

**VIL's response to TRAI Consultation Paper no. 8/2019 on Allotment of spectrum to Indian Railways for Public Safety and Security service dated 24<sup>th</sup> June 2019**

**Q.1 Whether spectrum in 700 MHz band should be assigned to Indian Railways for RSTT in India? Please provide justification for your response.**

A1. We concur with the views of the DoT:

(i) that 700 MHz is a globally harmonized and is being used worldwide for deployment of 4G and evolution of 5G services,

(ii) that for achieving the objectives of 'Digital India', availability of sufficient spectrum is crucial,

(iii) that if spectrum from 700 MHz band were to be reserved for Indian Railways, there will be insufficient spectrum left for 4G/5G services considering that 3 to 4 service providers will be providing services in each service area, which may jeopardise the growth plans of the telecom operators, and

(iv) that frequency bands below 700 MHz are not available for allotment of IMT services in India thus making the 700 MHz band the prime band for providing better coverage in rural areas.

We submit that the available 2\*35 MHz of spectrum in 700 MHz band should be allocated and utilized **only** for IMT services.

**Q.2 In case your answer to Q1 is in affirmative, how much spectrum should be assigned to Indian Railways?**

A2. Not applicable, in view of our answer to Q1 above.

**Q.3 In case your answer to Q1 is negative, i) what are the other bands (including 450-470 MHz) in which spectrum can be assigned for RSTT, ii) how much spectrum should be assigned to Indian Railways?**

A3. At the outset we submit that no spectrum should be reserved/assigned/allocated to Indian Railways for commercial purposes to meet the communication needs of the railway passengers, which will be served through the telecom service providers' networks. The Indian Railways may avail and utilize the spectrum for their captive/internal purposes such as for passenger safety, train positioning and security purposes/requirements.

Further, we would like to submit that the outcome of the WRC-19 (scheduled to be held between 28<sup>th</sup> October 2019 to 22<sup>nd</sup> November 2019) be examined so that Indian Railways can get benefitted with globally harmonized spectrum bands for meeting their requirements of RSTT, if these are not served through existing spectrum allotments.

The Authority has noted in its consultation paper that the frequency ranges under consideration in ITU for a possible regional/global spectrum harmonization for RSTT cover 335.4 – 470 MHz and that studies in China were undertaken on the 450 MHz band, which may possibly become the globally harmonized band for RSTT during WRC-19.

**Q.4 In case it is decided that spectrum in IMT bands which have already been earmarked for mobile services, be assigned to Indian Railways for RSTT in India, what should be the methodology (including price) of allotment of spectrum?**

A4. We reiterate our submission that no spectrum in IMT bands which have already been earmarked/identified for IMT and which have been globally harmonised for mobile services, should be considered for RSTT in India. It is submitted that DoT, vide notification no. R-11014/15/2012-NT dated 1<sup>st</sup> October 2013, had stated that allotment/assignment of spectrum in non-IMT bands may be made administratively as an interim measure, pending the final decision of the Government on allotment of all spectrum only through auction process.

There is no such exception, as of now, for IMT bands where all aspects related to IMT bands pricing should be seen.

**Q.5 In case it is decided to assign spectrum in other spectrum bands (including 450-470 MHz band), what should be the methodology (including price) of allotment of spectrum?**

A5. We would like to submit that the outcome of the WRC-19 (scheduled to be held between 28<sup>th</sup> October 2019 to 22<sup>nd</sup> November 2019) be examined so that Indian Railways can get benefitted with globally harmonized spectrum bands for meeting their requirements of RSTT, if these are not served through existing spectrum allotments.

**Q.6 Do you foresee any challenges, if IR makes internet services available onboard i.e. within the train using spectrum allocated for signaling purpose?**

A6. We submit that any commercial use of spectrum can only be undertaken by a licensed telecom service provider and hence, we do not agree with the provision of internet services using the spectrum allocated for signalling/captive use. The right to provide service in trains should be open for all operators and it cannot be the case that service is given only by one operator.

On-board Wi-Fi/internet services in trains can be provided by any/all TSPs or ISP as per the license.

**Q.7 Whether the requirement of IR for RSTT can be fulfilled using the following alternate methods:**

**i) Alternate method suggested in para 4.47, wherein a TSP could build, deploy and maintain LTE-R network for IR; while the control, use and operation of the LTE-R network may be with IR. OR**

**ii) Alternate method suggested in para 4.48, wherein there could be a common integrated network (with common spectrum) for Public Safety i.e. Public Protection and Disaster Relief (PPDR) and Railways, using PS-LTE and LTE-R technology respectively. OR**

**iii) Any other method as may be suggested by the stakeholders. (Please provide detailed response with justifications and required enabling provisions.)**

A7. We reiterate our submission that no spectrum in IMT bands which have already been earmarked/identified for IMT and which have been globally harmonised for mobile services, should be considered for RSTT in India. Subject to this, in our view an approach similar to option 1 can be followed where different TSPs can associate with IR for different areas, which will result in more efficiency and innovation in setting up of RSTT.

**Q.8 If there are any other issues/suggestions relevant to the subject, stakeholders may submit the same with proper explanation and justification.**

A8. None

22<sup>nd</sup> July 2019  
New Delhi