urgent

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The Chairman,
Telecom Regulatory Authority Of India
Mahanagar Door Sanchar Bhavan ,
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Sir,

COMMENTS ON CP ON NATIONAL BROADBAND PLAN

1   It is essential to identify the ***factors responsible for low penetration*** to ensure that these do not stall the future growth. These are :

A]   ***Policy Maker & Regulator's*** absence of vision, planning and inertia. There was NO WILL & roadmap till date.

B]   **BSNL**. Its failure to UTILISE ITS VAST resource in wire lines to extend broadband. Due to its work culture , whatever new numbers   it added, more old subscribers surrendered their connections.

C]   ***Failure to ENFORCE internet telephony*** which was the most potent trigger and application for expansion of broadband. Not only the subscribers lost the service, VAST RESOURCES of ISPs were wasted.

2   Environment

Policy makers have to CREATE CONDUCIVE ENVIRONMENT - policy, regulation , infrastructure , FORWARD LOOKING , FREE from BIAS and EARN TRUST of stake holders-. . Presently all this is missing.

3   It is major challenge. Every possible RESOURCE need be EXPLORED & UTILISED to Achieve the target and MOVE THE COUNTRY forward.

4   BB numbers will depend on UTILITY which is associated with APPLICATION . Application dictates SPEED.

5   Fiscal Measures

Fiscal   support   is needed at EVERY STEP- infrastructure, service provider and subscriber. As SUBSCRIBER is the key in growth, affordability will decide the RATE of Growth and Numbers.

To attract subscriber to BB, CPE need be cheap and the subscription cheaper. For this FISCAL MEASURE are must. Downloading up to 1 GB be free[service provider be paid from USO]   and nominal rate above that. This can not be overlooked considering the achievement of developed countries who employed such support [KOREA] and some resorting to it now[UK & EUROPE].

Present DOWNLOAD rates and absence of metering is great DETTERENT to growth -- and subsequently move to UNLIMITED download WHICH IS PREVALENT world OVER..

Our views on issues for consideration are at annexure.

Yours Sincerely,

Col S N Aggarwal-Veteran
Telecom Consultant & Consumer Activist

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

A] **CREATION** *of Public Awareness on its POTENTIAL, especially effecting YOUTH & GENERAL Applications eg ON LINE APPLICATIONS for Job, RAIL eticketing, and others which will reduce THEIR MOVEMNT & EXPENSES . General benefit and EFFECT on POCKET will attract population.*
B] *eGovernance---- On line information by egovernance will ATTRACT majority . This includes Administrative & legal issues. STATE has to be SINCERE and TRANSPATEN in working. This will eliminate DISTRUST.*

C] **_Affordability T_**_his is the MOST CRITICAL factor. Indian CONSUMER is VERY SENSITIVE towards price which has been proved repeatedly—mobile numbers and cable TV._

Most REDICAL STEP is needed. Use of USOr to subsidise service providers upto 2GB download.

The GOVERNMENT must invest in this as a measure needed for GDP GROWTH & ADMINISTRATIVE REFORM

5.2 What, according to you, will improve the perceived utility of broadband among the masses? (Reference Para 2.23)

A] *The GOVERNMENT SERVICES-- Public is harassed getting information and submitting application. eGovernance   will be major UTILITY—information, documentation, payment of taxes—municipal, electricity, water etc. This will be a great RELIEF for the public as has been experienced by the launch of on-line Tickets by RAILWAYS.*

B} *Trading—on line selection, comparative rates, order and payment.*
C] *Travel—on line transport & hotels . Easy travel will BOOST TOURISM*

The perception that broadband will enable SAVE TIME, EFFORT and above ALL ELIMINATE QUEUE AND   SAVE from travel is GREAT TRIGGER.

5.3 What measures should be taken to enhance the availability of useful applications for broadband? (Reference Para 2.23)

a] Government Departments must TAKE A LEAD in providing ONLINE INFORMATION ands SERVICE.
*   BETTER COLLECTION of TAXES & SMALLER QUE in front of their office should be driving factors.*
b] Content providers MUST create websites to provide COMPARATIVE DATA for sale/ purchase of product and services as is being done air travel [cheap ticket], insurance companies[policy bazaar] etc.
c] Reduction in MARKETING & ADMINISTRATIVE expenses should encourage the supplies if goods/ services .

5.4 How can broadband be made more consumer friendly especially to those having limited knowledge of English and computer? (Reference Para 2.23)

Most of the commercial websites are user friendly and people with limited knowledge also use it. One this BUG bites, this may become a tool / instrument towards increasing ENGLISH knowledge .

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

We do not agree with projected growth & requirement. By restricting the target, we are playing with the GROWTH of the country. Country needs EXPONENTIAL GROWTH and not linear. This calls for INNOVATIVE IDEAS , FREEDOM from BUREAUCRATIC SHACKLES , FREEDOM from BIAS/ FAVOUR towards select group of service providers, MULTIPRONG EFFORT . It must involve every one USER & PLANNERS.

