

**Comments of**  
**Indusind media and Communications Limited**  
**on TRAI Consultation Paper on National Broadband Plan**

**PREAMBLE:**

The TRAI's consultation paper on National Broadband Policy could not have come at a more appropriate time as

1. The BWA spectrum has just been allocated
2. 3G Spectrum is on the way.
3. Wire line Broadband has not grown even half as much as expected.

For National Broadband to reach its desired levels it is essential that wire line and wireless Broadband compliment each other to meet the desired Broadband requirements of the country in an optimum fashion, covering the needs of urban and rural India.

**COMMENTS ON QUESTIONS RAISED IN THE CONSULTATION PAPER**

**CHAPTER 2: Broadband – Demand & Supply**

**5.1 What should be done to increase broadband demand?  
(Reference Para 2.23)**

Besides normal promotions, We recommend the following

1. The Incentive in the form of low / no tax on Residential Broadband / low value packages, for two years to make it more affordable to common man.
2. No additional burden should be put on either the consumer or the ISP.
3. Work on more applications /use of Broadband
4. Faster e-governance projects. All Government processes on the Internet.

**5.5 Do you agree with projected broadband growth pattern and Futuristic bandwidth requirements? (Reference Para 2.35)**

- Yes

**5.6 Do you agree that existing telecom infrastructure is inadequate to support broadband demand? If so what actions has to be taken to create an infrastructure capable to support futuristic broadband? (Reference Para 2.35)**

- We agree that existing Telecom Infrastructure is insufficient. There is a need for direct government initiative backed by massive public funding for the development of necessary infrastructure specially the fibre optic backbone to cover all the rural areas too.

### **CHAPTER 3: National Broadband Network**

#### **5.7 What network topology do you perceive to support high speed broadband using evolving wireless technologies? (Reference Para 3.22)**

- The topology has to be designed in a manner that utilizes the existing wire line systems, the fibre optic backbone and the wireless spectrum.
- While the user can take advantage of Wired Broadband when stationary, by either wired connection of Wi Fi and can use the wireless on the move.
- For fixed Broadband there can not be a better solution then Fibre to Home or Fibre to curve or Cable HFC network
- Wireless Technologies will be an essential part of have Broadband at all places
- Wireless Technologies will also be useful for rural penetration

#### **5.8 What actions are required to ensure optimal utilization of existing copper network used to provide wire line telephone Connections? (Reference Para 3.22)**

- Introducing local loop unbundling from BSNL and MTNL to help ISPs and other service providers to have greater access to consumers thereby achieving greater competitive environment in near future, until we provide Fibre to home.

#### **5.9 Do you see prominent role for fibre based technologies in access network in providing high speed broadband in next 5 years? What should be done to encourage such optical fibre to facilitate high speed broadband penetration? (Reference Para 3.22)**

- As covered under 5.7 without Fibre the Broadband can not grow whether Fixed or wireless.
- Even for backhaul of wireless technologies the fibre is essential.
- Simpler and Economical ROW and promoting laying the Fibre-optic cables will help Broadband.
- PON equipment should be made more affordable by providing incentives on Taxes or otherwise.

#### **5.10 What changes do you perceive in existing licensing and regulatory framework to encourage Cable TV operators to**

**upgrade their networks to provide broadband? (Reference Para 3.22)**

- To encourage Cable Operators to upgrade their network to increase Broadband penetration, they should be allowed to provide all the services they can on the Fibre.

**5.11 Is non-availability of optical fibre from districts/cities to villages one of the bottlenecks for effective backhaul connectivity and impacts roll out of broadband services in rural areas? (Reference Para 3.39)**

- Yes. This is the main factor.

**5.12 If so, is there a need to create national optical fibre network extending upto villages? (Reference Para 3.39)**

- Yes.

**5.13 In order to create National optical fibre core network extending upto villages, do you think a specialized agency can leverage on various government schemes as discussed in para B? (Reference Para 3.39)**

- Yes.

## **CHAPTER 4: Regulatory Challenges and Future Approach**

**5.16 Is there a need to define fixed and mobile broadband separately? If yes, what should be important considerations for finalizing new definitions? (Reference Para 4.18)**

and

**5.17 Is present broadband definition too conservative to support bandwidth intensive applications? If so, what should be the minimum speed of broadband connection? (Reference Para 4.18)**

- Always On and the speed being the factors, we can make Broadband as having minimum speed of 512K as of today.

**5.18 What specific steps do you feel will ease grant of speedy ROW permission and ensure availability of ROW at affordable cost? (Reference Para 4.30)**

- ROW charges should be standardised in every city. Earlier recommendations issued to states are to be implemented.

**5.19 Does the broadband sector lack competition? If so, how can competition be enhanced in broadband sector? (Reference Para 4.42)**

No. Broadband competition at retail and corporate level is high. This will increase further with 3G and WIMAX coming. However the competition in International Bandwidth is not so high.

**5.20 Do you think high broadband usage charge is hindrance in growth of broadband? If yes, what steps do you suggest to make it more affordable? (Reference Para 4.42)**

1. The Incentive in the form of low / no tax on Residential Broadband / low value packages, for two years to make it more affordable to common man.
2. No additional burden should be put on either the consumer or the ISP

**5.21 Do you think simple and flat monthly broadband tariff plans will enhance broadband acceptability and usage? (Reference Para 4.42)**

Yes

**5.22 Should broadband tariff be regulated in view of low competition in this sector as present? (Reference Para 4.42)**

It is not required. We expect the competition to intensify after use of BWA and 3G implementation

**5.23 What should be the basis for calculation of tariff for broadband, if it is to be regulated? (Reference Para 4.42)**

- Not applicable.

**5.33 Do you perceive need for any regulatory or licensing change to boost broadband penetration? (Reference Para 4.71)**

- A major policy initiative needed from the government is immediate permission to ISPs to offer VoIP services. The mistaken impression about VoIP services leading to financial problems to UASL operator is indeed just that – a mistaken threat where there is none because the price differential between normal calls and VoIP calls has rapidly diminished.
- Proposal in some quarters that ISPs be made to pay huge license fees to be permitted to offer VoIP services (through a - entry fee). This would appear to be defeating the very purpose.

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