



# Society for Incredible & Integrated Development

(The Making of Integrated Development - A Way for Incredible Life of Society)

112, First Floor, Navyug Market, Ghaziabad - 201 001 (U.P.)

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**Ravindra Narayan Pahalwan**

**Roop Chand**

**Shiwa Shanker Singh**

**Vivekanand Yadav**

पत्रांक : 2015-12-015

दिनांक : 06-12-2015

To,

Telecom Regulatory Authority of India

Mahanagar Door Sanchar Bhawan,

Jawahar Lal Nehru Marg, Next to Dr. Zakir Hussain College,

New Delhi - 110002

Reference : Your Consultation Paper no. 5 / 2015 dated 17-11-2015 On Implementation Model For BharatNet

Kind Attn: Shri Arvind Kumar, Advisor (NSL)

Sir,

We are pleased to introduced ourselves as a Society of Intellectual person working for the benefits of the society in large as well as our Nation.

Our experts have gone through your Consultation Paper No. 5/2015 On Implementation Model For BharatNet. Before presenting our point-to-point comments on above said Consultation Papers we will like to dray your kind attentions upon the following basic issues Our observations on this projects are as under :

1. That in this respect a GP pilot project was executed with the object to understand the issues / problems to be faced in future in the course of execution of main / final project. But unfortunately the outcome / observations diagnosed / explored through 'GP Pilot Project', are not being considered in the execution of main / final Project. And Main / Final Project is being executed without taking into consideration the results / feedback e.g. 'No operator came forward to use the services as network availability figures were not committed'.
2. That the work allotted / assigned to CPSUs (BSNL, RAILTEL and PGCIL) without assessment of their capability / capacity of 'execution of Project in time'. Unfortunately these CPSUs (BSNL, RAILTEL and PGCIL) are still continuing without any responsibility fixation as well as continuous failure of social obligation.

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3. That there is no 'Performance Monitoring Parameter / systems by TRAI' for back-haul of data from tower to the main exchange resulting into call-drop / conjunction mostly. Fibre is not being used for 'High Data Rate Capacity' and 'Microwave (MW)' of low capacity is being used.

Our submission is that USO funds available to the Government for the purpose of 'Socio Economic Development' of the Society particularly where 'Optical Fibre' is not laid down so far which to be declared as 'National Fibre Infrastructure'. Upon this 'Fibre Network' equipment and content be ride / travel and all e-Services be provided smoothly by the Government. The balance fibre capacity can be leased-out to other authorised users to provide the desired quality of service for ICT. No other 'Authorised user' should be permitted to lay down parallel fibre network, once this fibre network laid down. Rates can be fixed by TRAI similar to band-width rates to ensure reasonability of tariff and also the availability parameters (quality of service) for performance control.

Telecom infrastructure and services involve three different kinds of investments (extract from Global Reports) :

1. Long-term passive infrastructure, as sites, ducts, masts, poles and cables; and
2. Mid-term active equipment involving access, transport and control platforms; and
3. Application and content-related investments as cloud, CDN and SDP platforms.

That point-to-point submission of our experts are as under :

Q-1 The "Report of the Committee on NOFN" has recommended three models and risks/advantages associated with these models. In your opinion what are the other challenges with these models?

Upon the above said issue our submission is as under :

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The world wide success cases have mostly divided the network in three parts — (1) fibre infra, (2) technology; and (3) content.

In the above said report it have not been considered the collaboration method of existing fibre in the country as available resources (unbundling method). Also world wide countries have used existing copper for broadband. Copper unbundling has not been considered.

Social and commercial requirement has not been worked out separately.

No regulatory change has been proposed while world wide countries made regulatory reforms.

Different methodologies have been proposed for different states for implementation.

The sample data used is too small for generalising the decisions. Our Country is diverse and recommendations are generalised based on small / vague information. How the network integration will take place, is not covered in the above said report.

High level technology is proposed at GP level and skill-set is not considered.

The regulatory reform like declaring fibre network as infrastructure, making building norms as MEPO (Mechanical, Electrical, Plumbing and **add Optical**), setting fibre, duct lease rates to utilise existing resources etc are mandatory to make the vision a success at reasonable tariff with reasonable QoS.

