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भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

To

Advisor (BB&PA)

Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg, (Minto Road),
New Delhi-110002.

No. Regln/1-14/2011/ 9220

Dated: 30-09-2019

{Kind attention: Shri S.K. Singhal}

Subject: BSNL comments on TRAI Consultation Paper on "Issues Related to Telecommunications Infrastructure Policy Review of Scope of Infrastructure Providers Category-I (IP-I) Registration "

Kindly refer to TRAI's Consultation Paper issued dated 16-08-2019 on "Issues Related to Telecommunications Infrastructure Policy Review of Scope of Infrastructure Providers Category-I (IP-I) Registration".

In this context, the point wise comments of BSNL is as below:

1) Should the scope of Infrastructure Providers Category – I (IP-I) registration be enhanced to include provisioning of common sharable active infrastructure also?

BSNL Comments: Yes, the scope of Infrastructure Providers Category-I (IP-I) registration should be enhanced to include provisioning of common sharable active infrastructure also, provided these entities are also brought under licensing framework and the license fee on AGR/ GR is also applicable to them.

2) In case the answer to the preceding question is in the affirmative, then

i) What should be common sharable active infrastructure elements which can be permitted to be owned, established, and maintained by IP-I for provisioning on rent/lease/sale basis to service providers licensed/ permitted/ registered with DoT/ MIB? Please provide details of common sharable active infrastructure elements as well as the category of telecommunication service providers with whom such active infrastructure elements can be shared by IP-I, with justification.

BSNL Comments: The common sharable active Infrastructure elements like antenna, feeder cable, Node B, Radio Access Network (RAN) and transmission system for backend end-to-end bandwidth (on Microwave or OFC), wired access (FTTX) network, and IBS systems may be permitted to be owned, established, and maintained by IP-I for provisioning on rent/ lease/ sale basis to service providers licensed by DoT and the licensing structure is equally applicable to all such entities to avoid arbitrage among different players.

ii) Should IP-I be allowed to provide end-to-end bandwidth through leased lines to service providers licensed/ permitted/ registered with DoT/ MIB also? If yes, please

provide details of category of service providers to it may be permitted with justification.

BSNL Comments: Yes the IP-I be allowed to provide end-to-end bandwidth through leased lines to service providers licensed by DoT and is under licensing regime.

- iii) **Whether the existing registration conditions applicable for IP-I are appropriate for enhanced scope or some change is required? If change is suggested, then please provide details with reasoning and justification.**

BSNL Comments: No. These entities shall also be brought under licensing regime with equally applicable license fee to such entities

- iv) **Should IP-I be made eligible to obtain Wireless Telegraphy Licenses from Wireless Planning and Coordination (WPC) wing of the DoT for possessing and importing wireless equipment? What methodology should be adopted for this purpose?**

BSNL Comments: IP-I may be made eligible for obtaining license for import of wireless equipment as per DoT letter no. L-14047/15/2018-NTG dated 18.09.2019, provided these are brought under licensing regime.

- v) **Should Microwave Backbone (MWB) spectrum allocation be permitted to IP-I for establishing point to point backbone connectivity using wireless transmission systems?**


BSNL Comments: Yes, the Microwave Backbone (MWB) spectrum allocation may be permitted to IP-I for establishing point to point backbone connectivity using wireless transmission system provided these are brought under licensing regime.

- 3) **In case the answer to the preceding question in part (1) is in the negative, then suggest alternative means to facilitate faster rollout of active infrastructure elements at competitive prices.**

BSNL Comments: Not applicable

- 4) **Any other issue relevant to this subject.**

BSNL Comments: No comments


30.9.19
(Ved Prakash Verma)
AGM (Regulation-II)