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**To :**

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**Subject:** Comments on TRAI Consultation Paper No. 9/2011

“Allocation of Spectrum Resources for Residential and Enterprise Intra-telecommunication Requirements / Cordless Telecommunication Systems (CTS)”.

### **Company presentation**

Gigaset Communications GmbH is one of the world’s largest manufacturers of cordless phones and the clear market leader in Europe for DECT phones. With its headquarters in Munich, the company develops, manufactures and distributes high-quality products. Its portfolio includes fixed-network phones, Voice over IP devices and telephone systems. The primary production site is in Bocholt, Germany, where the Gigaset products are manufactured under the most stringent quality and environmental standards.

### **Issues for Consultation**

First of all Gigaset Communication GmbH likes to thank TRAI for the opportunity to comment on Consultation paper No. 9/2011. Most questions were deeply discussed during consultation in February 2010. The collection of arguments is found in clauses 2.8.x of this Consultation Paper. Gigaset Communication GmbH likes to concentrate on the new Question 3.5 and add technical comments to Question 3.6 and 3.8.

**3.5 Do you agree that the 1880-1900 or 1910-1920 MHz band (TDD Mode) be allocated for digital CTS applications? If yes, what should be the limits of emitted power (EIRP), power flux density (pfd), antenna gain etc?**

Because there is a lot of technical experience worldwide about DECT, it can be noted that the radio limits given in the DECT specification hit the user demands and on the same time no interference issue took place worldwide. Because of that Gigaset Communications GmbH recommends taking the radio limits found in the DECT Standard EN301406.

**3.6 Do you see any coexistence issues between existing cellular systems using adjacent band with low power CTS allocations in 1880-1900 or 1910-1920 MHz band?**

With reference to the use of 1880-1900MHz band for digital CTS and its interference possibilities into the adjacent cellular bands, as indicated in this paper at 2.8.3 there are plenty of documented studies on this subject as well as practical implementation in the developed world to indicate that adjacent band (cellular) interference issues do not exist. All over the world, including America and Europe, DECT systems are coexisting with cellular systems both in the 1880-1900MHz and 1910-1920MHz band.

**3.8 Will there be any potential security threat using CTS? If yes, how to address the same.**

CTS is using the public PSTN network like wired phones. No difference. Furthermore, the digital CTS radio link uses ciphering and authentication with the same security level as GSM/UMTS, thus providing secure private communication within the residential or enterprise space. This is one of the main reasons for the popularity of DECT systems globally as against the other private space services provided by commercial public telecom service providers.