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).

INADEQUATE infrastructure is a STARK TRUTH. Why any agreement or certificate needed from stake holders.
YES- the people responsible for this are POLICY MAKERS and the REGULATOR without vision, planning and ACTION. It seems they were gripped with INERTIA.

A] OFC need and importance can not be UNDERMINED.
B] Besides service providers, RailTel, Power Grid and GAIL have vast network of Optical Fibre Cable. This is the national asset and must be JUDICIOUSLY utilized.
C] Wireline resources of BSNL & MTNL must be treated as NATIONAL resource.
D] BSNL/ MTNL must and private service providers must create a JOINT CORPORATE for utilization of these line resources.

In UK/ Europe, Orange can hire a pair from BT to provide broadband. BSNL has failed to use its NATIONAL resource for BROADBAND.
E] Laying of OFC on war footing as there is NO DERTH OF FUNDS earned from 3G & BWA.
F] Wireless must be the DRIVING force. Hence TOWERS construction for BWA & #G.

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 requirement is SO LARGE that every technology has to contribute towards GROWTH.A comprehensive ROADMAP need be drawn to evaluate and implement the plan.
Priorities as under be considered:
A] Use of EXISTING resources--- LANDLINES of BSNL & MTNL
B] Vast NETWORK of OFC owned by GAIL, Railtel , Powergrid and Service Providers
C] It was MOBILE PHONES responsible for increase in teledensity. Like wise BWA- must be

Fully EXPLOITED for FASTER LARGER number of BB connections.
D] 3G potential for reason of UTILITY and COST .
E]   Development of NATION WIDE OFC network can not be over emphasized . Policy makers must OVERCOME the inertia & slumber and ACT TOPSPEED to spread it as FUNDS CRUNCH is not there any more.

Money collected from 3G & BWA must be UTILISED   for GROWTH & PROMOTION.

5.8 What actions are required to ensure optimal utilization of existing copper network used to provide wireline telephone connections? (Reference Para 3.22)

These are NATIONAL ASSETS. BSNL & MTNL have failed to utilize. Hence a JOINT CORPORATE BODY be constituted for   their use by ANY BB service provider . Incumbents may be paid tariff for this as is done worldwide.

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)

For the country to be ECONOMIC POWER in the coming DECADE, business activity will increase many fold. To support this , HIGH SPEED BROADBAND is a must which OFC alone can provide.

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)

Cable Operators are REAL ENTERPRENEURS . Their WILL & RESOURCE must be correctly harnessed
for BB penetration. Regulatory changes needed are
a] Create a SEPARATE license for BROADBAND for ISP 7 Cable TV
b] Liberate them from UASL license barrier .
c] Declare them as INFRASTRUCTURE for BB

This NATIONAL asset can do WONDERS for us.

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)

With WiMax and LTE , all barriers are SELF CREATED and IMAGINERY. AGGRESSIVE drive to achieve targets is a MUST.

5.12 If so, is there a need to create national optical fibre network extending upto villages? (Reference Para 3.39)
 There is need for NATIONAL OPTICAL FIBRE network , extending up to villages. This must not BECOME THE EXCUSE for STALLING ACTION and DENIAL of BB to RURAL population.

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)

A] Major UTILITY is e governance. Hence a coordinated effort is VITAL.
B] PPP is considered as more appropriate than government agency.
C] With the experience and expertise acquired in BUILDING 7 MANAGING of brigdes and FLYOVERS, this too can be handled in PPP mode.
D] Time frame being MOST IMPORTANT, nothing else will work better.

5.14 Among the various options discussed in Para 3.35 to 3.37, what framework do you suggest for National Fibre Agency for creating optical fibre network extending upto village level and why? (Reference Para 3.39)

PPP is best suited as the STAKE HOLDERS involvement makes all the difference. This MUST have , centre, states, service providers and BUILDERS in consortium.

5.15 What precautions should be taken while planning and executing such optical fibre network extending upto villages so that such networks can be used as national resource in future? What is suitable time frame to rollout such project? (Reference Para 3.39)

A] While planning, existing resources must be taken into account to PREVENT WASTE of effort.
B] Ensure ROW does not become an OBSTACLE.
C] 3 Years is the IDEAL time frame . Delhi Metro and IGI terminal 3 must be the MOTIVATING projects for timely implementation.

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)

Yes. As stated earlier , speed available from different technology is not the same. OFC will provide the highest followed by LTE & WiMax. The least is by 3G

There is tendency to confuse PORTABILITY with Mobilty. As we move forward, country will have more LAP TOPS, indicating the emphasis on PORTABILITY.

Our mobile phones experience is CHEAP PREPAID for high tele density. Like wise the secret of growth lies in WIRELESS based BB with AFFORDABLE RATE.

With CHANGING UTILITY pattern, 256 kbps is not enough. We must aim at min of Imbps.

