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Dated: 10.06.2021

To,

Shri Sunil Kumar Singhal
Advisor (BB&PA),

Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
JawaharLal Nehru Marg,
New Delhi – 110 002.

Subject: Response to Supplementary Consultation Paper on Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed

Dear Sir,

This is in reference to TRAI's Supplementary Consultation Paper on "Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed". In this regard, please find enclosed our response for your kind consideration.

Thanking You,

Yours' Sincerely,
For Bharti Airtel Limited

A handwritten signature in black ink, appearing to read 'Rahul Vatts', is written over a light blue rectangular background.

Rahul Vatts
Chief Regulatory Officer

Encl: a.a

Supplementary CP on “Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed”

At the outset, we would like to thank the Hon’ble Authority for providing us an opportunity to express our views on the TRAI’s supplementary consultation paper on ‘Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed’.

Introduction

Broadband Connectivity is the bedrock of Hon’ble PM’s vision on Digital India. Highspeed Connectivity has never been more important, and the world’s reliance on the ubiquitous broadband has never been greater.

The COVID-19 pandemic has demonstrated the fundamental nature of telecommunications and the criticality of digital technologies to societies and economies. Broadband access and services have helped to ensure the functioning of emergency services, allowed separated friends and families to stay informed and keep in touch, and enabled large parts of the workforce and enterprises to continue to be productive throughout the crisis. If anything, the pandemic has renewed focus on the value of connectivity.

The stated vision of the Government is to transform India to become a \$5 trillion economy of which US\$ 1 trillion is expected from the digital economy. **The vision of Atmanirbhar Bharat (Self-reliant India) means that we leverage connectivity and digital technologies to support economic backbone of country** i.e. MSMEs, encourage local economies and provide opportunity to workforce to work from anywhere.

As connectivity emerges a key component of economic well-being and cohesion, the roll-out of highspeed broadband networks is being accomplished by wireless networks and when higher capacities are required, even through fixed line networks. Although, most of the country’s population is now covered with mobile broadband, increasing the reach of highspeed broadband infrastructure and services to everyone is one of the great challenges of our time.

The creation of digital infrastructure requires massive investments. Hence a holistic policy approach is necessary to focus on attracting and incentivizing investments into these highspeed broadband networks, both wireless & wireline, without any discrimination. This is going to become much more important in the 5G era of intelligent connectivity.

In subsequent paras we identify the challenges to deploy highspeed broadband networks and fiber, and also provide our recommendations:

A. Challenges for roll-out of broadband networks:

1. Unviable financial Model:

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Telecom operators struggle to maintain viable Average Revenue per User (ARPU) even in urban areas and situation gets worse in rural areas where the utilization of infrastructure, and revenue realization is much lower. This lack of economic viability prohibits effective, sustainable investments into creation and deployment of highspeed digital infrastructure.

Therefore, lack of viable financial model is a major reason for lack of infrastructure deployment.

2. Rights of Way (RoW) as fundamental bottleneck leading to low and slow Fiber Deployment:

In India, fiber deployment to the last mile and from last mile to the core telecommunication facilities is a huge challenge. Leave aside rural areas, even in urban areas fiber deployment is lagging due to **archaic policies, complicated RoW permissions from multiple authorities and agencies at exorbitant charges, and lack of open support from local/state Governments**. Even where permissions are granted, the exorbitant ROW fee is charged (details in annexure-A) making fiber deployment commercially unviable. Further, post ROW permissions, telecom operators face challenges in work execution due to delay/denial tactics by the local bodies such as Councilors, RWAs.

It is one fundamental reason for India to remain significantly under-fiberized with close to 1/16th of China’s fiber deployments, reaching barely 7% of our homes. Contrary to this, China has more than 40-Million-kilometer route fiber, connecting more than 70% homes and all of private & government buildings. Similarly, Japan, South Korea & Taiwan have 100% of their homes connected on fiber, enabling them to lead 5G deployments.

3. Upkeep and Maintenance of existing Infrastructure:

Often damages are caused to the laid fiber by various Government agencies during various projects such as Road widening, laying of Sewer/ Water pipes, Electric cable laying etc. These projects are undertaken without giving any prior intimation to telecom operators. There are no provisions for any compensation or coordination for restoration of damaged fiber. This not only causes inconvenience to customers but also results in significant increase in maintenance costs.

We believe that **strong, collective effort is needed to address these challenges**.

B. Our Recommendations.

There is significant opportunity to grow highspeed broadband penetration. Telecom sector has been flagbearer of effective industrial / competition driven infrastructure policy achievement.

