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To :

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Subject: Comments on TRAI Consultation Paper No. 9/2011

"Allocation of Spectrum Resources for Residential and Enterprise Intra-telecommunication Requirements/ Cordless Telecommunication Systems (CTS)".

Dialog Semiconductor is a major semiconductor manufacturer for DECT ICs

Dialog Semiconductor creates energy-efficient, highly integrated, mixed-signal circuits optimised for personal portable, short-range wireless, lighting, display and automotive applications. The company provides flexible and dynamic support, world-class innovation and the assurance of dealing with an established business partner.

With its unique focus and expertise in system power management, and now with the recent addition of short range wireless and VoIP technology to the portfolio, Dialog brings decades of experience to the rapid development of integrated circuits for personal portable applications including smartphones, tablet PCs, digital cordless phones and gaming applications.

Please have also a look to our website: www.diasemi.com

Issues for Consultation

3.1 Whether the current allocation of spectrum for CTS is sufficient to meet the requirements? If not, then how to meet the demand of cordless telephony spectrum requirements?

Answer: The current license exempt spectrum is not sufficient. The demand can be met by allocating license exempt spectrum (protected by a coexistence etiquette) in the blocks 1880-1900 MHz and/or 1910-1920 MHz.

3.2 In view of the availability of cellular mobile services in the country and possibility of Fixed Mobile Convergence (FMC), is there any need to have DECT Phones?

Answer: Yes, there is a need for DECT phones.

3.3 Is there any requirement of allocating spectrum for digital CTS, in view of similar solutions being available in already de-licensed band 2.4 & 5.8 GHz?

Answer: Yes, because in order to guarantee good quality of service for CTS a coexistence etiquette is required, which is not available in the ISM band.

3.4 Whether de-licensing of the spectrum for digital CTS applications will be the right path?

Answer: Yes, de-licensing of the spectrum for digital CTS applications will be the right path to ensure a low cost service for a maximum number of people.

3.5 Do you agree that the 1880-1900 or 1910-1920 MHz band (TDDMode) be allocated for digital CTS applications? If yes, what should be the limits of emitted power (EIRP), power flux density (pfd),antenna gain etc?

Answer: Yes, the 1880-1900 or 1910-1920 MHz band (TDD Mode) should be allocated for digital CTS applications with a maximum terminal power of 250 mW (+24 dBm) and an antenna gain of at least 3 dBi.

3.6 Do you see any coexistence issues between existing cellular systems using adjacent band with low power CTS allocations in 1880-1900 or1910-1920 MHz band?

Answer: No harmful interference is to be expected. The potential interference cases that will occur in India have already been studied and analyzed. The studies and hundreds of millions of DECT installations all over the world confirm good coexistence properties.

3.7 Whether the de-licensing of either 1880-1900 MHz or 1910-1920MHz band for low power CTS applications will result in loss of revenue to the government?

Answer: De-licensing should not result in loss of revenue to the government. DECT is around the world allocated within the guard band between cellular up-links and down-links. These guard bands are very difficult to use for public cellular systems. Using them for low power state of the art CTS to the benefit of the general Indian public will cause indirect revenues to the Indian society.

3.8 Will there be any potential security threat using CTS? If yes, how to address the same.

Answer: There will not by a security threat when using DECT, because DECT provides state of the art security features.

3.9 Amongst the various options of digital technologies available to meet the cordless telephony requirements, either spectrum allocation can be considered according to technology or the etiquettes/ specifications can be defined for the de-licensed spectrum band. What method of allocation of spectrum for digital CTS applications should be adopted?

Answer: The most efficient way is to define an appropriate coexistence etiquette and to allow access to the whole spectrum. This has been standardized in DECT technology.

3.10 Any other issue?

Answer: none.

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