



MTNL/RA/TRAI C.P.-10/2016  
Dated 06.07.2016

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To,

The Advisor (NSL)  
TRAI, New Delhi

Sub. : Comments on TRAI Consultation Paper on "In-Building access by Telecom Service Providers".

TRAI issued Consultation paper on 06.06.2016 on the aforesaid subject and asked the various stakeholders to comment on the issues involved in the consultation paper. In this reference following comments from MTNL are submitted for consideration:

**Q1. Do you agree that there is a need to address the issues discussed in this consultation paper or the market is capable of taking care of these issues without having any policy intervention/guidelines in this regard?**

**MTNL Comment:** Telecommunication has now-a-days become a basic need of any human being like water, air, electricity etc. In a democratic country like India, it will be unjust to deprive off anybody to avail telecommunication services from his / her choice of service provider depending upon his / her requirements.

In our opinion, leaving the issue unaddressed and allowing the market forces to take care of the in-building access issues themselves will be more or less similar to supporting / favoring the monopolistic environment in one or other way.

Accordingly, considering the present circumstances wherein access to any building, commercial complex etc solely depends upon the wish & will of property owner, builder / developer and RWA etc, create an artificial monopolistic environment neglecting the choice of the residents in selection of service provider, **It is need of the time to formulate some regulatory framework to facilitate TSPs for gaining access to the desired premise without any prejudice, for offering quality telecommunication services.**

**Q2. How can sharing of telecom infrastructure inside a residential or commercial complex/airport/hotels/multiplexes etc among service providers be encouraged? Should the sharing of such telecom infrastructure be made mandatory?**

**MNTL Comment:** In order to provide open & unhindered access to all the TSPs inside a residential or commercial complex/airport/hotels/multiplexes etc., it is suggested that in co-ordination / co-operation with Ministry of Urban Development, Government of India, a code of practice may be formulated for creation of common telecommunication infrastructure (CTI) inside such establishments. Further, Completion certificate to new multistoried building may be linked with conformance to such CTI provisions.

In our opinion, only the infrastructure providers (IPs) may be allowed to create such common telecommunication infrastructure (CTI) inside the buildings with sufficient capacity. Further, sharing of such telecom infrastructure with the TSPs shall be made mandatory and can be allowed through suitable agreement.

**Q 3. In view of the international practices given in para 18-23 of Chapter-II of the Consultation Paper, what provisions should be included in the National Building Code of India to facilitate unhindered access for all the TSPs?**

**MTNL Comment:** Please refer our comment under Q2 above. Following provisions may be included in the National building code of India:

- (i) Only the infrastructure providers (IPs) may be allowed to create **common telecommunication infrastructure (CTI)** inside the buildings with sufficient capacity and all the TSPs should get access to / share such CTIs for providing telecom services inside the building. For this purpose, the authority may convey detailed specifications of space and other facilities required for creation of CTI facilities.
- (ii) **Completion certificate** for the newly constructed multistoried buildings to be issued only after confirming the above CTI provisions with sufficient capacity.
- (iii) **Suitable agreement** to be signed between Infrastructure provider / builder (as decided by the authority) & the TSP for the purpose, with common terms & conditions, utilization charges etc for all the TSPs.

Q 4. Any other option, which in your view, could resolve the issues discussed in this consultation paper?

MTNL Comment : No comments

14.07.16  
R.D. Singh  
17.07.16