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Proactive, targeted policies are required to support infrastructure investment into highspeed broadband networks up-to last mile. Any incentivization should be from the perspective of attracting investments into infrastructure, lowering cost of deployment of infrastructure and viability of business.

To do this, the following policy enablers are necessary:

1. Focusing on Metros and Top 1000 Cities for the purpose of Fixed Line/ wireline broadband:

As per various estimates¹, the urban centres in India generate over 60% of India’s GDP which contribution is likely to reach 75% this decade. As per National Sample Survey² (NSS) 73rd round (2015-16), almost 50% of India’s MSMEs were urban during the period 2015-16 employing nearly 55% of MSME workforce.

During Pandemic there has been a surge in work from home, medical consultations support, continuing of economic- activities by MSMEs / enterprises remained urban/city/town centric. Therefore, priority focus of broadband deployment should shift towards urban/city areas to start-with.

- **The demand for broadband is more in Metros and Top 1000 cities.** For building and maintaining the broadband infrastructure, TSPs need massive investments and for sustenance of their business, they need higher ARPU
- Thus, it is suggested that Government prioritise to connect the Metro and Top 1000 cities ***first*** to boost the economy and to meet the higher demands for bandwidth of those retail customers and businesses, who are in a position to pay more to the TSPs. This would immediately spur viable economic model which can then be used to expand into rural areas.
- The Government has initiated Bharatnet, and Fiber has already been laid in around 1.5 lakh Gram Panchayats covering 4,38,308 Kms. **However, there is no effective utilization or demand for this Infrastructure in rural hinterland.**

2. Ease of deployment of infrastructure for faster network penetration

Under the five pillars of self-Reliant India, infrastructure is recognized as an identity of the country, the government has to recognize the importance of RoW policies for speeding the faster highspeed broadband penetration. The need is to bring a sense of urgency to hasten the digital infrastructure rollouts at the local levels and at affordable costs with consistency and uniformity.

¹ <https://www.financialexpress.com/economy/three-fourth-of-indias-gdp-to-come-from-urban-population-if-these-reforms-are-made/1668629/>

² <https://msme.gov.in/sites/default/files/MSME-AR-2017-18-Eng.pdf>

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The Government needs to do more on the RoW front to urgently transform from current tedious, complex and expensive RoW permissions and procedures at the state and local levels, to more unified, efficient, effective, real-time and affordable one. Hence, we suggest:

- Expedite RoW permissions (with deemed approval provision) under Single Window Clearance
- Immediate and uniform implementation of RoW 2016 rules by all the States
- Mandatory provision of ducts and other telecom infrastructure in all new buildings
- Allow structured aerial fiber for rapid rollout in dense urban environments & difficult areas
- Allow use of existing Electricity Board poles, Metro Pillars, Gas pipelines etc for light weight Optic Fibre to be clamped with right accessories to accelerate the pace of rollout.
- Telecom Operators to be intimated and compensated in case of any damage to already laid cables by utility agencies such as Road widening/ Metro works/ EB cable laying works. At the very least, the telecom operators should be allowed to lay Telecom ducts in the same trench, where the work is happening to facilitate quick permanent restoration.
- If RoW charges waived off, consider mandatory common ducts & fiber sharing at nominal rates
- RoW permissions by RWAs, Commercial enterprises / Malls etc should be streamlined including provision of deemed approval)

3. Lower the cost structure of Industry

Reducing network deployment and operation costs are key to closing the infrastructure deficit as TSPs often struggle to deploy highspeed BB networks not just in the rural and remote areas, but also in urban areas as deployment costs can be prohibitive (e.g. spectrum costs), revenue lower and logistics complex (e.g. *RoW, equipment procurement*). Considering this, we submit:

- Lower the indirect taxes (excise and custom duties) on CPEs
- Waive off RoW Charges (or at least restrict it to onetime cost of restoration).
- Allow pass-through on the revenues earned by sharing of digital infrastructure between TSPs.

4. Encourage networks investments & setting up of digital infrastructure by lowering the license fee for all types of services so as to ensure no arbitrage risks in a converged digital ecosystem:

Increasing digitalisation, convergence of network technologies & mediums, and bundled service offerings are increasingly blurring the distinctions between service offerings.

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Increased investments for network deployment and reduced operation costs are key to creating the digital infrastructure. Therefore, the policy intervention (including the incentives) should be made in non-discriminatory manner such that any incentives are applicable to all mediums that carry, support and deliver converged services through digital ecosystem. This is also necessary to ensure no revenue arbitrage by any operator and no loss of exchequer to Government.

