

**From**  
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**Date: 21<sup>st</sup> Feb11**

**To**  
**Shri. Lav Gupta**  
**Principal Advisor (TDRA)**  
**Telecom Regulatory Authority of India**  
Mahanagar Door Sanchar Bhawan (Next to Zakir Hussain College)  
Jawahar Lal Nehru Marg (Old Minto Road), New Delhi-110002

**SUB:** Comments/Counter Comments – Reg.

**REF:** Issues related to Telecom Infrastructure Policy, dated 14<sup>th</sup> Jan 2011

No stakeholder mentioned above the following, hence the following comments/counter comments are here by submitting:

- 1) **Primary Reference Clock (PRC):** India should have single National Primary Reference Clock (NPRC) to safe guard its own ICT applications & N/W. This is to be included as active Telecom infrastructure with appropriate regulation.
- 2) **In view of the following:**
  - a. If a single tower is shared by more than one operator, the radiation effects increase in multi folds - as per Shri. Prof. Girish Kumar's remarks

**It is suggested:**

- (i) No. of operators sharing a tower is to be limited basing on the human habitat surrounding that tower.
  - (ii) The distance of the antenna/s (the source of radiation) from the nearest human habitat is to be defined to avoid future health hazards to them.
- 3) Keeping in view of **future generated E-Waste** due to frequent out-dated equipments, the following **new Telecom business model** is to be formulated as new telecom policy in India:
    - a. In place of MNO or VMNO, it is better to introduce **“Physical Operators”** & **“Service Operators”**, where both will work on revenue basis. Here the physical operators will manage all physical infrastructures (active & passive) & service operators will deliver services & manage customers. This method will eliminate the multiple infrastructures and thus minimizes the future environmental hazards.
      - i. Multiple infrastructures means **consuming multi fold natural resources.**
      - ii. Multiple active infrastructures means, **maximizing future e-waste & spoiling our environment.**
    - b. For having sustainable National development, creation of Indigenous Telecom business Models are essential.

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