Q-2 Do you think that these three models along with implementation strategy as indicated in the report would be able to deliver the project within the costs and time-line as envisaged in the report? If not, please elucidate.

Upon the above said issue our submission is as under :

No, Sir.

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The 3 models in report are State Led, CPSU Led and Private Sector Led. Before discussing the expected reasons why these models will not be able to meet the cost and time targets, we need to discuss some success stories globally. Going through the present status CPSU model was implemented and all know the status — the report clearly mentions that they have failed. State LED model needs analysis of pros and cons. Private Led model also needs analysis — why private players have not come forward so far. In this regard we may have to refer here USO funded tenders for block to district fibre based network was to created in Assam and NE. The bids were invited and no private player quoted, even though they attended all probed meetings. The projects were awarded to BSNL and RAILTEL, and they are still not completed. That means there is something wrong in designing USO funded projects because of which private players are not attracted to quote. CPSUs perhaps did not do the detailed analysis and quoted to win. They won and they are not able to deliver. The failure analysis needs to be done in detail (asking 5 times WHY at least to find root cause and then take decision) before arriving on these models. The state led models — states will need all types of licenses. They are not in this business. How will they make the project viable? Will they be able to sale bandwidth on competitive rates and with defined quality of service? There will be inter-connect issues. The national integration will be an issue for seamless working. No single operator who took license of single circle could survive as business case will not be there. Recently AP has come out with proposal on Aerial. The life of Aerial network is question mark. Also quality of service on Aerial will be an issue. Therefore, strength of all — State, CPSU, Private players are to be synergised before taking the decision and rather than assigning state by state, the responsibility by responsibility assignment can be done.

Points for State SPV:

1. They should only be IP1 registered Infrastructure Provider. They will own the fibre. Since the funding is from USO, they will first lay where there is no fibre. Once they lay, all have

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to use these fibres by leasing from them and will not be allowed to lay i.e., RoW will not be given. Example: Mumbai Pune highway, all have to take duct from Maharashtra Govt. In Nagpur city similar case. I can explain. This way national asset will not be duplicated as has happened so far. Multiple cables are there on same route.

2. By TRAI quality policy, the operators will be forced to take fibres. The rate can be fixed low as basic objective is to create infrastructure as social obligation.
3. To have defined plan, quality execution and defined QoS in O&M, all state SPVs will have standard process as per BBNL. Just think of franchise system of Subway — you will find same standard. For that BBNL will have presence at high level in State SPV and PMC and OMC teams (small) and state SPVs will have detailed PMC and OMC teams as per BBNL guidelines.
4. If state SPV becomes ISP, NLD or any other operator then it will be too complex. How will you integrate NOC? How will they cross state boundaries? Why do you want them to become operator? Let BBNL take ownership of Bharatnet. The services on Fibre provided by state SPV will be organised by BBNL i.e., technology and equipment. The content will be by others on franchise system/revenue sharing system.
5. If you make state SPVs please do SWOT analysis — what value will they add and how will they operate. The operators who were having just one circle license only have disappeared in this country itself as they could not survive.
6. The points can be further deliberated.

Q-3 Do you think that alternate implementation strategy of BOOT model as discussed in the paper will be more suitable (in terms of cost, execution and quality of construction) for completing the project in time? If yes, please justify.

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**Vivekanand Yadav**

Upon the above said issue our submission is as under :

Please see comments and inputs in reply of Q1 & Q2.

Before discussing BOOT, we need to have detailed network design by APEX body. Transfer in case of road etc is possible. In case of fibre, there is no precedence in the world perhaps. It can be BOO on reverse auction basis for Fibre Infra part (Passive under IP1). Once the USO fund is used for viability gap in reverse auction, then no other laying should be allowed as i-way is created for use of all. The rates can be fixed by TRAI for leasing. ROW should be free in terms of document. The social service requirement of fibres should be defined. Geo penetration should be the target for i-way. Existing fibres should be taken into account by going for EOI/reverse bidding basis. The existing owners can bid for providing fibres. The number of fibres can be decided similar to road network — Express way, NH, SH, Others etc as i-way is analogous to road network.

