

## COUNTER COMMENTS TO REMARKS MADE BY OTHER STAKEHOLDERS IN RESPONSE TO TRAI CONSULTATION PAPER ON "ISSUES RELATED TO TELECOMMUNICATION INFRASTRUCTURE POLICY"

In response to TRAI's Consultation Paper on the issues relating to Telecommunication Infrastructure Policy, we would like to make the following counter comments.

1. **Diesel fuel subsidy for rural operations**: The comments that a Diesel fuel subsidy is required for operating diesel generators in rural sites on grounds of high operating costs should not be considered by the Government. If a subsidy is given, it will preserve and protect a system that has not produced the desired results for rural teledensity across so many years.

The challenge today is to take infrastructure decisions that overcome the issues posed by lack of power and make appropriate investments in that direction, rather than submitting to the status quo and finding ways to operate within it- in this case trying to keep on using diesel as the preferred alternative in the absence of electricity.

- 2. **Reduction in the customs duties for the imported equipment**: This can only ensure that indigenous efforts to manufacture are stifled, and there is a net outflow of dollars from the country. All such a recommendation can achieve, is to make imports attractive at the cost of nurturing the market for Indian product and manufacturing. Therefore the custom duty should not be lowered on the fully assembled equipments.
- 3. Reduction in the number of towers, In Building solutions and DAS: Some comments have been made with respect to these three issues where it has been said that through IBS and DAS the reduction in the number of towers would not be significant. Also fears have been raised that these technologies suffer from serious impediments and that they are better suited to new planned areas rather than in existing urban settlements. We do not agree with this point of view. These are established technologies and are being deployed globally in the networks. Govt must consider the use of such technologies to control the proliferation of towers and help to control the impact of towers on the skyline and environment of our urban settlements.