

Prakash R Munshi

Raj Niketan B.G.Kher Marg, Mumbai 400006 Tel: 022 23672115 Cell ;+919820400053

Date : July 06,2016

To,
Shri Sanjeev Banzal,
Advisor (Networks, Spectrum and Licensing)
TRAI
Email: advmn@tra.gov.in.
Telephone No. +91-11-23210481
New Delhi

Dear Mr. Banzal,

**CONSULTATION PAPER ON IN-BUILDING ACCESS BY TELECOM SERVICE PROVIDERS
DATED JUNE 06, 2016 (Consultation Paper No. 10/2016)**

I am enclosing herewith my opinions on the issues referred by you on the Consultation Paper dated June 06, 2016, as per the four questions raised by you on Pg. 14 of the Consultation Paper.

I am writing to you as an individual and a concerned citizen who is working for the last five years creating awareness among citizens across the country on Health Hazards due to EMF Radiation from Mobile Tower Antennae and Mobile Phones.

Your Sincerely,
Prakash Munshi

Consultation Paper on In-Building Access by Telecom Service Providers (Consultation Paper No. 10/2016) : July 07,2016

Issues for Consultation

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?

We are of the opinion that there is no need to address the issues discussed in this Consultation Paper on “In-Building Access by Telecom Service Providers”. In the last decade the market was capable of taking care of the issues on a commercial basis between the landlords/owners and the service providers.

It is best left to the market rather than impose compulsions from the Government and the Regulatory Authorities on citizens creating a wrong impression and precedence in the market.

1. “Basic Needs” are food, clothing and shelter. It would be totally incorrect to call telecommunication services as a Basic Need, at most it can be covered under the next hierarchy of the needs – “Social Needs”.
2. The pressure on the urban areas for the infrastructure development will continue and the Telecom Service Providers (TSPs) will have to cope with it and work towards improvement in technology and reduction in radiation levels at the ground level to obtain the support from the citizens.

The citizens in India, are not aware of the radiation levels being emitted by the antennae/wi-fi hotspots in the close proximity to their residences, offices, schools etc... The norms revised by the Indian Government on September 1, 2012 to 10% of the previous ICNIRP norms followed by the Indian Government were fixed by the Department of the Telecommunications as recommended by COAI and AUSPI (Inter-Ministerial Committee Report Pg. 44)

The reduction in norms on September 1, 2012 was done on an ad-hoc basis without any scientific study, according to R. Chandrasekhar, Ex- Secretary DoT mentioned on a TV program (NDTV 2012).

The new in buildings services include wi-fi and cellular services, for which there are no combined radiation norms and guidelines issued by DoT. Also there are no norms of radiation levels for clusters of antenna, and these have not defined by DoT.

The Department of Telecommunications has also informed the Parliamentary Standing Committee on Information Technology 2013 (53rd Report), that five countries (Italy, Poland, Bulgaria, Lithuania and Russia) in the world have lower norms than India. Revised Indian Norms are 10 times higher than these countries. Indian norms are not the most stringent norms in the world.

In view of the above, it is also necessary for TRAI to take up with DoT to reduce the actual Radiation Levels at the ground levels by reducing Radiation Norms and the maximum power transmitted by the antennae to less 1 watt.

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?

We refer to the telephone conversation with Shri Sanjeev Banzal, Advisor (Networks, Spectrum and Licensing), TRAI, when he clarified that the present consultation paper was only for in-building access by TSPs and had nothing to do with mobile tower antennae on top of the building or on the sidewalls of the buildings. He also clarify sharing of telecom infrastructure inside a building was only for ducting Optical Fibre/Copper Cables and Micro Cells.

Presently, MTNL Broadband cables are installed on various floors of the building but are copper cables. In case the consumer wants to go in for high speed optical fibre cables a fresh arrangement for an optical fibre cable will have to be made with TSPs.

Incase new Optical Fibre cables have to be installed by TSPs they will have to have discussions with landlords/owners to arrive at mutually acceptable terms. If the optical fibre cable installed within the buidling can be shared by TSPs, then such sharing should be made mandatory.

Another problem would be in old buildings where no ducting facility is available and this will have to be discussed separately with individual buildings.

