

**From:** [hupadhyay@consumer-voice.org](mailto:hupadhyay@consumer-voice.org)

**To:** "Sh. Sunil Kumar Singhal" <[advbbpa@traf.gov.in](mailto:advbbpa@traf.gov.in)>

**Cc:** "RAJENDRA KUMAR" <[ja3-nsl@traf.gov.in](mailto:ja3-nsl@traf.gov.in)>, [sriramkhanna@yahoo.co.in](mailto:sriramkhanna@yahoo.co.in)

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**Subject:** VOICE Comments on "Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed"

To,

Shri Sunil Kumar Singhal, Advisor (Broadband and Policy Analysis),

TELECOM REGULATORY AUTHORITY OF INDIA

MAHANAGAR DOORSANCHAR BHAWAN,

JAWAHAR LAL NEHRU MARG, NEW DELHI-110 002

[advbbpa@traf.gov.in](mailto:advbbpa@traf.gov.in) with a copy to [ja3-nsl@traf.gov.in](mailto:ja3-nsl@traf.gov.in)

**SUBJECT: VOICE Comments on "Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed"**

*Voluntary Organisation in Interest of Consumer Education (VOICE) is a consumer protection group set up by teachers and students of Delhi University in 1983.*

We at VOICE as part of our advocacy initiative in Telecommunications continuously raise different issues with Policy makers impacting consumers based on the knowledge through Consumer feedbacks.

As a registered CAG we are in forefront of providing inputs to the Government, Regulatory authorities, consumers and business community at large related to consumer concerns and interests.

In continuation of this effort on behalf of consumers we at VOICE have following COMMENTS on "Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed"

**1. What should be the approach for incentivizing the proliferation of fixed-line broadband networks? Should it be indirect incentives in the form of exemption of license fee on revenues earned from fixed-line broadband services, or direct incentives based on an indisputable metric?**

*Some thing similar to the prevailing Production Linked Incentive (PLI) can be tried to targeted nos. scheme can be devised with telescopic incentive cum disincentive for achieving the Fixed Broadband (FB) deployment targets which meet overall national FB growth plans. These can be further divided into say Urban, semi-urban and rural targets with different incentive cum penalty rates.*

**2. If indirect incentives in the form of exemption of license fee on revenues earned from fixed-line broadband services are to be considered then should this license fee exemption be limited to broadband revenue alone or it should be on complete revenue earned from services delivered through fixed-line networks?**

*Exempting license fee will entail too many checks and balances and it still is prone to be misused and possible litigations with loss of revenue a distinct possibility. Suggestion given against Q1 will give better results where outcome can be directly related to the incentive.*

**3. In case of converged wireless and fixed-line products or converged services delivered using the fixed-line networks, how to unambiguously arrive at the revenue on which license fee exemption could be claimed by the licensees?**

*As explained above, license fee exemption is too cumbersome, will create too many disputes and it may not achieve the ultimate objective. It is better to go in for target-based incentive cum penalty scheme. As will be explained later this regime should also be integrated with consumer incentive-DBT.*

**4. What should be the time period for license fee exemption? Whether this exemption may be gradually reduced or tapered off with each passing year?**

*In place of time period, it should be based on no. of connections/ penetration achieved that too district-wise. Against current penetration of only 8.93 per 100 households let us continue with this scheme till we achieve say 25 households per hundred.*

**5. Is there a likelihood of misuse by the licensees through misappropriation of revenues due to the proposed exemption of the License Fee on the revenues earned from fixed-line broadband services? If yes, then how to prevent such misuse? From the revenue assurance perspective, what could be the other areas of concern?**

*Not applicable with suggested alternative.*

**6. How the system to ascertain revenue from fixed-line broadband services needs to be designed to ensure proper verification of operator's revenue from this stream and secure an effective check on the assessment, collection, and proper allocation and accounting of revenue. Further, what measures are required to be put in place to ensure that revenue earned from the other services is not mixed up with revenues earned from fixed-line broadband services in order to claim higher amount of incentive/exemption.**

*Targets achieved by the service providers can be verified by their monthly reports, quarterly verification by DoT thr' a dedicated call centre and 6 monthly audits in new proposed regime.*

**7. Is there any indisputable metric possible to provide direct incentive for proliferation of fixed-line broadband networks? What would be that indisputable metric? How to ensure that such direct incentives will not be misused by the licensees?**

*Yes, as outlined above we can deploy a dual strategy (both to support supply side and create demand) of incentive cum penalty scheme for service providers (SPs) and simultaneously provide Direct Benefit Transfer (DBT) for the subscribers.*

*For the SPs it should be a target-based incentive/penalty for say 3 years for achieving quarterly deployment targets to achieve a penetration of 25% households. This can be decided either by allocation or by a bidding process for minimum 3 SPs per district asking for minimum support and highest target penetration.*