It is important to highlight that in the past differential license fee rates led to arbitrage opportunities and in order to address the same, TRAI and DoT both came out with a uniform license fee rate across all licenses / services.

It is thus desirable that regulatory incentives should not become an opportunity for unintended arbitrage in the regulatory framework.

In such a situation the best approach is to have a ‘*uniform lower rate of license fee*’ for all mediums that support creation of digital infrastructure instead of exemption of license fee for a particular mode of network service.

C. Demand side aspect of BB:

In chapter 3 of the CP, the TRAI while covering demand side aspects, acknowledges the factor of supply side issue. While dealing with demand side, and suggesting to apply ‘nudge’ theory by way of Direct Benefit Transfer (DBT) to individuals, the TRAI seems to suggest that concern for slower uptake of fixed BB may be due to affordability of services. It therefore suggests options such as DBT / Cash transfers to individuals / class of customers who cannot afford it on the lines of PAHAL scheme.

However, we believe that issue of demand side arises only when:

1. There is infrastructure in place,
2. Supplier competition is present but
3. Competition is unable to serve the consumer needs at price points which consumer is ready to buy it but supplier is unable to provide it at those levels due to cost factors.

In such cases, one can explore whether DBT can be one of the options to prop-up demand/uptake or a subsidy to supplier is a better approach. **However, in our view, the purpose of DBT to individual is to provide for inclusion under social welfare schemes and providing DBT to consumer for fixedline BB cannot be equated to a welfare need support.**

In order to give benefit to customer, rather a removal of 18% GST on Broadband bill which is paid by a customer will lower the cost for existing BB service as it will provide immediate cash in hand (Equivalent to DBT) benefit to customer in form of lower outgo. This is also in line with Telecom being an essential service.

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In our view any other type of DBT support (e.g. cash transfer like PAHAL scheme) for any specific service type may not be right solution as this will not help in creating last mile infrastructure first.

Also, from a competition perspective, we believe the access and supply side competition best promotes consumer surplus than any form of direct transfer to the consumer. Even the previous experience of the removal of Fixed Termination Charge (FTC) did not generate any consistent demand, and rather the wireline subscribers actually reduced in the last 5 years, even in cases where it was existing.

It is important to highlight that under the NDCP-18 the very concept of ‘incentive/incentivization’³ has been envisioned to catalyze the investment for the digital communication sector, therefore, the incentives (whether indirect or direct) should be for TSPs to lower their deployment costs and make them invest in the digital infrastructure.

With the above background and submissions, please find below our response to the questions raised in the supplementary consultation Paper.

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?

AND

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?

Airtel’s response

Telecommunication industry is capital intensive. The approach for incentivizing the proliferation of highspeed broadband networks should encourage the sustainable investment in the underlying infrastructure which are necessary for delivering the broadband services in the country.

Considering the overall challenges in rolling-out digital infrastructure network in general, we believe the issue requires a much more holistic strategy:

³ NDCP-18’s Para 2.1 read with Para 1.1

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1. **Creating the infrastructure first** - we believe the focus of policymakers must shift to towards removal of supply side bottlenecks (i.e. RoW) to proliferate broadband infrastructure across top 1000 cities of India. This will spur economic growth multi-fold. It means putting sustainable investments in converged infrastructure and network service.
1. **Lowering the cost of deployment for each connected home** e.g. import duty on hardware: One of the major expenses that the TSPs incur is on the taxes and duties that are levied on importing the equipment which would be network equipment or end use equipment. This duty of around 20-22% increases the cost of equipment considerably resulting in affordability issues with the customer.

There is an urgent need to bring down the input costs for rolling- out the network infrastructure in the country, which are mainly due to RoW, restricted access to building complexes and societies and higher cost of installation and maintenance of fixed line network infrastructure. Furthermore, the present realization of revenue per user is not sufficient to recover the cost incurred by the TSPs for their broadband services.

It is critical that any policy intervention encourages networks investments and setting up of digital infrastructure by lowering the license fee for all types of services so as to ensure no arbitrage risks in a converged digital ecosystem.

While the above will help on the investment in infrastructure creation, the other aspect of providing services without incurring loss is important. This may need support from government through USO fund.

Therefore, we believe following steps are necessary for proliferation of the highspeed broadband network in India, in the following manners:

1. **Indirect incentive in form of lowering of license fee across all network services so as to ensure no arbitrage on license fee.**
2. **Direct benefit in the form of incentives from USO Fund for roll-out of Broadband network service.**
3. **Subsidization of hardware cost incurred on each connected home for broadband network service.**

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?

AND

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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?

