



Association of Unified Telecom Service Providers of India

AUSPI/12/2010/77

30th April , 2010

Dr. J S Sarma,
Chairman,
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg,
(Old Minto Road),
New Delhi 110 002

Sub: AUSPI's comments on 'Allocation of Spectrum for Technologies such as DECT to meet the Residential and Enterprise Intra-Telecommunication Requirements'

Dear Sir,

TRAI has sought some comments on a proposal placed on its website on 19th February 2010 regarding allocation of spectrum for technologies such as DECT, to meet the Residential and Enterprise Intra-Telecommunication Requirements. The comments are required on a proposal of a specific technology, Digital Enhanced Cordless Telecommunications (DECT).

2) The unified access service licenses issued to our member service providers are based on the principle of technology neutrality. The Authority also has categorically stated in its Recommendations of 27th September 2006 on Allocation and pricing of spectrum for 3G and broadband wireless access that **TRAI being a technology neutral regulator, do not want to project specific technology biases and this is a macro level approach for spectrum management.** We feel that there is no rationale for supporting a cause of a particular technology by the regulator which vehemently supports technology neutrality approach and therefore, on this ground itself the proposal prima facie lacks any merit for consideration.

3) **Some of our views regarding the TRAI proposal are as follows:**

- a) Band plans mentioned in the National Frequency Allocation Plan 2008 (NFAP 2008) viz IND 53 and 54 are **licensed band specifying certain usage** in the band 1880-1900 MHz and 1900-1910 MHz paired with 1980-1990 MHz.
- b) Frequency band 1900-1910 paired with 1980-1990 MHz is for CDMA network for their growth path for which successful field trials have been conducted under the aegis of WPC so that this band can be utilized along with 3G band as per IND 55. Precious spectrum band 1880-1900 MHz, which is presently being earmarked for certain indigenous technology like CorDECT need also be considered for better utilization in TDD mode by the telecom service providers. **Considering the above use of the spectrum, requirement of 20 MHz in the proposal is not feasible.**
- c) **Delicensing the band is not a solution because it will create interference and huge revenue loss to the Government exchequer** in the form of no revenue share, license fee etc from the service providers. The contention of receiving spectrum related revenue as suggested in the proposal from the manufacturer / importers is neither tenable nor workable as the licensee has to pay and not the vendor.
- d) Mobile service providers are extending their coverage to the underserved rural areas at an affordable rate with world class quality of service and in view of that there is no necessity of DECT for rural area coverage. World over, DECT is used for urban enterprise market only and we are sure it will be utilized as such in India also.
- e) License free spectrum in the desired band in the proposal will create interference in the contiguous band which is being used by the Service Provider for cellular service.
- f) Though, ITU Recommends IMT-2000 systems to be deployed in any of the bands identified by the ITU for IMT 2000 in Radio Regulation. The ITU-R Recommendation M-1036 also states that the administrator is free to choose the band for IMT-2000 in own country.


g) Spectrum in 1.9 GHz for DECT, as per the proposal, will also be dysfunctional because of higher gain antennas deployed for Mobile and WLL services in this band which will cause interference to DECT service.

h) We are of the view that the way mobile phone density has increased in our country; there is no need for DECT phone. A subscriber would not like to carry two phones.

4) In view of the above, we earnestly request the Authority that the proposal regarding allocation of spectrum for technologies such as DECT to meet the residential and enterprise intra-telecommunication requirements is not feasible and **should be summarily rejected as it may also cause interference of various bands and reduce government revenue from the licensed bands.**

Thanking you,

Yours faithfully,


S.C.KHANNA
SECRETARY GENERAL

Copy to:

1. Shri R. Ashok, Member, TRAI
2. Prof. H S Jamadgni, Member, TRAI
3. Shri R.K.Arnold, Secretary, TRAI
4. Shri Sudhir Gupta, Advisor (MN), TRAI