*For subscribers a penetration DBT should be implemented to increase demand. For example, if the current tariff is taken as a base, till a penetration level upto 5%- DBT can be 50%; between 5-10%-DBT can be 40%; between 10-15%-DBT can be 30%; between 15-20%-DBT can be 25%; and nil DBT once 25% penetration is achieved.*

*As can be seen, in this proposed scheme incentives are directly transferred to the subscriber after due verification in two stages so misuse is possible.*

**8. What are key issues and challenges in getting access to public places and street furniture for installation of small cells? Kindly provide the State/ City wise details.**

*Main issue is lack of commitment and responsibility among local govt. officials. A major change is required in the law to make communication services as essential services and hold local govt. as well as other govt./semi-govt. agencies (like metro, railway, Local Development agencies-LDA, NOIDA, Airports, municipal corporations, zila parishads etc.) responsible for providing / facilitating required infrastructure / access to SPs.*

**9. How to permit use of public places and street furniture for the effective rollout of 5G networks? Kindly suggest a uniform, simple, and efficient process which can be used by States/ Local-Bodies for granting access to public places and street furniture for installing small cells. Kindly justify your comments.**

*It being an essential public requirement – almost like part of human right to access and communicate, it will be really effective if the collector of each district is made responsible to ensure availability of required infrastructure and facilities to SPs.*

**10. Which all type of channels of communication should be standardized to establish uniform, transparent, and customer friendly mechanisms for publicizing provisioning of service and registration of demand by Licensees?**

*A dual channel can be prescribed for limited period of 5 years, the second channel may be managed by say DoT or TRAI. Apart from approaching a SP for a connection, subscribers can also book a connection with this alternate channel. At the same time all sales booking by SPs also are merged to the DoT database for monitoring. Updates to connection status will be provided by SPs at prescribed interval for monitoring as well as for audit purpose for incentive/penalties and DBT.*

**11. Whether proliferation of fixed-line broadband services can be better promoted by providing Direct Benefit Transfer (DBT) to subscribers of fixed-line broadband services? If no, elucidate the reasons.**

*Yes, as detailed above a DBT scheme is definitely possible which can be directly linked to the actual fixed-line broadband services provided to subscribers.*

**12. If answer to Q11 is affirmative, then:**

**I. Should DBT scheme be made applicable to all or a particular segment of fixed-line broadband subscribers? Kindly justify your comments.**

*As outlined above, DBT scheme will be for a district linked to level of penetration and will be applicable to all subscribers.*

**II. If you recommend supporting a particular segment of fixed-line broadband subscribers, how to identify such segment of the subscribers?**

*No, the DBT will be applicable to all subscribers in a district as explained above.*

**III. How to administer this scheme?**

*The scheme can be administered through a dedicated "Fixed Line Promotion Monitoring Cell (FLPMC)" under either DoT or TRAI. This cell will decide the targets for each district and each SP as explained above, monitor and audit subscriber data and advise disbursement of DBT as well incentives/penalties for SPs.*

**IV. What should be the amount of DBT for each connection?**

*For subscribers a penetration DBT should be implemented to increase demand. For example, if the current tariff is taken as a base, till a penetration level upto 5%- DBT can be 50%; between 5-10%-DBT can be 40%; between 10-15%-DBT can be 30%; between 15-20%-DBT can be 25%; and nil DBT once 25% penetration is achieved.*

**V. What should be the period of offer within which individuals need to register their demand with the service providers?**

*In place of time period, it should be till no. of connections/ penetration achieved that too district-wise. Against current penetration of only 8.93 per 100 households let us continue with this scheme till we achieve say 25 households per hundred.*

**VI. What should be the maximum duration of subsidy for each eligible fixed-line broadband connection?**

*In place of time period, it should be based on no. of connections/ penetration achieved that too district-wise. Against current penetration of only 8.93 per 100 households let us continue with this scheme till we achieve say 25 households per hundred.*

**13. Any other related issue.**

*Many employers reimburse the internet connection costs to their employees but only if it is in the employees' name i.e. the billing is in the name of the employee. Since it is impractical to have multiple FB connections, for households, all members of the family go for wireless connectivity. TRAI/DoT needs to put in place a protocol to resolve this issue because the employers that if they start only address-based reimbursement, there may be multiple reimbursement for the same bill.*

*One possible option is to let employees register their SPs with their employers for direct payment. This will ensure that there are no duplicate payments. But the whole system of registration/deregistration has to be convenient and quick for all involved stakeholders.*

So, we need to incentivise SPs as well as subscribers thr' DBT but in a scientific way to achieve our target penetration with District as a unit to ensure wider availability of FB / faster & wider spread of FB.

Hemant Upadhyay  
Advisor-Projects, IT & Telecom

Consumer VOICE  
M-20, Lajpat Nagar-II  
New Delhi-110024  
Ph. [011-29831121](tel:011-29831121)  
[www.consumer-voice.org](http://www.consumer-voice.org)