

Ref No: Inative/TRAI/CP/17-18/01
Dated: 07/04/2017Shri. Sanjeev Benzal
Advisor (NSL –II)
Telecom Regulatory Authority of India
MTNL Building
Near Zakir Hussain College
New DelhiSubject: Inputs on Ease of doing Business Telecom business in India

Dear Sir ,

We, Inative Networks P Ltd, are a PMRTS service provider offering **Digital Radio Trunking** services to various critical customers in remote areas such as Power, Mining, Industrial Plants, Oil and Gas and Ports etc. PMRTS service providers have a much smaller subscriber base but provide very critical services required for security, operation and efficiency within larger organizations .


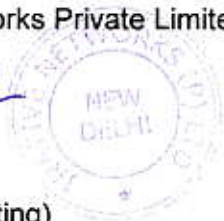
We are pleased to present our inputs in reply to your consultation paper dated 14 th March 2017 regarding subject mentioned above.

We are in the telecom industry for the last thirty years but despite our best efforts the regulatory processes have become increasingly tedious ,outdated and cumbersome .

We will feel obliged if TRAI call for an open house discussion on this subject matter .

Thanking You,

For Inative Networks Private Limited


Director (Marketing)
(Devdarsh Jain)

Enclosure: Inputs on Ease of doing Telecom Business in India

Inputs on “Ease of Doing Telecom Business in India” for PMRTS Telecom Service Providers

1. Mandate on use of Digital technology by regulator

We believe that there is requirement for adoption of newer Digital technology by PMRTS Service Provider also in line with other telecom operators and service providers. For this reason, it is requested that the DOT/WPC must promote the adoption of OPEN standard Digital technologies for the PMRTS Service Providers as in line with “Digital India” policy. Also, the regulator must support and promote migration of Analog technology to Digital for existing PMRTS Service Provider. Adoption of digital technology will ensure:

- Feature rich services
- Easy integration to other networks
- Spectrum efficiency (up to 4 times)
- Security including Authentication of subscriber terminals
- Easier Monitoring of Subscribers

Just like in other countries, there should be a formal date by when ideally all the customers must migrate to Digital technologies.

2. Online Application/Grant of License and Permissions

It is seen that most of the current application and approval/grant of licenses, permissions and other compliances are all offline. Therefore, the PMRTS Service Provider have to continuously pursue for processing of its requests and submission of compliances from time to time. Instead, it is requested strongly that all application and approval must

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happen ONLINE through a web portal interface. This will ensure easy submission and time bound processing of our applications.

3. Addition or Surrender of Authorization in UL

As all compliances are already verified and all due diligence done for the Telecom Service provider before issue of Unified License, it is requested that the Additional or surrender of a particular Authorization in the UL should be allowed to be done ONLINE and application must be processed in a time bound manner preferably within 4 weeks.

4. Assignment of Spectrum for PMRTS

The main and very grave issue faced by the PMRTS industry is the lack of clarity on the allocation of spectrum since 2012. Initially, spectrum was issued on the basis of OM with certain undertakings from the PMRTS Service providers. It is requested that assignment for spectrum for CMRTS and PMRTS should be done under the same policy. If the spectrum is allocated administratively, then it should be done under a time bound manner on the basis of online application. In case, the DOT or WPC allocates spectrum on auction basis this should be done in a time bound manner.

5. SACFA Clearance

SACFA clearance takes lot of time and sometimes perusal with SACFA members. This should be made online and be processed within a defined time. We have also been told verbally by some SACFA members that there is a need for DGPS readings of the site locations. The procedure for this must be simplified and preferably be made part of issue of spectrum or Decision Letter from WPC.

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6. Wireless Operating Licenses

The need for separate Operating License – It has been noticed that recently, the need for Operating License has been done away with for the Access Service Providers. This should be done for all the Service Providers under Unified License.

7. Obtaining Import License

Currently, all Network Equipment, Repeaters and Subscriber Terminals can be imported subject to Import License issued by Regional Licensing Office (RLO). While it is requested that a clear and transparent policy be made and circulated to all RLO so that issuance of Import licenses is not subject to individual interpretations.

