

Subject: Response to Consultation Paper on In-Building Access by Telecom Service Providers

To,
Shri Sanjeev Bansal,
Advisor (Networks, Spectrum and Licensing)
TRAI

Sir,
Please find my response below on consultation paper

Question 1:

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?

I would like to thank TRAI for bringing this consultation paper on much required need for consumers. Exponential growth of Indian mobile and broadband services started in early 2000 and Indian market was a huge opportunity in terms of numbers for operators to tap in. However now that India has reached high teledensity, market had moved from number of customers to 'increasing wallet share of spend on info-comm' services by customers. This competition for increasing wallet share has led to practices as called in paper and hence it is time to form a framework and a regulatory standing not only from telecom perspective but also involving other departments as mentioned in the paper.

While issue called out exists in mobile, services where consumers are suffering the most are for broadband and DTH services wherein operators are trying to create a monopoly within areas/societies. With launch of broadband enabled video services, this market landscape is only going to get murkier.

There are equally important issues wherein even operators are struggling to provide best of services due to multiple approvals and lack of clarity on customer facing regulations to supported by other department, esp urban development

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?

Even with best of planning and scale, there is always a limit to which you can 'build' infrastructure. While there can always be grand plan to keep upgrading, best investments are always wherein resources can be maximum utilized first before further expenses are pumped in. There is also an intangible benefit which should be also be kept in mind and that is around 'maintaining aesthetics' of a structure. If we look at cases in other part of world, they think a lot about ensuring architecture of the structure while providing the support for creating technical infrastructure. For ex, in middle east and in Singapore, cellular towers are made like date tree design which hide the towers within artificial leaves.

Whereas if we look at Indian buildings/societies, one can find hundreds of wires hanging loose along with multiple dish antennas pumping out on walls. While cellular towers have started witnessing sharing of transmission infrastructure, which is run by third party players for some of big brand, scenarios within the end premises is very different.

Every floor of building have boxes been plated by 2-3 players and wires hanging around. Worst are scenarios wherein operators lays their wires first and sign exclusive agreements which starts the story of pathetic customer experience due to monopoly of operator.

There are vested interests of parties from operators and societies who does not let options increase due to legal clauses getting into scene afterwards.

There are similar scenarios at national assets like airports where options for wireless access is limited to single operators and it is widely acknowledged that their services are pathetic and there are multiple experiences of customer which can vouch for it.

Therefore, it is high time a framework for sharing of telecom infrastructure is formulated.

While it is well known fact, that consumers are always looking for options, be it when they at airport, transit on road, societies, or other scenarios. Constraints are mainly created by stakeholders in enterprise entities for their vested interest. For ex, while people in societies want 2-3 broadband players to provide services, builder sign an agreement with operator X and limit the services using legal clause.

There are other genuine scenarios also, for ex societies which are old and require operators to provide services, have to give them permission for digging of cables, etc which happen multiple times and at different point of time. This in turn leads to other related problems within society infrastructure and hence they have to put constraint on multiples digging.

Making telecom infrastructure should be encouraged by providing clear guidelines but making it mandatory may not be best path forward.

For ex, a society may not be in favour of getting mobile tower due to some apprehensions, however same society can have common infrastructure like Common Dish antenna be deployed by multiple operator along with allowing broadband players to access common ducts and internal wiring for providing services.

DMRC is one such visionary example, wherein they already planned the same through IP type model.

For residential societies, urban development has to pitch in for clauses which provide strict guidelines to enable infrastructure sharing.

Restricted Public areas like Hotels have to provided with guidelines as part of their license to enable their design and infrastructure to support multiple providers. Since hotels have a right to select provider, it should not be enforced to have multiple provider. Being hospitality industry, they will anyways ensure best partners to provide best customer experience to their customer.

Public structures like tourist hubs, airports, railway station should allow unbundled access using their existing infrastructure.

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?

Some of the recommendations may be:

- *The developer or owner shall allow any telecommunication licensee to install telecommunication cables within the building to serve any tenant or lessee, should the latter require the use of such cables.”*
- *Member States shall ensure that all newly constructed buildings at the end-user's location, including elements thereof under joint ownership, for which applications for building permits have been submitted after 31 December 2016, are equipped with a high-speed-ready in-building physical infrastructure, up to the network termination points*
- *Member States may provide for exemptions from the obligations provided for in paragraph 1 and 2 for categories of buildings, in particular single dwellings, or major renovation works in cases in which the fulfilment of those obligations is disproportionate, such as in terms of costs for individual or joint owners or in terms of type of building, such as specific categories of monuments, historic buildings, holiday homes, military buildings or other buildings used for national security purposes. Such exemptions shall be duly reasoned. T*
- *In the absence of available high-speed-ready in-building infrastructure, Member States shall ensure that every public communications network provider has the right to terminate its network at the premises of the subscriber, subject to the agreement of the subscriber, provided that it minimises the impact on the private property of third parties*
- *It encourages building design and construction professionals to design new buildings with adequate building access facilities so that the Network Operators can install their networks and provide services in the most efficient manner without causing undue inconvenience to both the developer and the occupants*
- *For existing buildings, the developers and/or building management are also strongly encouraged to follow the principles of this COP as far as practicable when new or additional cabling facilities are to be constructed. COP covers Office and Commercial Buildings; Residential Buildings; Hotels; Dwelling Houses; Industrial Buildings (e.g. warehouses, factories, manufacturing buildings); and Campus-Type Buildings (e.g. hospitals, universities).*
- *The document states that if a network operator is a sole block-wiring provider of a new building then it should use its reasonable endeavor to provide sufficient capacities of the IBTS. The provided capacities should meet the requirements of other Network Operators who intend to provide telecommunications services at the same building in the first 12 months from the issue of the Occupation Permit.*

In India, existing municipal authorities are also deterrent while putting up communications network, and therefore recommendations also need to be provided which provided clear guidelines for authorities

4. Any other option, which in your view, could resolve the issues discussed in this consultation paper?

While fibre optic and wireline broadband will still be strong enabler, growth of 4G and now under trial 5G technology will help resolve some of the conflict related to physical infrastructure.

Therefore, policy recommendations should focus strongly towards addressing challenges related to addressing wireless services enablement and sharing. Wireless will soon become last mile connectivity instead of fibre or cable as in today's scenario. It is important to enable infrastructure sharing for enabling wireless services for providing high speed broadband and video/live TV services.

Like Apple TV will be a reality soon which will ride on wireless and might replace tons of dish antennas in a same way how dish replaced multiple wires from local cable provider. Today if we look at broadband or broadcasting services, there is monopoly in most of consumer areas be it residential societies, airports or any other public place.

Faster resolution to provide the best services will be through wireless, therefore policy requires definitions which can support growth of infrastructure for the same.

From:

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