We have observed in Development Plan 2034 of the Muncpal Corporation of Greater Mumbai (MCGM), Clause 58, Pg 294

"58. Common Antenna for Television Transmission Reception/ Telecommunication/ Digital Communication:-

In every Building the provision for

(1) Installation of common Television Transmission Reception/Antenna, and Ducting for telecommunication lines and optical fibre cable for Digital Data communication /transmission shall be made

(2)Ducting for laying of piped gas connection in the surrounding of building"

However, such ductings can be implemented only for new buildings and sharing of such telecom infrastructure for broadband cabling and micro cells and phento cells is recommended at ALARA (*As Low As Reasonably Achievable*) radiation levels.

However, one cannot avoid the commercial arrangements between the TSPs and the landlords/ society. The landlords/ society will not permit free access into their property.

Prakash R Munshi

Raj Niketan B.G.Kher Marg, Mumbai 400006 Tel: 022 23672115 Cell ;+919820400053

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?

The National Building Code of India should cover:

1. Old constructions
2. New Buildings

New Buildings can have space for ducting of cables for high speed wired connections for consumers.

We request you to obtain building codes from USA, UK and Australia and put it on the website.

In case the ducting and cable has been installed by TSP 1 and if TSP 2 and TSP 3 also want to use the same ducting for their fresh connections the modus operandi should be spelt out in the National Building Code of India, including how to settle a dispute in case of damage to TSP1 cable /ducting.

All in-building access facilities to TSPs require dispute resolution functions to avoid problems for the consumers.

Prakash R Munshi

Raj Niketan B.G.Kher Marg, Mumbai 400006 Tel: 022 23672115 Cell ;+919820400053

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.

Firstly, there should be a meaningful dialogue between the government, industry and citizens.

The fear of health hazards amongst citizens can only be removed by discussions of international studies, research, technology, norms and actual radiation levels in various countries.

The radiation levels can be reduced only by reducing the power transmission from the antennae. India permits a maximum power transmission from antennae for lower frequencies at 20 watts and for frequency higher than 2100 MHz – 40 watts per antennae.

This is much higher than FCC Regulations in US which specify, ***in urban areas, an ERP of 10 watts per channel (corresponding to a radiated power of 0.5 - 1 watt) or less is commonly used.***

Although France follows the ICNIRP Norms (which are ten times higher than Indian Norms), 97% of their antennae are below 20 mW/m².

LE POINT FRANCE 15 OCTOBER 2013 : http://www.lepoint.fr/sante/les-ondes-electromagnetiques-sont-elles-dangereuses-15-10-2013-1744000_40.php

LE POINT FRANCE 15 OCTOBER 2013

http://www.lepoint.fr/sante/les-ondes-electromagnetiques-sont-elles-dangereuses-15-10-2013-1744000_40.php

Electromagnetic waves are dangerous?

The Point.fr - Published 15/10/2013 at 06:24 - Modified 15/10/2013 at 06:29
Four years after a first notice, the Agency makes safety Tuesday a highly anticipated effects of electromagnetic wave ratio.

Possibly carcinogenic

A departmental document in March 2013, taking the opinion of the handles of 2009, recalls the position of experts: "Acute high-level exposure to electromagnetic fields can cause thermal effects," an increase of tissue temperature. "This is to prevent the effects of exposure limits have been developed" and also "questions remain about the long-term heavy users of mobile phones." For this reason, the World Health Organization in May 2011 classified the radiofrequency electromagnetic fields (from 9 to 300 GHz) as "possibly carcinogenic."

|

In 2009, according to the handles, the available research does not allow to identify a mechanism for non-thermal effects, a concern for some who suspect associations and other effects argue for a reduction in exposure population. The threshold limit is therefore subject to debate. Set from 41 V / m and 61 V / m (depending on the technology), it is in fact well below these values. According to the work of experimentation on the airwaves Committee (Copic), **97% of French territory, emissions antennas are less than 2.7 V / m.** And to lower the threshold to 0.6V / m, a level demanded by certain associations, it should at least increase the number of antennas three, said the Copic in these conclusions submitted in September to the government.

Prakash R Munshi

Raj Niketan B.G.Kher Marg, Mumbai 400006 Tel: 022 23672115 Cell ;+919820400053

Indian Radiation Norms are ten times higher than Italy, Russia, Poland, Bulgaria and Lithuania according to the Department of Telecommunications communique to Parliamentary Standing Committee on Information Technology 2013.

