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To: TDRA TRAI <tdra@traai.gov.in>

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Subject: Counter Comments on TRAI's paper on Telecom Infrastructure Policy

From : A M JOSHI, (ret.) Wireless Adviser to the Govt. of India , Pune [amjoshi7@gmail.com]

To; Shri Mr. Lav Gupta, Principal Advisor (TD)

Dear Shri Gupta ji,

The TRAI has brought out an excellent and comprehensive Consultation Paper on Telecom Infrastrucutre Policy Issues. It is hoped that the TRAI Recommendations following the same will help the Govt. to rework its policies and guidelines to provide a fresh trigger for further acceleration of Telecom Sector's growth in India.

It is however, regretted that the questions reg. revision of norms / guidelines adopted by the DOT reg. EMF Radiation Health Hazards to public at large [from Cell Phone Tower Radiations close to residential buildings and extensive use of cellphones] and related issues have not been addressed by the TRAI Paper . This aspect has attracted attention globally , in recent years and in India , in particular giving rise to apprehensions in the minds of general public reg. health hazards resulting in cancer, brain tumours and other ailments .

Recently DoT released REPORT OF THE INTER-MINISTERIAL COMMITTEE ON EMF RADIATION which has recommended that the RF exposure limits in India [based on ICNIRP Guidelines] may be lowered to 1/10th of the existing level without explaining or justifying why they recommend 1/10th. Though this is a welcome first step in this direction , this issue needs Regulator's comprehensive consideration and attention . Many other countries have adopted still lower levels . The ICNIRP limits are based on 6 minutes exposure , while from Tower Radiation , the public is bombarded round the clock continuously. This aspect also needs to be examined.

In addition, the implementation mechanism for on site measurements for verification of any such limits has to be simple, quick and easily accessible to satisfy general public. This also needs to evolved in view large no. of Towers [running into a few lakhs] in the country .

You have also recommended in-building solutions. Some persons will be continuously exposed to radiation from in-building antennas for several hours per day because their working areas are in their main lobe. What will be the effect on their health on short term and long term basis?

This question has not been raised anybody.

Hope that the TRAI will take up these issues also for serious consideration.

With Best Wishes,

A.M.JOSHI