

DFI/GEN/09

Nov 2009

The Chairman,  
TRAI  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg  
New Delhi 110002

**Comment/Response to TRAI consultation paper 6/200**  
**By DECT FORUM INDIA (DFI)**

Dear Sir,

With reference to above TRAI paper and response received by TRAI on in building solutions DECT Forum India has following comments for kind consideration of the Authority:

DECT is a technology being used world over for these solutions. To promote DECT technologies in India, DECT FORUM INDIA (DFI) has been formed. DECT (Digital Enhanced Cordless Telecommunications) is an ETSI (European Telecommunication Standard Institute) based technology, which has been adopted in over 100 countries all over the world. It is also member of IMT 2000. This technology is most suitable for residential cordless and office wireless EPABX and data networking solutions. DECT systems radiate very low power and are mainly deployed for indoor operations. We feel this market is under served as current cordless systems do not meet customer's requirement. Therefore TRAI recommendations need to look cover spectrum for these solutions. Technology operates on frequencies between 1880 and 1920 MHz band. Normally 20 MHz are allocated, but in some countries 10 MHz band is also used. As of now DECT is the dominant technology in these niche areas and is being constantly updated to meet the evolving challenges of consumer's requirement specially, for NGN operations and connectivity in Rural areas.

DFI has noted that in paragraph 2.49 Dynamic Spectrum Access is mentioned as a future method to allocate spectrum and to increase flexibility and spectrum efficiency, which also relates to Questions 32 and 33. DFI hereby wants to make TRAI aware of the DECT (Digital Enhanced Cordless Telecommunications) technology, which has a very advanced Dynamic Spectrum Access, called Instant Dynamic Channel Selection, which allows uncoordinated (private and public) system installations to coexist while maintained high link quality on a common shared spectrum. The technology is based on MC/TDMA/TDD Radio access system. This leads to the following proposals:

- 1) DECT residential and enterprise applications could be allocated (on a licence exempt regime) within the band 1880-1920 MHz, without limiting the capacity or service quality of existing DECT WLL services, and without causing harmful interference to services on adjacent bands. DFI is able and willing to demonstrate this.

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- 2) The main aim of the TRAI consultation paper is to address the limitation/shortage of spectrum for cellular/BWA access. Getting an allocation for DECT private systems will indirectly ease the load on cellular (rural) spectrum, since internal real time wireless communication will often be made over DECT instead of using the cellular network. Also, fixed to mobile convergence will be possible.
- 3) If some revenue to the government would ease opening the spectrum on a license exempt regime, it would be possible to introduce a "per radio unit" fee paid by the distributors of the DECT systems, similar to the UTAM fee for DECT in the US. The fee could be in the order of 15 Rs per radio unit. Request for licence exempt band is mainly because it is consumer oriented technology, used mainly for indoor operations and radiates very low level of RF power. As a result all the hundred countries using it have made it licence exempt. This request is also in line with TRAI document "Recommendations on spectrum related issues" May 13, 2005, clause 4.2.2 reproduced below :

"Along with new technologies, new methods for enhancing spectrum efficiency are also being implemented, including smart antennas and software defined radios. With these technologies, co-existence issues are becoming easier to manage, and many spectrum administrators are transitioning to allocating spectrum purely on spectrum usage masks. Many regulators are also transitioning to provide for more "spectrum commons", bands where spectrum is de-licensed and open to a variety of users for varied purposes, but with certain defined etiquette standards that are not prevalent in current de-licensed bands."

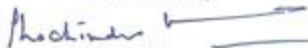
- 4) Experience from the DECT technology using Instant Dynamic Channel allocation could be studied and may be implemented also for cellular/BWA technologies/ services, which so far hardly have implemented any means of that kind.

Since DECT is an IMT-2000 technology, thus allocation in the proposed band is in line with ITU-R recommendations.

TRAI is requested to consider favorably incorporation of above inputs in the final paper.

Thanking you,

Yours faithfully,

  
SS Motial  
Chairman  
DECT Forum India

Copy to :

Member TRAI

Secretary TRAI

Advisor Mobile Networks TRAI