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Comments on TRAI Consultation Paper No. 9/2011

“Allocation of Spectrum Resources for Residential and Enterprise Intra-telecommunication Requirements/Cordless Telecommunication Systems (CTS)”.

Company presentation

INNOVA (An ISO 9001:2008 Company) is the National Distributor, After Market Services & Technical Support Partner for Hands free Audio End Point Solutions.

Innova is the leading headset vendor in India with installed base across all technology platforms such as Analogue, Digital & IP within the Contact center & Unified Communications space. We are focused to co-develop, customize & integrate our Hands Free Audio End Point Solutions with Key Strategic Alliance Partners, to deliver the best in its category “End User Experience” for headset adopters.

We have matured over the last one decade to create a complete suite of service offerings that are enabled through a nationwide infrastructure network, team of dedicated professionals & an application suite to enable Productivity and Best Value Positioning for Jabra Hands Free Solutions.

Our Team is committed towards providing complete Hands-free Audio End Point Solutions through our presence in India in the following cities :

- Delhi, Noida, Mumbai, Pune, Hyderabad, Bangalore, Chennai, Kolkata, Ahmadabad & Indore

Please visit our website www.innovatelecom.com & www.headsetsindia.com

Innova through its relationship with the largest headset manufacturer has the capability to provide wireless solutions based on DECT technology. At present we cannot provide these critical solutions to Call Centers in India due to the current spectrum allocation.

Issues for Consultation

3.1 Whether the current allocation of spectrum for CTS is sufficient to meet the requirements? If not, then how to meet the demand of cordless telephony spectrum requirements?

Answer:

While the current allocated spectrum for CTS is sufficient for existing needs in the future the 1910-1920Mhz band must also be considered for digital CTS applications. Also please consider that the 1880-1900Mhz band which is most suitable for voice is a licensed band. This discourages users from using the current available digital CTS technologies.

3.2 In view of the availability of cellular mobile services in the country and possibility of Fixed Mobile Convergence (FMC), is there any need to have DECT technology?

Answer: Yes! Most Headset Manufacturers like Jabra provide hands-free communication solution for Call Centers and offices. These DECT enterprise solutions provide on-premises local mobility and full coverage.

3.3 Is there any requirement of allocating spectrum for digital CTS, in view of similar solutions being available in already de-licensed band 2.4 & 5.8 GHz?

Answer: For Call Centers and offices that needs to provide high quality voice applications the interference free characteristics of DECT is critical and mandatory. India needs a 1880-1900Mhz license exempt protected TDD spectrum to provide state of the art residential and enterprise critical voice services.

3.4 Whether de-licensing of the spectrum for digital CTS applications will be the right path?

Answer: Yes it is essential & in the best interest of public.

3.5 Do you agree that the 1880-1900 or 1910-1920 MHz band (TDDMode) be allocated for digital CTS applications? If yes, what should be the limits of emitted power (EIRP), power flux density (pfd), antenna gain etc?

Answer: No Comments

3.6 Do you see any coexistence issues between existing cellular systems using adjacent band with low power CTS allocations in 1880-1900 or 1910-1920 MHz band?

Answer: All over the world, including America and Europe, DECT systems are co-existing with cellular systems both in the 1880-1900Mhz and 1910-1920Mhz band.

3.7 Whether the de-licensing of either 1880-1900 MHz or 1910-1920MHz band for low power CTS applications will result in loss of revenue to the government?

Answer: No Comments

3.8 Will there be any potential security threat using CTS? If yes, how to address the same.

Answer: The digital CTS radio links normally use ciphering and authentication with the same security level as GSM/UMTS, thus providing secure private communication within the residential or enterprise space.

3.9 Amongst the various options of digital technologies available to meet the cordless telephony requirements, either spectrum allocation can be considered according to technology or the etiquettes/ specifications can be defined for the de-licensed spectrum band. What method of allocation of spectrum for digital CTS applications should be adopted?

Answer: No Comments