AND

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?

AND

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

Airtel’s response

Increasing digitalization, convergence of network technologies and mediums, and bundled service offerings are increasingly blurring the distinctions between service offerings. Increased investments for network deployment and reduced operation costs are key to creating the robust digital infrastructure that is capable to carry broadband traffic.

Therefore, the policy intervention (including the incentives) should be made in non-discriminatory manner such that any incentives are applicable to all mediums that carry, support and deliver converged services through digital ecosystem. This is also necessary to ensure no revenue arbitrage by any operator and no loss of exchequer to Government.

It is important to highlight that in the past differential license fee rates led to arbitrage opportunities and in order to address the same, TRAI and DoT both came out with a uniform license fee rate across all licenses / services.

It is thus desirable that regulatory incentives should not become an opportunity for unintended arbitrage in the regulatory framework.

In such a situation the best approach is to have a ‘uniform lower rate of license fee’ for all mediums that support creation of digital infrastructure instead of exemption of license fee for a particular mode of network service.

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Keeping the definition and requirement simple, unambiguous and enforceable is not just desirable but also effective. Any other mechanism will lead to complexity, interpretational issues and unnecessary compliance challenges.

Therefore, the best way to handle this concern is to have a ‘single low uniform rate of license fee’ across network services i.e. 1% of AGR.

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?

Airtel’s response

Direct incentive for proliferation of broadband networks can be mapped based on TSPs roll-out. TSPs may submit the self-certification after the roll-out of broadband networks, which may be certified by the authorized person of the TSP.

We re-emphasize that following is essential for proliferation of the highspeed broadband network in India:

- 1. Indirect incentive in form of lowering of license fee across all network services so as to ensure no arbitrage on license fee.**
- 2. Direct benefit in the form of incentives from USO Fund for roll-out of Broadband network service.**
- 3. Subsidization of hardware cost incurred on each connected home for broadband network service.**

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.

Airtel’s response

The concerns on RoW challenges have been highlighted by industry ad-nauseam, and also acknowledged by TRAI and DoT in past. However, on ground implementation remains far from satisfactory. We believe until this piece is streamlined and sorted, the struggle with slow and low fiber penetration in the country will continue.

There is **increasing need for installation of Small Cells**, particularly in City shopping centers, transport hubs, public facilities etc. where small cells are often the only viable solution to provide the needed quality network coverage. The Common examples of street furniture used for small-cell networks include utility poles, billboards, lamp posts, lit signage, mailboxes, park benches, traffic signals and other structures.

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The challenges in getting access to public places and street furniture for installation of small cells are summarized below:

- To make street furniture suitable for small-cell networks, the need is to accommodate power, antenna, and associated cabling equipment. It may be prudent to **establish norms related to the size and number of small cells deployed on any single street furniture infrastructure.**
- Street furniture must have a power source for the wireless equipment to function. that have a nearby power source. **Power requirements may also be specified to ensure only authorized equipment is deployed over shared street furniture.**
- **Allow wider reach at reasonable cost - Small cells should be permitted to be deployed in or on the existing structures like government buildings/railway stations/metro rail stations/ airports/ stadiums etc.** as well as private buildings which are accessible to public like malls/ shopping complexes/multiplexes/theatres etc. at reasonable cost which would remove a significant hurdle in the deployment of small cells.
- The present system of granting access to public spaces/ structures for installing small cells varies by state and the local body/agency, and this needs to be made uniform in its application with simple and efficient processes to award permits.
- **Unrestricted access to utility poles:** Another major cost component in spreading the infrastructure is cost paid to the local bodies for using the govt infrastructure. The Government should consider not levying any charges/fees for TSPs to use this infrastructure which will help in faster and cost-effective rollout of broadband networks.
- **Unrestricted access to RWAs:** One of the major bottlenecks in network rollout is restrictions imposed by RWAs and exorbitant charges that are imposed by the resident associations for getting access to societies/colonies. Efforts should be made to ensure through local Municipal authorities that no fees/onetime charges should be levied and unrestricted access should be allowed to TSPs. The concept of deemed approval may be mandated by the local Authorities.

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As per a GSMA report⁴, some regulators are moving to facilitate next-generation infrastructure investments by streamlining approval processes. These measures include simplified, transparent, and standardized application and review processes for small cell siting, exempting small cells that meet certain set criteria from reviews of environmental and historic site preservation organizations; and accepting declarations of compliance for network operators without requiring routine post-installation measurement of power density.

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

Airtel's response

While, the RoW Rules, introduced in November 2016 by the DoT, aimed at expediting the building of telecom infrastructure, its implementation on ground across States have not been on expected lines.

