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Sub : TEMA Response to Consultation Paper No. 10/2016 on In-Building Access by Telecom Service Providers

Dear Sir,

First of all, we would like to take this opportunity to congratulate TRAI for coming with a consultation paper on 'In-building Access' by TSPs, which is very relevant at this time when the country is facing lot of issues related to Quality of Service and frequent Call drops. We are sure, by addressing the issues raised in the consultation on in-building access by TSPs, the authority will be in a better position to tackle other issues in a broader perspective to a certain level.

Being an Association representing the domestic telecom equipment manufacturers in the country, we tried to answer the queries from industry perspective.

1. Do you agree that there is a need to address the issues discussed in this consultation paper or the market is capable of taking care of these issues without having any policy intervention/guidelines in this regard?

While we agree that there is a need to address the issues with right policy intervention / guidelines, we feel, the role of TRAI / DOT is very limited as the issues related to issuing guidelines in the building bye-laws to ensure access to TSPs etc., comes under the purview of local administration and respective ministries. TRAI/ DOT can make necessary guidelines for addressing the capacity & coverage requirements inside the building with requisite QOS parameters.

2. How can sharing of telecom infrastructure inside a residential or commercial complex/airport/hotels/multiplexes etc among service providers be encouraged? Should the sharing of such telecom infrastructure be made mandatory?

As rightly mentioned in the consultation paper, there are instances where only one TSP is allowed to lay the telecom infrastructure and others are denied access by the building owners / RWAs etc. Access to TSPs cannot be denied and there should be policy intervention to ensure Licensed TSPs get access in the building – without any charge for such permission to access.

(2)

For Network extension and distribution within the building, it should not be mandatory on any TSP to share the network installed by one TSP with other TSP. TSPs should have full freedom to share on mutually agreeable terms. Unrestricted Network sharing should be allowed among TSPs.

In this regard, we feel shared In-building Solutions by a Neutral service provider' will be a perfect alternative to address mobile traffic inside the buildings. With this, all TSPs, providing services in multiple frequencies and technologies, can utilize the same efficient antenna system, eliminating the need for multiple unsightly antennas distributed across a building. This will also help to protect the ambience and aesthetics of the building as this does not involve multiple wirings. The TSPs can easily 'plug-in' to neutral service provider's IBS infrastructure and start running services immediately.

3) In view of the international practices given in para 18-23 of Chapter-II of the Consultation Paper, what provisions should be included in the National Building Code of India to facilitate unhindered access for all the TSPs?

TEMA members have been actively participating in the discussions on National Building Code of India convened by BIS and have submitted our views.

4. Any other option, which in your view, could resolve the issues discussed in this consultation paper? Please explain and justify your opinion on all the above questions

As mentioned in response to Sr. No. 1, TRAI/DOT should address the issues related to capacity & coverage requirements inside the buildings which come directly under its purview.

With the advancement of technologies, greater data capacity and the ability of third-generation networks to provide high-speed data services increase the demands put on the cellular network inside the building.

Most of the traffic originated and terminated are when the subscriber is inside the building, be it residential or commercial buildings like offices, shopping complexes, movie halls etc. By shifting the in-building mobile voice and data traffic on to an in-building solution, not only the in-building coverage and capacity is improved with high grade of Quality of Service but there is also a direct impact on the capacity of the outdoor macro network. The conventional networks have been designed primarily to provide good coverage in outdoor environments, not inside buildings.

(3)

As we understand, in order to address such situation, some countries in the Europe have allocated dedicated spectrum ranging from 3.3 to 5.0 MHz in 1800 MHz band for operating low-power systems and in-building solutions, so as to decongest the outdoor macro-network.

In India, the National Frequency Allocation Plan released in 2011 (NFAP 2011), have earmarked some provisions under Footnotes IND50 & IND55 to consider small chunks of spectrum in 900/1800 MHz band for requirement of microcellular low powered telecom systems using indigenously developed systems and technologies with Max EIRP of 4 Watts subject to coordination on a case by case basis.

We firmly believe allocating a dedicated small chunk of frequencies of 2-3 MHz in GSM bands, as in practice in some European countries, will address most important aspect related to capacity & coverage with high grade of QoS inside the buildings while decongesting the outside macro network to ensure efficient use of frequency spectrum.

The provisions contained in NFAP 2011 may be considered and the final recommendations from TRAI may suitably include implementation of the NFAP provisions at the earliest.

We hope our above inputs will be taken into consideration while finalizing the recommendations by TRAI on this topic.

Thanking you,

For Telecom Equipment Manufacturers Association

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