The electronics part should be open to all based on the requirement. For social service BBNL should create the network with States and extra capacity can be used for commercial use in competitive environment.

There are two models possible in fibre sharing — lease or revenue share.

The content part should be developed as separate building block to be collaborated by service providers.

Q.4 What are the advantages and challenges associated with the BOOT model?

Upon the above said issue our submission is as under :

BOOT has no precedence in fibre network. The points are covered in Q3 reply.

Q.5 What should be the eligibility criteria for the executing agency so that conflict of interest can be avoided?

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Upon the above said issue our submission is as under :

The eligibility criteria is to be designed for 3 building blocks — fibre infra, electronics and content. The main item is fibre infra. For that IP1 registration is required. To have local interest and involvement of locals, the financial strength, local employment and previous experience in OFC works as contractor for execution and O&M should be taken into account. Since the contractors do not have financial strength for such massive works, consortiums/JVs should be allowed. To ensure Quality of work (as public funds/USOF) are involved, BBNL should have Project Management Agency (PMA) to certify. Since this is long term association, the viability should be worked out on State level for smaller states and group of districts for larger states by fixing some figure of total KMs of network, say 20000 Kms or so. Man/machine/money resources are to be part of eligibility criteria.

Q.6 Should there be a cap on number of States/ licensed service area to be bid by the executing agency?

Upon the above said issue our submission is as under :

Yes, Sir.

To avoid monopolistic approach by bidders, number should be restricted to 2 to 3. The consortium should be with contractors who have work experience in that geography.

Q.7 What measures are required to be taken to avoid monopolistic behaviour of executing agency?

Upon the above said issue our submission is as under :

This issue is Covered in Answer of Q6.

Q.8 What terms and conditions should be imposed on the executing agency so that it provides bandwidth/fibre in fair, transparent and non-discriminatory manner?

Upon the above said issue our submission is as under :

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Rates are to be fixed by TRAI like for BW. Since USO fund is used and only one agency will be there to deliver fibre, this rate will be mentioned in the document of reverse bidding. This is like setting toll tax on roads in BOT model.

Q.9 What flexibility should be given to the agency in terms of selection of route of laying optical fibre, construction, topology and deployment of technology?

Upon the above said issue our submission is as under :

The design should be finalised by BBNL centrally where USO fund is used. The inputs may be obtained from prospective bidders (first go for EOI and pre qualification) and then declare the final routes taking social obligation of services as mandatory requirements. Later on the allotted bidder in that geography can extend the fibres based on business viability to increase geo penetration. Against USO fund provision for viability gap, BBNL can mention revenue share of fix amount in the bid. The detailed document can be prepared.

Q.10 What should be the methodology of funding the project? In case of VGF, what should be the method to determine the maximum value of VGF for each State/ service area and what should be the terms and conditions for making payments?

Upon the above said issue our submission is as under :

The present revenue (ARPU) at block level can be one of the criteria. The distance to cover (the cost to provide fibre for social service) to GP. The income index of district. Population at GP level. In hilly terrain, the cost of digging is very high and social obligation with underground provision will cost very. These exceptions can be assigned to electricity boards of the states as they are already doing the social service and their poles can be used and they can take up IP1. this will help them to modernise the monitoring and control system of electricity boards. The policy decision or regulatory guidelines will help. This will easily ensure FTTH in hilly area as electricity is reaching the house and there will be very small incremental cost.

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Q.11 What kind of fiscal incentive and disincentive be imposed on the agency for completing the project in time/early and delaying the project?

Upon the above said issue our submission is as under :

Incentive on early completion and quality (No NON COMPLIANCE) may be defined in bid so that social services can be started early. On disincentive part double the penalty will be imposed of whatever incentive is defined and USO fund will not be disbursed. The fund dispersion may be linked with connectivity.

Q.12 What should be the tenure/period after which the ownership of the project should be transferred to the Government?

