

COMMENTS ON TRAI CONSULTATION PAPER NO.9/2011 DT. 26 DEC 2011

Date: Monday 30th January 2012

To:

Shri Sudhir Gupta, Pr. Advisor (MS), TRAI,
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
JawaharLal Nehru Marg (Old Minto Road), New Delhi-110002
Telephone No: +91-11-23220018,
Fax No: +91-11-23212014
Email: pradvmn@traigov.in

From:

Francois Retif,
Director Innovation Lead, Category Home Communication
BG Lifestyle Entertainment
Philips Consumer Lifestyle
5/F, Philips Electronics Building,
5 Science Park East Avenue,
Hong Kong Science Park,
Shatin, New Territories, Hong Kong
Mobile: +852 9221 7360
Email: francois.retif@philips.com

Subject: Comments on TRAI Consultation Paper No. 9/2011

“Allocation of Spectrum Resources for Residential and Enterprise Intra-telecommunication Requirements/ Cordless Telecommunication Systems (CTS)”.

Company presentation

Royal Philips Electronics of the Netherlands is a diversified Health and Well-being company, focused on improving people’s lives through timely innovations. As a world leader in healthcare, lifestyle and lighting, Philips integrates technologies and design into people-centric solutions, based on fundamental customer insights and the brand promise of “sense and simplicity”. Headquartered in the Netherlands, Philips employs over 120,000 employees with sales and services in more than 100 countries worldwide. With sales of EUR 22.3 billion in 2010, the company is a market leader in cardiac

care, acute care and home healthcare, energy efficient lighting solutions and new lighting applications, as well as lifestyle products for personal well-being.

Category Home Communication (HQ in Hong Kong) is part of the Lifestyle Entertainment (HQ in Hong Kong) within the sector Philips Consumer Lifestyle (HQ in Amsterdam). Category Home Communication design and market a wide range of residential telephones including DECT Phones for different region like: EMEA, LATAM, APAC, MEA and China.

More info on Philips can be found at: <http://www.philips.com/about/company/index.page>
<http://www.philips.com/about/company/businesses/consumerlifestylehighlights/index.page>

Philips Consumer Lifestyle has been selling DECT phone from past 17 years in the various parts of the world including Europe, LATAM, APAC, MEA and China. More info on the DECT products from Philips can be found at:

http://www.support.philips.com/support/catalog/products.jsp?_dyncharset=UTF-8&country=&categoryid=PHONES_ONE_HANDSET_SU_NL_CARE&userLanguage=en&navCount=1&groupId=&catalogType=&navAction=push&userCountry=nl&title=One+handset&catId=PHONES_CA_NL_CARE

Philips Electronics India Limited, a subsidiary of the Netherlands-based Royal Philips Electronics, is the leading Health and Wellbeing company. Philips has been operating in India for over 75 years and employs over 4,500 employees around the country. The company has an excellent pan India distribution and after-sales service network. As one of the nation's most well-known and well-loved brands, Philips is a part of practically every Indian's life, Philips stands as a source of easy to use, trendy and innovative internationally acclaimed products with superior design and technology that enhance the quality of consumers' professional and personal lives.

Philips Electronics India Limited through its R&D centre, Philips Innovation Campus (PIC) in Bangalore has been actively participating in the DECT for India activities - being an active contributor in increasing the awareness about DECT through DFI forum (<http://www.dectforumindia.in/>) and conducting local seminars on DECT (<http://www.dectforumindia.in/sem1011.pdf>)

More info about Philips India and PIC can be found:

<http://www.india.philips.com/about/company/india/companyprofile.page>
<http://www.bangalore.philips.com/html/index.asp>

Issues for Consultation

3.1 Whether the current allocation of spectrum for CTS is sufficient to meet the requirements? If not, then how to meet the demand of cordless telephony spectrum requirements?

All consumers all over the world deserve a very good calls quality with freedom of move at home and at office without interference and in a secured way at an affordable price for all.

Telephones using the ISM band can be affordable but the quality is subjected to the interferences issued from the equipments transmitting in the same band (microwave oven, Wi-Fi, Bluetooth etc...), the satisfaction of the end-user is not guaranteed.

Therefore, the reserved de-licensed 1880 – 1900 MHz band meets all the end-user requirements:

- security of the call and low power transmission (SAR < 0.1W/Kg)
- high sound quality with not interference
- Freedom of move (300m outdoor, 50m indoor)
- affordable price (worldwide standard means mass production phones)
- simple to use

3.2 In view of the availability of cellular mobile services in the country and possibility of Fixed Mobile Convergence (FMC), is there any need to have DECT Phones?

Cellular mobile service is a personal communication device on the move but DECT phone is the communication device used in the private space at home or at office. It provides comfort (clear voice and good ergonomic) and security with no interference.

DECT phone is used by all the family members as well to share moments in a comfortable and affordable way. Furthermore, thanks to the multiple handsets linked to a single base station, DECT allow conference calls with different parties in house or in office.

DECT is a complementary technology to the cellular mobile service.

3.3 Is there any requirement of allocating spectrum for digital CTS, in view of similar solutions being available in already de-licensed band 2.4 & 5.8 GHz?

To allow very good quality of service for the end user, it is very important to allow 20MHz band for the DECT (1880-1900 MHz), this is mandatory to have a

perfect dynamic channel selection mechanism for the benefit and comfort of the end user.

3.4 Whether de-licensing of the spectrum for digital CTS applications will be the right path?

De-licensing the band 1880-1900 MHz will create a real momentum for all the private communications at home and at office. This will create a dynamic for all the actors in the domestic phones industry (end-users, retailers, manufacturers...). This will also avoid having to many different offers which are not always fitting the end-users needs, DECT phones will mean comfortable, qualitative, secured and affordable device to communicate in your private area.

3.5 Do you agree that the 1880-1900 or 1910-1920 MHz band (TDD Mode) be allocated for digital CTS applications? If yes, what should be the limits of emitted power (EIRP), power flux density (pfd), antenna gain etc?

YES, the existing DECT technology (TDD, TDMA with an NTP @ 24dBm, antenna gain < 12dBi), following the same specifications than the ETSI EN 301 406 has demonstrated since 20 years its efficiency and it is well adopted all over the world.

3.6 Do you see any coexistence issues between existing cellular systems using adjacent band with low power CTS allocations in 1880-1900 or 1910-1920 MHz band?

The DECT system following the ETSI EN 301 406 has proven its robustness with the existing adjacent bands and co-exist perfectly well with cellular systems both in 1880-1900 or 1910-1920 MHz band.

3.7 Whether the de-licensing of either 1880-1900 MHz or 1910-1920MHz band for low power CTS applications will result in loss of revenue to the government?

This de-licensed band should create a new dynamic in the market and the government should benefit extra revenue linked to the taxes and duties generated by the sales of the telephones.

On top of, SMS on fixed line can be also another source of revenue if this service is allowed on fixed line.

3.8 Will there be any potential security threat using CTS? If yes, how to address the same.

Between the base station and the handset, DECT technology uses ciphering and authentication mechanism with high security level to guaranty secure private communications.

3.9 Amongst the various options of digital technologies available to meet the cordless telephony requirements, either spectrum allocation can be considered according to technology or the etiquettes/ specifications can be defined for the de-licensed spectrum band. What method of allocation of spectrum for digital CTS applications should be adopted?

A defined etiquette based CTS is the only practical option. Some of the etiquette parameters have already been defined by WPC in its Note 57 to the NFAP-2011. Other etiquette parameters could be added with the objective of de-licensing the band.