- Different State Governments have adopted different rules, criteria, and timeframes with disproportionately higher charges causing significant amount of effort and delays in getting the necessary clearances.
- The fees or charges often applied to raise revenue for the local / state governments rather than supporting the development of local economy or ease of living of local community.
- Thus, non-availability of faster permissions and high charges are major hindrance in faster rollout of micro cells/small cells which are required for deeper penetration of network, reduction in call drop and improvement in Quality of Services.
- Please refer to annexure “A” showing average indicative varying Row rates of major cities of India

It is submitted that RoW rules may be in line with framework issued by UK, Japan, Singapore, USA and EU. **The following guidelines for permitting access to public infrastructure /street furniture may be considered:**

⁴ REALISING 5G'S FULL POTENTIAL: SETTING POLICIES FOR SUCCESS, MARCH 2020

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- **Charges, if any, are to be only levied in case of any defacement of such structures, and must be limited to no more than restoration charges.**
- Right of Way without payment of any charges to be granted for installation of small wireless equipment /small cells on existing street furniture viz. poles, towers, buildings and other structures.
- Follow the national ICNIRP Standards for EMF radiation for small cell power classes when developing regulations related to compliance with radiofrequency exposure limits.
- Adopt simplified procedures for building/street furniture permits for small cells based on standardised size, installation requirements and radio characteristics.
- Exempt small cell installations from location registration requirements.
- Facilitate access to existing structures, electrical power and fiber /wireless backhaul.

10. 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?

Airtel's response

Firstly, most telecom operators publish their existing coverage & reach on their website / portal/ apps. Any customer query on provision of broadband service in the city/locality is addressed immediately and in case connectivity is not available, the same is informed to the customer and this information is used to devise future rollout strategies. Customer can register his interest on portal. Thus, the current processes in place are working fine from the customer point of view.

Also, as operators we use all possible channels (i.e. digital modes-whether website or apps etc.) to drive demand once our services are available in the area, hence we do not see any need for any ex-ante regulatory mandate or intervention in this regard.

11. 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.

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And

Q. 12: 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?

Airtel’s response

Please refer to our context setting submissions in Section C at the start of our response, read with our responses above.

Considering the convergence of technologies and services, a DBT to an individual based on an economic-criteria will be very complex as it will be difficult to adjudge which customer’s economic need is better than the other to get such support. Further, it does not guarantee that a Fixedline BB can reach last mile to his home/enterprise, which can only happen if investments can be made to create digital infrastructure and networks.

Further, TSPs can’t be compared with Gas / PAHAL welfare, and this approach is unlikely to spur any meaningful investment into infrastructure creation which is the real need.

In fact, an equitable comparison could be that of road construction as giving direct benefits to the car buyers (for car/fuel) will not create the road infrastructure on which the vehicle will run.

However, we believe that **GST exemption on the broadband bills** issued to the consumers can be a better solution if customer has to be given some direct cash support. Telecom is an essential service today. The GST which is currently at 18% on the bill of the consumer should be completely done away with. This will directly benefit the customer by savings his cash outgo.

Therefore, removal of 18% GST on broadband bill is the best form of direct support to every customer.

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Q. 13: Any other related issue.

Airtel's response

Considering the telecom sector's capital-intensive nature, there is a need for reform in the 'licensing and regulatory regime' to catalyze investment and innovation, and ease of doing business by:

- simplification of AGR definition and
- rebalancing of the present Tariffs to recover the cost incurred by the TSPs to deliver the telecom services.

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Annexure -A

S.NO.	City Name	Charges
		(Rs / Meter)
1	Agra	420
2	Ahmedabad	50
3	Ambala	100
4	Amritsar	200
5	Bangalore	730-850
6	Bhopal	280
7	Bhubaneswar	860
8	Chandigarh	360
9	Chennai	560-750
10	Coimbatore	740
11	Cuttack	870
12	Delhi NCR	600-2000
13	Guwahati	720
14	Hyderabad	1500-4500
15	Indore	280
16	Jaipur	300
17	Jalandhar	200
18	Kanpur	2600
19	Karnal	100
20	Kolkata	5550-6500
21	Lucknow	2600
22	Ludhiana	200
23	Madurai	1800
24	Manali	1618
25	Meerut	525
26	Mumbai	9100-13000
28	Patna	225
29	Pune	5500-11000
30	Raipur	300
31	Ranchi	325
32	Shimla	3140
33	Surat	50
34	Varanasi	950
35	Vijayawada	1800
36	Visakhapatnam	780