

Date: 20.07.2010

To:

Telecom Regulatory Authority of India,
Mahanagar Doorasanchar Bhavan,
Jawahar Lal Neru Marg, (Old Minto Road),
New Delhi-110 002

Dear Sir,

Subject: Consultation Paper on National Broadband Plan dated 10th June 2010.

At the outset we thank you for the opportunity given to us to express our view points and comments on the National Broadband Plan. We enclose herewith our comments on the consultation Paper issued on National Broadband Plan dated 10.06.2010 inviting our comments on the same. Our chapter wise comments on the summary of issues of consultation in the same manner as per the consultation paper issued by the Hon'ble Regulator are as follows:-

CHAPTER 5: Summary of Issues for Consultation

CHAPTER 2: Broadband – Demand & Supply

5.1 What should be done to increase broadband demand? (Reference Para 2.23)

1. Educating the consumer on all-encompassing benefits of BB including the areas of interactive education , infotainment, on demand infotainment and overall economic development – this should be done thru a communication drive by the Nodal agency
2. Making the broadband affordable by facilitating right of way, enabling unrestricted availability of proprietary content such as broad cast channels, educational content and public accountability programs including RTI information
3. By making broadband based platforms such as IPTV as the key focal platforms at the centre of home

5.2 What, according to you, will improve the perceived utility of broadband among the masses? (Reference Para 2.23)

Empowering the end subscriber including the population in less economic strata thru affordable Broadband connectivity and CPE.

5.3 What measures should be taken to enhance the availability of useful applications for broadband? (Reference Para 2.23)

A strategic thrust to make triple play of Video , Voice and Data availability in every Indian home at marginal cost. Providing thrust to inter-operable middleware and content platforms.

Opening up VOIP and Video Calling. Provide number series for VOIP termination with PSTN. Promote more data centres and localize them. Ensuring large connectivity with NIXI

5.4 How can broadband be made more consumer friendly especially to those having limited knowledge of English and computer? (Reference Para 2.23)

The best platform to make this happen is utilise the existing equipment such as Television and mobile phones and provide broadband based value adds thru IPTV . This takes of impediments of investments in computers and provides thrust to English agnostic reach.

5.5 Do you agree with projected broadband growth pattern and futuristic bandwidth requirements? (Reference Para 2.35)

While these projections are ambitious, the platform being a growth multiplier, Govt and industry should help achieve these projections.

5.6 Do you agree that existing telecom infrastructure is inadequate to support broadband demand? If so what actions has to be taken to create an infrastructure capable to support futuristic broadband? (Reference Para 2.35)

Existing infra is insufficient as already captured in the report. There is a requirement to build Shared Infra for Core (Nationwide) and Access (Citywide) Network. Government should promote this by taking Broadband into the “Essential Infrastructure” category and giving it necessary SOP’s and exemptions in order to promote the roll out of the Nationwide networks

Govt should roll out a synthesised Right of Way with last mile access to all the ISPs , which will not only facilitate broadband reach but also enhances the competition thus making the end user cost most affordable

CHAPTER 3: National Broadband Network

5.7 What network topology do you perceive to support high speed broadband using evolving wireless technologies? (Reference Para 3.22)

Wimax and LTE

5.8 What actions are required to ensure optimal utilization of existing copper network used to provide wireline telephone connections? (Reference Para 3.22)

Unbundle the Local Loops and encourage sharing of POP's, for all operators

5.9 Do you see prominent role for fibre based technologies in access network in providing high speed broadband in next 5 years? What should be done to encourage such optical fibre to facilitate high speed broadband penetration? (Reference Para 3.22)

Yes. To encourage fiber optic rollout, allow the build up of shared capacity. Ensure that the company which is responsible for building up this capacity is not a Telecom Service Provider, as their role must only be to build and sell capacity. This needs to be done at a National and City wide basis, both for core and for Access networks

5.10 What changes do you perceive in existing licensing and regulatory framework to encourage Cable TV operators to upgrade their networks to provide broadband? (Reference Para 3.22)

Its important to recognise the Cable networks as infrastructure industry. Given that vast majority of the cable operators are self employed, its important to extend financial credit to the cable industry.