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)

As stated above, it should be 1MBPS.

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 is a major obstacle & great challenge. States disinterest was NOTICED while requesting AUTHORISED OFFICERS for Cable TV. However as eGOVERNANCE concerns states and centre both, statewise ONE WINDOW clearance need be created.

AS stated earlier, AWARENESS about BB and eGovernance is VERY VERY IMPORTANT. Probably, IT ministry has to step in and educate GOVERNMENT OFFICIALS followed by the public.

Without awareness , COMMITMENT can not induced.

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

There is no competition what so ever. Availability, affordability QoE are at the lowest . This can be enhanced by FASTER role out of BWA and COST MANAGEMENT of various factors stated.

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)

Usage Charges are great hindrance. The solution lies-a] Introductory 1GB free [subsidized by USO / administrative reforms measure]   b] Gradually move to UNLIMITED DOWNLOAD as the utility and USAGE patterns will grow to higher GB.

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

YES. But it must relate to UNLIMITED usage.

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

YES.

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

A] Provision for metering. Presently user does not know. Because of HIGH RATE , he uses with CONSTRAINT.
B] As suggested, 1GB free. Nominal rate above that.
C] Gradually move to UNLIMITED DOWNLOAD with FLAT subscription.

5.24 How can utilization of International Internet bandwidth be made more efficient in present situation? (Reference Para 4.42)

        A]   **Mirroring FREQUENTLY visited sites with in service providers network.**
        B]   **Content Hosting WITHIN he country**
        C]   **Extensive USE of NIXI**

5.25 How can use of domestic and international internet bandwidth be segregated? Will it have direct impact on broadband affordability? If so, quantify the likely impact. (Reference Para 4.42)

If separated, it will EFFECT the cost and IMPROVE the QoE.
Deliberations between SERVICE PROVIDES, DoT and REGULATOR are needed.

5.26 What steps should be taken to bring down the cost of international internet bandwidth in India? (Reference Para 4.48)

Growth will provide ECONOMY OF SCALE and enable service providers to buy BULK. A coordinated effort is needed.

5.27 How can competition be enhanced in the International bandwidth sector? (Reference Para 4.48) can competition be enhanced in the International bandwidth sector? (Reference Para 4.48)

It is matter of DEMAND and UTILITY. Once the numbers reach THRESHOLD, all these issues will become EASY to resolve.

5.28 QoS of broadband, availability of bandwidth, adherence to given contention ratio, affordability, availability and spread are some intricately linked parameters. In your opinion what should be done to ensure good quality broadband to subscribers? (Reference Para 4.59)

a] Existing parameters are JUST NOT ADEQUATE
b] DOWNLOAD speed is o paramount speed.
C] Other parameters need be EVOLVED for better QoE.

5.29 Do you think that bad quality of broadband connection is impacting the performance of bandwidth hungry applications and hence crippling the broadband growth? If so, please suggest remedial actions. (Reference Para 4.59)

YES. Impact on applications has , in turn, impacted the utility of BB as seen by subscribers and further growth. NO piecemeal effort can provide solution. We must address from EVERY ANGLE.

5.30 Is there a need to define new/redefine existing quality of service parameters considering future bandwidth hungry applications, time sensitivity of applications and user expectation? What should be such parameters including their suggestive value and should such parameters be mandated? (Reference Para 4.59)

Yes. This is BEING EVOLVED and premature to suggest specific parameters.

5.31 What measures do you propose to make Customer Premises Equipment affordable for common masses? Elaborate your reply giving various options. (Reference Para 4.64)

A]   *Reduction in TAXES on CPE and FISCAL INCENTIVES to manufacturers*
B]   *Availability on INSTALLMENT*
C]   *Bundelling with BB SERVICE by service providers*

5.32 What measures are required to encourage development of content in Indian vernacular languages? (Reference Para 4.68)

        No comments

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

YES. It must be liberated from UASL . ISP , Cable operators and BWA service providers may be ISSUED A NEW license called BROADBAND LICENSE.

5.34 Are there any specific competition and market related issues that are hindering growth of broadband? (Reference Para 4.71)

A]   *Affordability is POOR.*
B]   *Billing is done on DOWNLOAD , rats of which are high .*
C]   *QoE is dismal*
D]   *BSNL , the largest service provider has very POOR RECORD OF SERVICE. Instaed of attracting MORE, existing subscribers are RUNNING AWAY.*

5.35 What other fiscal/non-fiscal measures should be considered to boost broadband penetration?

A]   *FISCAL measures at every STEP - infrastructure, equipment [network & CPE] , subscription.*

B]   *USE of USO & Income from 3G and BWA may be utilized.*

C]   *Flat subscription for UNLIMITED DOWNLOAD will work wonders.*

D]   *Subsidy for SUBSCRIPTION to service providers will be a CATALYST.*

NON FISCAL--- Nation wide AWARENESS DRIVE is prerequisite for MOVE FORWARD .