DELHI DISTRIBUTION CO.

Office No. 2, First Floor, Local Shopping Centre, Uday Park, New Delhi – 1100 49

7th June, 10

Chairman

Telecom Regulatory Authority of India Mahanagar Doorsanchar Bhawan, Jawahar Lal Nehru Marg, New Delhi-110 002

Dear Sir

We are putting up the following comments regarding national broadband plan related issues

5.1 What should be done to increase broadband demand?

Allow Cable TV Operators to provide broadband and similar kind of services (provided by telcos) to the consumers because Cable TV Operators have huge infrastructure of coaxial cable as well as optic fibre cable, manpower, management capabilities, knowledge of his geographical area, relationship with customers, customer base, low cost service provider experience and Cable TV Operators adopt very fast to the new technology etc.

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?

Allow Cable TV operators to built OFC infrastructure and facilitate all facilities (like provided to telecom operators).

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?

Provide funds from various Govt. Schemes for laying of fibres and low cost CPU's, these CPU's can be connected with TV and used as Monitor.

Another huge barrier/major concern of Cable TV Operators is that most of Cable TV Operators/network operations are either through individuals or partnership firm and they are not eligible for ISP license because eligibility criteria for apply of ISP License should be registered under Companies Act 1956.

- 1. Our suggestion is firstly allow Cable TV Operators (individuals or partnership firm) for ISP License .
- 2. Eligibility Criteria for ISP License should be relaxed for the experienced Cable TV Operators e.g. minimum criteria is 5 years (alongwith PAN card, service tax, IT, firm registration, post office license etc.). Subsequently amount of bank guarantee should also be reduced.

5.18 What specific steps do you feel will ease grant of speedy ROW permission and ensure availability of ROW at affordable cost?

Railway ROW Charges are very high, please give suggestions to Railway to reduce their ROW charges for Broadband /Cable TV providers for infrastructure.

Municipal Corporations, Railway etc does not give permissions easily to Cable TV/Broadband service providers and there is massive corruption and this act is a huge hurdle in creating infrastructure, so please suggest/recommend if any body apply for permission to municipal corporation etc. and didn't get the permission, after 15 days from the date of receiving the application, permission should automatically be granted to the applicant and after self assessment of RR charges, same will be deposit by the broadband / Cable TV Provider to the concerned department (eg. In the case of income tax, service tax, entertainment tax, house tax, these taxes are deposited after self assessment).

Thanking you

For Delhi Distribution Co.

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