

Dear Sir,

With reference to views to be shared on consultation paper on above subject, I am submitting my views on behalf of ISP Speed online.,net Pvt.,Ltd., located at Rajkot (Gujarat).

Q1: What should be the approach for incentivizing the proliferation of fixed-line broadband networks? Should it be indirect incentives in the form of exemption of license fee on revenues earned from fixed line broadband services, or direct incentives based on an indisputable metric

Speed Online Response : To approach for incentivizing the proliferation of fixed-line broadband networks not possible to describe in one or two note. There are so many factor /challenges we faced to expand fix wire topology.

1. ROW: Due to high fees structure by local Municipal corporation body its not possible to lay underground fibre for MSME and SME service provider. In addition every Local Municipal Corporation not only charge onetime huge cost but also raise demand note under rental head @ 10% of recurring charge for every year.

2. High CAPEX and recurring maintenance cost of fixed-line infrastructure.

3. Apart from local govt. bodies we have to face local Housing Societies who asked for rental for taking wires in and out of the Society premises and fixation of distribution point. Now a day's almost all society owner enter into agreement with singular service provider and give exclusive right to provide service in their society member, in this case another service provider are not allow to provide the service and such practice lead monopolize era.

4. Therefore we urge TRAI to address this issue through consultation on overhead wires also which is to be laid on electric company pole with minimum recurring token fees. Due to no such type of regulation framed by DOT / TRAI .

Sir ,

To provide fix wire service we have to carry fix wire by underground trenching and overhead areal router. We need certain regulation which help us to grow our fix wire infrastructure.

There are multiple type of hurdles/challenges to roll out fix wire infrastructure in addition we have to allocate our major cash flow to maintenance cost account. Hence we recommend indirect incentives by waiver of LF on AGR particular on FIX WIRE segment.

Q2. If indirect incentives in the form of exemption of license fee on revenues earned from fixed-line broadband services are to be considered then should this license fee exemption be limited to broadband revenue alone or it should be on complete revenue earned from services delivered through fixed-line networks?

Speed Online Response -

We recommend indirect incentives in the form of exemption of license fee should be categorized on turnover base exemption and it should be extended to Landline Voice along with data as now a days voice on the fixed line is compulsion and generally TELCO are providing absolutely free on bundle package Data of internet service.

SR.	Category	Slab after pass out credit
1	MSME (UP to 8 Cr AGR)	0% License Fee
2	SME (8 CR to 50 Cr AGR)	2% License Fee
3	Above 50 Cr AGR	6% License Fee

Such turnover base breakup to categorize LF segment on turnover base will boost MSME segment and our government is encouraging start up and MSME growth.

Q3. In case of converged wireless and fixed-line products or converged services delivered using the fixed-line networks, how to unambiguously arrive at the revenue on which license fee exemption could be claimed by the licensees?

Speed Online Response - With the evolution of technology, the core networks for Mobile Broadband and fixed-line broadband services have become common. Further, it is a fact that most of the online services and applications can be accessed by subscribers through both mobile and fixed broadband.

We suggest that the any wireless broadband service which is not capable of mobility should be treated as equivalent to fixed-line broadband service and should be exempted from the imposition of license fee.

Q4. What should be the time period for license fee exemption? Whether this exemption may be gradually reduced or tapered off with each passing year?

Speed Online Response : It should be for a minimum period of Five Years in Urban and 10 years in Rural Areas with scope for review by the Govt after the time period or till fixed line broadband penetration reaches 50% of homes compared to current 8.9% .

Q 5. Is there a likelihood of misuse by the licensees through misappropriation of revenues due to the proposed exemption of the License Fee on the revenues earned from fixed-line broadband services? If yes, then how to prevent such misuse? From the revenue assurance perspective, what could be the other areas of concern?

Speed Online Response : We believe there are several types of audit being conducted by TERM cell, CCA and TRAI, a good mechanism can be worked out for such isolated cases and perceived threat of revenue misappropriation can be stopped.

Also in case of any misuse by the licensee established through misappropriation of revenues due to the proposed exemption of the license fee on the revenue earned from fixed-line broadband services, it is suggested that appropriate penalty may be imposed on such defaulter licensee.