In addition to the above countries Australia although following ICNIRP Norms have actual radiation levels according to ARPANSA (*Australian Radiation Protection and Nuclear Safety Agency*), ranging from 0.904 mW/m² to 150.99 mW/m² for the combined radiation from individual base stations.

The actual radiation levels prevailing in India are also not published by the Department of Telecommunications nor the industry, as is being done in other countries like Australia – ARPANSA.

It is high time that India realises the harm EMF radiation can do to our citizens because of high radiation levels which are permitted by the extremely high radiation norms prevailing in India.

We would like to bring to your notice, the precautions given by Department of Telecommunications in a half page advertisement in national dailies also advised

Department of Telecom, Govt. of India
Sanchar Bhawan, 20, Ashoka Road, New Delhi 110001

Ensuring Safety from Radiations : Mobile Towers and Handsets

8. If you have a choice, use a LANDLINE (WIRED) phone not a MOBILE phone

Precautionary Guidelines for mobile users

1. Keep distance – Hold the cell phone away from body to the extent possible.
2. Use a headset (wired or Bluetooth) to keep the handset away from your head.
3. Do not press the phone handset against your head. Radio Frequency (RF) energy is inversely proportional to the square of the distance from the source.
4. Limit the length of mobile calls.
5. Use text as compared to voice wherever possible.
6. If the radio signal is weak, a mobile phone will increase its transmission power. Find a strong signal and avoid movement. Use your phone where reception is good.
7. Let the call connect before putting the handset on your ear or start speaking and listening – A mobile phone first makes the communication at higher power and then reduces power to an adequate level. More power is radiated during call connecting time.
8. If you have a choice, use a landline (wired) phone, not a mobile phone.
9. People having active medical implants should preferably keep the cell phone at least 15 cm away from the implant.
10. While Purchasing a Mobile Handset check the SAR value of the mobile phone. It can be searched on internet if its model number & make is known.

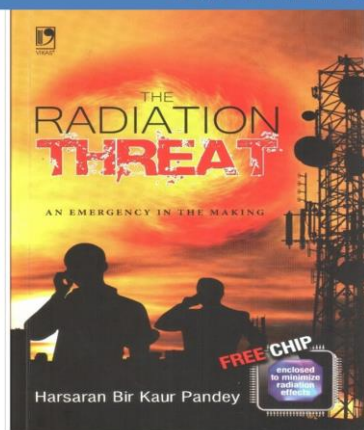
Image: 06201133000411213

Prakash R Munshi

Raj Niketan B.G.Kher Marg, Mumbai 400006 Tel: 022 23672115 Cell ;+919820400053

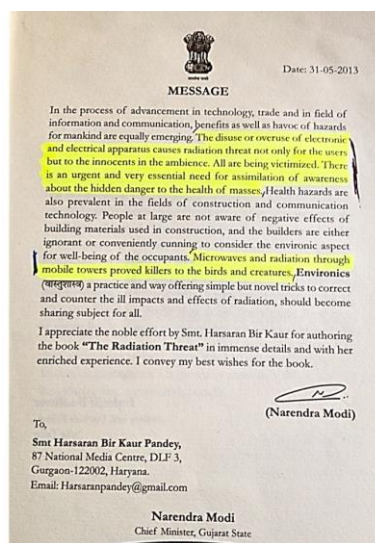
In addition to the above our beloved Prime Minister's message to Harsaran Bir Kaur Pandey's book given below also strengthen the citizen's fear of health hazards from EMF radiation.

PRIME MINISTER SHRI. NARENDRA MODI



“THE DISUSE OR OVERUSE OF ELECTRONIC AND ELECTRICAL APPARATUS CAUSES RADIATION THREAT NOT ONLY FOR THE USERS BUT TO THE INNOCENTS IN THE AMBIENCE. ALL ARE BEING VICTIMIZED. THERE IS AN URGENT AND VERY ESSENTIAL NEED FOR ASSIMILATION OF AWARENESS ABOUT THE HIDDEN DANGER TO THE HEALTH OF MASSES.

“MICROWAVES AND RADIATION THROUGH MOBILE TOWERS PROVED KILLERS TO THE BIRDS AND CREATURES.”



Improved technology with low radiation levels will also help in building up confidence levels between the industry and the citizens.