Furthermore, it is proposed that the Import of Subscriber Terminals must be exempted from Import License such as the Subscriber Terminals for Cellular devices.

We understand that in the past, there has been a security concern that since the Trunking Walky-Talky could be used for One to One Communication without affiliating to a Trunking network, the subscriber radio terminals may be used for communication by unauthorized and illegal agencies. However, such a perception is unfounded in today's world where even cellular phones can be used to communicate with each other without subscribing or affiliating to a cellular network.

Furthermore, if any security related threat exists, then there can be a mandatory requirement for all PMRTS operators to disable One to One Calls (Direct Mode) which allows calls without the need for affiliating to the Trunking network. This is easily done by settings done in the Subscriber Radio Terminals.

However, by now allowing easy import of the Subscriber Radios, creates a very big problem for growth of the PMRTS Industry.

8. Restriction on number of subscriber terminals for import

An OM was issued by the Department of Telecom which restricts the import of PMRTS Subscriber Radio Terminals to 90 for Analog and 180 for Digital for a particular frequency pair allocated to the PMRTS Service Provider. (Enclosed OM from Department of Telecom). This OM restricts the number of Subscriber Radio Terminals that can be imported for a given frequency pair without considering the following –

- What will happen when subscriber will buy replacement radio terminals? How can they be bought?
- How can the customer buy the Subscriber Radio Terminals from any other supplier other than the PMRTS Service Provider? How would the DOT regulate that?
- If frequency pairs are reused within the district, then how would the PMRTS Service Provider provision Subscriber Radio Terminals? E.g. if there PMRTS Service Provider decided to re-use the same allocated frequency within a district to provide services to 5 organizations, it would potentially be only be able to import a maximum of 180 Subscriber Radio Terminals against the frequency pair allotment and therefore would not be able to provision more than 35 radio terminals each to each organization. This restriction affects the growth and even viability of the PMRTS Service Provider.

9. Issue of Captive Licenses to private customers where PMRTS services are available

It is seen that DOT issues CMRTS Licenses for Captive deployments to customers freely in areas also where PMRTS services are available. While it is a decision of the customer whether to opt for CMRTS or PMRTS Services, there is a need for schema to ensure that Captive licenses are granted only in special requirements if already PMRTS Services are available. This will help make the PMRTS Services more viable and support the adoption countrywide.

10. Allocation of additional spectrum

The PMRTS License Agreement mandated a minimum of 25 frequency pairs for each telecom circle. Additional frequency pairs may be applied for and granted on the basis of justified requirements.

However, in the revised Unified License (UL) policy, there is no mandate to allocate a minimum frequency pairs. Ideally, the PMRTS Service Provider should be allowed to start with initial allocation of 2 frequency pairs. It should be easy for the PMRTS Service Provider to apply and be allocated additional frequency pairs. It is also requested that there should be a clear policy of spectrum re-use as sometimes the PMRTS frequency allocation is seen as similar to CMRTS allocation and therefore allowed to be used in only a particular location. However, this defeats the basic policy of spectrum re-use and therefore the PMRTS Service provider should be allowed to re-use the spectrum within the telecom circle.

11. Policy for deactivation/disposal of Radio terminals

There should be an easy and practical policy for deactivation or disposal of Subscriber Radio Terminals. Generally, the end user will buy the Subscriber Radio Terminal either from the PMRTS Service Provider or other suppliers. The end user will subscribe to the PMRTS Service from the Service Provider. However, after a defined tenure, it may be that either the Subscriber Radio Terminal becomes faulty or the end user wants to de-activate the Subscriber Radio Terminal and not subscribe to the service any longer. In this case, there should be an easy way for the PMRTS Service Provider to be able to report this information to the DOT/WPC. Also if the PMRTS Service Provider enrolls new subscribers, then it should be allowed to import more Subscriber Radio Terminals. Having a limit on the number of Subscriber Radio Terminal that the PMRTS Service Provider can import over a number of frequency pairs is impractical and severely affects the business of the PMRTS Service Provider.

12. Time bound approval

It is also requested that time bound approval of all applications and requests or renewals be done. Otherwise, it is also proposed that the application within a specified time frame be deemed approved.