Upon the above said issue our submission is as under :

Why should Government take back? No precedence exists. Let it be owned and operated. Taking over will not be easy task. In case not providing services as per SLA, then heavy penalties and taking over should be the only option. This can be only in that condition. Again it should be outsourced. What benefits will you get in taking over? Who will take over? when? wherefrom organisation will come? what will happen to the organisation of agency whois maintaining? Perhaps these questions justify that taking over is not a solution and not required.

Q 13 Do you think that some measures are to be put in place in case the executing agency earns windfall profits? How should windfall profits be defined?

Upon the above said issue our submission is as under :

When demand increases windfall profits come. In this case since rates are defined by TRAI to avoid monopolistic approach, the possibility of leasing fibres by more operators is only possibility to get more revenue. Since revenue sharing is proposed in terms and conditions, BBNL will also gain more.

... - 10/-





# Society for Incredible & Integrated Development

(The Making of Integrated Development - A Way for Incredible Life of Society)

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**Roop Chand**

**Shiwa Shanker Singh**

**Vivekanand Yadav**

Q.14 Whether there is a need to mandate the number of fibres to be offered as a dark fibre to other operators to ensure more than one operator is available for providing bandwidth at GP level?

Upon the above said issue our submission is as under :

There should not be any restriction for leasing fibres except that operator who is leasing can't sublease to others. Discount on leasing more fibres can be avoided to stop this practice.

Q.15 What measures are required so that broadband services remain affordable to the public at large?

Upon the above said issue our submission is as under :

Since sharing is done and TRAI is fixing the rates, the CAPEX and OPEX will be low to service provider. hence rates will be affordable. In license condition of serving in rural is there and therefore, fair competition will also be there.

Q.16 What safeguards are to be incorporated in the agreement entered between Government and executing agencies if RoW is not being granted to the executing agency in time?

Upon the above said issue our submission is as under :

SLAs are to be signed off with RoW agencies and tracked centrally as social service provision will be impacted. Provision of auto RoW approval beyond SLA can be defined so that RoW authorities are forced to meet SLAs. Blanket RoW permission should be responsibility of central agency and to be committed in RMA(Responsibility Matrix Assignment).

Q.17 The success of BOOT Model depends on participation of private entities which will encourage competition. What measures should be adopted to ensure large scale participation by them?

Upon the above said issue our submission is as under :

BOO is proposed. In this private as well as State SPVs, PSUs etc should be allowed to participate. The qualification criteria

... 11/-





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should be simple and to be worked out based on local geographical factors to have locals associated in the project. Since fibre infra is not a very specialised job, the experience criteria can be relaxed to all agencies (water / gas / sewer pipe laying, electric cable laying/underground utility laying agencies) may be considered for experience. Before start of work for such agencies skill development can be encouraged for fibre specific works like laying precaution, DIT, Blowing, Pulling, splicing, testing etc. it is / Diploma / Engineering colleges are there all across the country. This will create work force also. For machine purchase special loans may be encouraged to unemployed youth in local geography (district level say). These steps will bring local involvement with belongingness and development of respective area from the very beginning. People try to form cartel in such big jobs. The cartels can be avoided by encouraging participation of all underground utility contractors. On financial strengths method of loan on project may be worked out with financial institutions. This way reasonable rates with local participation will be possible.

Q.18 Please give your comments on any other related matter not covered above.

Upon the above said issue our submission is as under :

- a. Single agency for integrated network with long term vision.
- b. Don't allot works to CPSUs on nomination basis. treat them as competitor. they keep on failing and no action. the responsible owners should be penalised with clear RMAs at all levels. USO funded block to district works were allowed to CPSUs in Assam and NE against bidding. They have not done and no action taken. Till you treat them like contractor they will not be serious. Start taking action like black listing, allowing works at risk and cost etc., they will deliver. In NOFN also review failures and stop allotment by nomination basis.

... 12/-





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**Shiwa Shanker Singh**


**Vivekanand Yadav**

We hope that above points shall be considered deeply for grand success of the project and save the hard earned money of the country.

Society will welcome any further query.

Thanking you.

Sincerely yours,

  
Madhukar Gupta – Advocate  
General Secretary

Date: 06-12-2015

CC to :

1. Hon'ble PM, PMO, New Delhi – 1
2. Minister of Information, Technology & Communication.

