

## Spectra's response on consultation Paper on Review of Scope of Infrastructure Providers Category-I (IP-I) Registration

### Issues for Consultation:

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

#### Response:

Yes, IP-I should be allowed to create and own active infrastructure.

The demand for capacity has gone exponential growth. Whereas Optical Fiber cable capacity has not grown due to various issue of road digging, restoration, right of way charges etc.

There is huge scope of creating large capacity by using high speed end equipment. DWDM equipment further allows manifold enhancement of capacity. This would enable much better viability of telecom capacity networks. Capacity utilization of end equipment would also go up. This would lead to lowering the per unit cost e.g. lower cost of transporting per GB.

Any services from this infrastructure should only be permitted to be given to Licensed Service Providers, limited to UASL/CMSP, ILDO and NLDO. All terms and conditions as applicable to category of service provided by Licensed Service Provider should also be applicable to IP-I for the specific service. All compliances e.g. circuits reporting to Licensor and TRAI for the service provided should be responsibility of IP-I provider. Quality of Service norms should be equally applicable to IP-I as for Licensed Service Provider.

AGR as applicable to Licensed Service Provider for the category of the service should be applicable and payable by IP-I provider. Charges paid to IP-I provider should be available for deduction while computation of AGR by Licensed Telecom service providers limited to UASL/CMSP, ILDO & NLDO.

There is need to ensure 'Same Service, Same Rules'.

#### **spectra.co**

Shyam Spectra Private Limited  
(formerly known as Citycom Networks Private Limited)  
Registered Office: A-60, Naraina Industrial Area,  
Phase-1, New Delhi, India 110028

Corporate Office: 3rd floor, Plot 21-22, Phase IV,  
Udyog Vihar, Gurgaon, India 122015  
CIN: U72300DL2008PTC177873

T: +91 124 7116700  
E: info@spectra.co

**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.**

Response:

IP-I Owned telecom infrastructure to include but not limited to end equipment of Cable connectivity, Routers, switches, Multiplexers, Wireless Nodes.

Infrastructure services to be provided only to UASL/CMSP, ILDO & NLDO and for category of service as allowed to these Licensed Service Provider.

- 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.**

Response:

Infrastructure services including end to end bandwidth to be provided only to UASL/CMSP, ILDO & NLDO and for category of service as allowed to Licensed Service Provider.

All compliances e.g. reporting to Licensor and TRAI for all circuits/links provided should be responsibility of IP-I provider. AGR as applicable to Licensed Service Provider for the category of the service should be applicable and payable by IP-I provider.

- 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.**

Response:

We believe registration conditions would need explicitly allowing sharing of active infrastructure.

**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?**

Response:

Yes. IP-I be made eligible to own and obtain Wireless Telegraphy Licenses from Wireless Planning and Coordination (WPC) wing of the DoT for owning and possessing of wireless equipment.

Methodology: There should be fulfilment of condition the such Wireless equipment is feasible and currently usable by Licensed Service providers.

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

Response:

WPC spectrum allocation should only be allowed to Licensed Telecom service providers.

**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.**

Response: Not Applicable

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

Response: Same Service Same rules has to be strictly followed.

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