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Q 6. How the system to ascertain revenue from fixed-line broadband services needs to be designed to ensure proper verification of operator's revenue from this stream and secure an effective check on the assessment, collection, and proper allocation and accounting of revenue. Further, what measures are required to be put in place to ensure that revenue earned from the other services is not mixed up with revenues earned from fixed-line broadband services in order to claim higher amount of incentive/exemption.

Speed Online Response :

We suggest following measures to ensure proper verification of service provider's revenue from the fixed-line broadband/internet access stream and accounting of revenue for the purpose of license fee:

- Those licensees having only ISP licenses/ authorizations i.e. standalone ISPs, are providing broadband/internet access services alone, therefore there would not be any issues in terms of verification of revenue pertaining to fixed-line broadband/internet access services. Whereas those licensees having both Access Service and ISP licenses/ authorizations i.e. integrated service providers bundling the voice and broadband/internet access services, it is suggested that the license fee should be imposed on the entire revenue earned from bundled services as TRAI has rightly mentioned in the paper that it may not be feasible to calculate the revenues earned from voice and broadband/internet access services separately.

A lot of service providers have to compete against players like Airtel and have to buy telephony services under VNO licenses to compete. They have to absorb these costs. To further expect the ISP to pay the AGR on the whole amount will kill ISPs players. Some players may not be facing such issues because Airtel, JIO etc are not in there areas currently. But they certainly will be.

Furthermore, voice to be bundled as a service, bought by an ISP already included AGR paid by the upstream TELCO. He just needs to pay the difference on differential sales price if any.

- In those cases, where licensee (integrated Service Provider) offering fixed line service by bundling with the content and other value-added services like IPTV, video streaming, video conferencing, music, security services, etc. It is suggested that the exemption of the license fee should not be given.

In the end of the day broadband services are there only so that people can play IPTV, OTT and other applications. We cannot even imagine what future innovations will bring on the table. To include broadband and such services in the AGR would be not appropriate, especially when the standalone players providing similar services like cable operators , DTH etc do not pay AGR. What is the use of a broadband service which cannot give Value added Services because they will get outpaced in the market due to AGR applicable on them.

- In case of access of broadband services by subscribers through wireless as well as fixed-line broadband connectivity wherein consumer subscribes to both types of broadband i.e. wireless and fixed-line broadband services from a integrated service provider as a bundled products consisting of wireless and fixed-line services for the complete family, in that case license fee should be imposed on the entire revenue earned from bundled services.

No comments as of now. But others may add.

- Further as suggested above, any wireless broadband service which is not capable of mobility should be treated as equivalent to fixed-line broadband service and should be exempted from the imposition of license fee.

NO problem with this

Therefore the answer needs to be much more nuanced as there is no simple answer to this

Q 7. Is there any indisputable metric possible to provide direct incentive for proliferation of fixed-line broadband networks? What would be that indisputable metric? How to ensure that such direct incentives will not be misused by the licensees?

Speed Online Response :

To focus on addressing the supply side constraints and incentivize the creation of new infrastructure, by providing direct incentives to the fixed line service providers for creation of new infrastructure. This may also address the risks relating to disturbance of the level playing field and misappropriation of revenues. An indisputable metric could be the number of FTTH Connections or the Fiber Laid month-on-month.

Q8. What are key issues and challenges in getting access to public places and street furniture for installation of small cells? Kindly provide the State/ City wise details.

Speed Online Response :

Some of the Issues and Challenges associated with deployment of small cells and use of street furniture are given below:

- The most important issue hampering proliferation of small cells is the Right of Way (RoW) as the RoW permissions are granted by individual central, state, local government bodies.
- A single window clearance for RoW both for underground as well as overhead cabling with clear terms should be implemented. As proposed earlier NFO/SFO/DFO must be setup to speed up the RoW permission.
- Having one would help in simplification and expediting RoW approvals. Most metro cities have sky-rocketing RoW and reinstatement charges that prohibit laying and developing a fibre network. These charges aren't standard and can vary even within city limits for certain cities.
- To make street furniture suitable for small-cell networks, it must be able to accommodate power, antenna, and associated cabling equipment. Small cell deployment requires approval for site acquisition, negotiation of fees with municipal corporations or other government bodies and availability of suitable backhaul and power at site. In this regard, there are no specific provisions for seeking permissions and applicable charges for deployment of small cells using street furniture at public places in majority of the Tower Infrastructure policies of various States and Union Territories
- Getting access to street furniture is also not be available with any one central agency. These vary from State to State or City to City. Putting in place a uniform, simple, and efficient process for granting access to street furniture for installing small cells is need of the hour.
- Granting access to public places like government buildings/railway stations/metro rail stations/ airports/ stadiums etc. and street furniture, such as bus stop shelters, utility poles, lamp posts or traffic lights, owned by municipalities, at reasonable cost could remove a significant hurdle in 5G site deployment.

Q9. How to permit use of public places and street furniture for the effective rollout of 5G networks? Kindly suggest a uniform, simple, and efficient process which can be used by States/ Local-Bodies for granting access to public places and street furniture for installing small cells. Kindly justify your comments.

Speed Online Response :

In first place, there should be common policy for all central government bodies, state government bodies and local authorities. And one central co-coordinator at each district level with direct supervision of DoT need to be created with precise timeline to grant permission for RoW.

Simplified rules are required in place of present practice of multiple approvals to allow access to the existing street furniture and other sites for speedy roll out of small cell sites and related equipment at public places. There should be nil/ minimal charges uniformly applicable across all public places within the State/ Union Territories. Further, there should be a specific statutes or laws that provide protection of small cell assets deployed on street furniture.

Q10. Which all type of channels of communication should be standardized to establish uniform, transparent, and customer friendly mechanisms for publicizing provisioning of service and registration of demand by Licensees?

Speed Online Response :

To establish uniform, transparent, and customer friendly mechanisms for publicizing provisioning of service and registration of demand by Licensees a common portal can be created to register the demand , and same can be shared with all service providers operating in that particular service area, by providing login to each service provider. This portal can widely be published in all media for consumer awareness.

Such transparency can lead to better demand assessment and future network planning in non-feasible areas.

Q11. Whether proliferation of fixed-line broadband services can be better promoted by providing Direct Benefit Transfer (DBT) to subscribers of fixed-line broadband services? If no, elucidate the reasons.

Speed Online Response :

As this option is not yet practiced, in our country, it is difficult to comment. However we recommend Government should incentivize fixed-line broadband service providers by way of exemption of license fee, withdrawal of retrospective demands on license fee on unlicensed revenues, reimbursement of the capex and opex of network deployed in rural and urban areas from USO fund for offering services in subsidized tariffs etc.

Q12. If answer to Q11 is affirmative, then:

- i. **Should DBT scheme be made applicable to all or a particular segment of fixed-line broadband subscribers? Kindly justify your comments.**
- ii. **If you recommend supporting a particular segment of fixed-line broadband subscribers, how to identify such segment of the subscribers?**
- iii. **How to administer this scheme?**
- iv. **What should be the amount of DBT for each connection?**
- v. **What should be the period of offer within which individuals need to register their demand with the service providers?**
- vi. **What should be the maximum duration of subsidy for each eligible fixed-line broadband connection?**

Speed Online Response :

We recommend indirect incentives approach to be taken by exempting license fee for a minimum period of five years or till the period of review of license fee by the Government. Withdrawal of demands for license fee on unlicensed businesses can help in unleashing the potential of ISPs to expand the networks.

Q13. Any other related issue.

Speed Online Response :

Other incentives like rationalizing NLD rates (pending since very long) , creating local data centres, allowing sharing of active infrastructure sharing can also work for increasing penetration. Effective utilization of infrastructure of PSUs, NOFN, with right pricing can help gathering momentum. For all Bharat Broadband OFC and PSUs OFC, leasing prices should be determined on the basis of capacity built, and not capacity utilized. Utilization of office space available for data-centres, effective proliferation of internet exchanges can also help achieving desired results.

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With Best Regards
Pravin Trivedi
Cell :- 9825070940
Speed Online .Net Pvt. Ltd.
Rajkot