TSDM
Telecome System Design & Manufacturers Association

21st September, 2015

Shri R. S. Sharma
Chairman
Telecom Regulatory Authority of India
New Delhi

Sub : **TRAI Consultation Paper on Compensation to the Consumers in the Event of Dropped Calls – Consultation Paper No. 4 / 2015**

Dear Sir,

This has reference to the recent consultation paper released by TRAI seeking stakeholders inputs on various issues raised in the consultation paper on *'Compensation to the Consumers in the event of Dropped Calls'*

Telecom System Design & Manufacturers Association (TSDM) is an industry association founded by leading domestic telecom system manufacturing and R&D organizations that have indigenous design and development, IPR creation and manufacturing capabilities in the country.

In this regard, we would like to respond as under:

Q4: Is there any other relevant issue which should be considered in the present consultation on the issue of call drops?

Submission:

We welcome the TRAI consultation process to discuss the compensation mechanism in the event of call drops at a time when the government has been grappling with the issue of frequent call drops following the massive deterioration of mobile services.

As per one of the recent news items, we understand that the Hon'ble Prime Minister has directed officials to explore the possibility of leveraging existing resources, including railways and other communication infrastructure.

In this context we would like to submit that while the country has witnessed exponential growth in the mobile subscriber base, it has been established by various studies with regard to the pattern of usage of these services that more than 75% calls are originated and received by the subscribers while they are inside the buildings.

The traditional mobile infrastructure deployment being used by mobile operators in the country is not an optimal and efficient way of using scarcely available frequency spectrum in the network.

By deploying In-Building Solutions (IBS) with dedicated frequency spectrum can reduce the overall frequency spectrum requirement for the outside micro network.

In this backdrop, we would like to bring to your notice that NFAP 2011 identifies the provisions to assign frequencies in GSM frequency bands for operation of Micro cellular low powered telecommunication systems using indigenously developed systems and technologies under IND foot notes 50 & 55.

TELECOM SYSTEM DESIGN & MANUFACTURERS ASSOCIATION
A-11, (Ground Floor), Pamposh Enclave, Greater Kailash - I, New Delhi 110 048, India,
Tel. : +91-11- 41042327
Email : admn@tsdm.in,Website :www.tsdm.in

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"IND 50" *Requirements for Micro cellular low powered, telecommunication systems with maximum EIRP up to 4 Watts, FDD access techniques may be considered at specific locations for indigenously developed systems and technology, in a small chunk, in the frequency band 900 MHz presently used by existing wireless users of captive systems subject to co-ordination on case-by-case basis".*

"IND 55" *Requirements for Micro cellular low powered telecommunication systems with maximum EIRP up to 4 Watts, FDD access techniques may be considered at specific locations for indigenously developed systems and technology, in a small chunk, in the frequency band 1800 MHz presently used by existing wireless users of captive systems subject to co-ordination on case-by-case basis"*

Further, NTP 2012 has also envisaged one of the strategies as under:

"4.7" *To consider requirement of spectrum in certain frequency bands in small chunks at specified locations for encouraging indigenous development of technologies/ products and their deployment"*

In this regard, it is submitted that authority must identify a small chunk of frequencies in GSM frequency bands, in co-ordination with the existing wireless users of captive systems (Railways etc), where 2 – 3 MHz spectrum can be made available for micro cellular low powered telecommunication systems operations, without causing interference to the existing external network operations.

These frequencies can be assigned to extend services like "In-building Solutions" and captive applications for in building, campuses and townships etc. Setting up of private GSM networks in enterprises and private campuses as stand-alone networks like the Office PBX could be one such application. These will act as "Fixed Mobile Convergence" platforms for offices, Hotels, Hospitals and institutions for meeting their mobile communication needs. This dedicated low power spectrum for in building applications will help to decongest the telecom networks by deployment of new applications by reducing the spectrum load for outdoor macro networks and help operator address the call drop issues.

It is our earnest submission that while making its final recommendations, **TRAI shall consider recommending implementation of provisions contained under IND-50 and IND-55 of NFAP 2011** for use of scarcely available GSM spectrum in an efficient manner.

Thanking you,

Yours Sincerely
For **Telecom System Design & Manufacturers Association**

Authorized Signatory

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