

Telecom Regulation Authority of India  
Rajendra Singh, Advisor

Berne, 15. July 2004

Your ref. Consultation Paper on Spectrum Related Issues:  
Efficient Utilisation, Spectrum Allocation, and Spectrum Pricing

Our ref. DF SECR(2004)017.0

## **Efficient Utilisation, Spectrum Allocation, and Spectrum Pricing**

---

Dear Madams and Sirs:

The DECT Forum is pleased to provide the attached document, containing its comments and responses to the TRAI Consultation on Spectrum Related Issues.

The DECT Forum is the global industry association embracing suppliers and operators of DECT based terminals, systems, and networks. DECT stands for "Digital Enhanced Cordless Telecommunications", also referenced as IMT-2000 FDMA/TDMA and denotes within the IMT-2000 framework a Micro cellular technology based on TDD for voice data and networking applications, DECT as one of five IMT-2000 RTTs is the only IMT-2000 family member optimised for uncoordinated use, it is furthermore applicable on an unlicensed spectrum.

The DECT Forum represents the interests of the DECT industry.

With more than 112 countries worldwide having adopted the DECT technology and with more than 250 million cordless products operating in 1880-1900 MHz and 1910-

### **DECT Forum**

P. O. Box 7465, CH-3001 Berne, Switzerland  
E-mail: [secretariat@dect.org](mailto:secretariat@dect.org) Internet: <http://www.dect.org/>

1930 MHz respectively the price points for these products are in reach of every consumer wanting better clarity and more useful features in their cordless communication needs.

The vision of the DECT Forum for the use of this technology is for Indian citizens to experience technological communication applications that are currently available in Europe and other parts of the world. Products such as residential and small business cordless phones that do not interfere with current Wireless LAN products and offer outstanding voice quality and enhanced services in the IMT-2000 framework is just one of the many new applications that can be made available.

We hope that you will find our contributions useful and wish you furthermore a successful consultation and insightful results.

Yours sincerely



For the DECT Forum  
Erich Kamperschroer, Chairman

---

## Enclosure

- Statement of the DECT Forum

**DECT Forum Response to the  
TRAI Consultation on Spectrum Related Issues:**

## **Efficient Utilisation, Spectrum Allocation, and Spectrum Pricing**

---

### **General Remark:**

---

The following text contains DECT Forums comments and responses to the TRAI Consultation on Spectrum Related Issues, DECT Forum recommendations regarding this topic can be summarized as follows:

- The IMT-2000 technologies should be allocated in the IMT-2000 bands according to ITU-R Recommendation M.1036-2 frequency arrangement B1.
- The band 1880 – 1900 MHz should be kept technology neutral and reserved for TDD operations only.

### **Comment:**

---

(vi) Whether the band 1880 – 1900 MHz be made technology neutral for all BSOs / CMSPs / UASLs and be made available with the pair 1970 – 1990 MHz or should it be kept technology neutral but reserved for TDD operations only.

The band 1880 – 1900 MHz should be kept technology neutral and reserved for TDD operations only.

This is an important band for the operation of DECT and Cor-DECT. Cor-DECT provides a valuable service to the rural communities in India. DECT provides cordless delivery of cheap fixed telephone and data services and price points for these products are in reach of every consumer wanting better clarity and more useful features in their future cordless communication needs. Each system is self organising and is al-

### **DECT Forum**

lowing public and private residential systems to co-exist. The DECT technology is highly spectrum-efficient and belongs to one of the five ITU RTTs and therefore fulfills the IMT 2000 technical requirements, DECT is placed well for unpaired TDD operation in all IMT-2000 frequency arrangements worldwide. Equipment is widely available in the country and abroad, because this frequency band is globally harmonised.

More than 112 countries worldwide have adopted the DECT technology and more than 250 million cordless products are currently operating in 1880-1900 MHz and 1910-1930 MHz respectively.

DECT as one of five IMT-2000 RTT's is the only IMT-2000 family member optimised for uncoordinated use, it is furthermore applicable on an unlicensed spectrum.

The immense popularity and utility of unlicensed spectrum is well known to the TRAI. New types of equipment and services are continually being developed and provide great benefit to the economy and the public at large.

If the 1880 - 1900 MHz band would be allocated for mobile use, then the TRAI might be obliged to clear these unlicensed users from the band to prevent interference. This would be an unrealistic task given the ease with which globally manufactured equipment can enter the country.

DECT Forum has no further comments to the other issues of consultations.