

Email**Manoj Kumar Verma****Fwd: Comments on issues related to Low Power Small Range FM Radio Broadcasting**

From : V.K. Aggarwal <jtadvbcs-1@traf.gov.in> Mon, May 15, 2023 10:02 AM
Subject : Fwd: Comments on issues related to Low Power Small Range FM Radio Broadcasting
To : Manoj Kumar Verma <sro-bncls1@traf.gov.in>

वी के अग्रवाल
संयुक्त सलाहकार
प्रसारण एवं केबल सेवाएं
भारतीय दूरसंचार विनियामक प्राधिकरण
महानगर दूरसंचार भवन
जवाहरलाल नेहरू मार्ग, नई दिल्ली, 110002

V K Agarwal
Joint Advisor (Broadcasting & Cable Services)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi - 110002
Tel: +91-11-23664504

From: nchsebpl@gmail.com
To: "Anil Kumar" <advbcs-2@traf.gov.in>, "V.K. Aggarwal" <jtadvbcs-1@traf.gov.in>
Cc: "mani ramesh2k" <mani_ramesh2k@hotmail.com>
Sent: Thursday, May 11, 2023 1:26:47 PM
Subject: Comments on issues related to Low Power Small Range FM Radio Broadcasting

To,
Shri Anil Kumar Bhardwaj
Advisor (B&CS)

Ref: Our registration with TRAI/ CAG/11/2013-CA date 17/04/2023
Dear Sir,

The NCHSE has the following comments to offer for consideration while **finalising** the policy on Low Power Small Range FM Radio Broadcasting:

Q 1. Should the use of low power small range FM Radio broadcasting by various entities be licensed or unlicensed? Please provide your comments with detailed justification.

Ans. To have a control of Govt. and to implements the various development improvement/restrictions in future on implement agency of Low Power Small Range FM Radio

Broadcasting services, licensing should be necessary. If they are not licensed, they are free to use the services as per their choice and will have freedom to use it for their benefit only. It may happen that national security and some time internal security may be in danger. Internal peace amongst various communities can be disturbed so over all licensing system must be there.

Q 2. In case use of low power small range FM Radio is licensed, whether there is a need for the introduction of a new category of service provider for using low power small range FM Radio broadcasting? Please provide your comments with detailed justification.

Ans. Yes, there is need for the introduction of a new category of service provider for using low power small range FM Radio Broadcasting. We should not compare CRS with this as their field as well as area of operation are different. Besides this, coverage area is also limited in case Low Power small Range FM Radio Broadcasting. If we do not have new category of services provider, than service and terms & conditions of CRS may be applicable to low power small range FM Radio Broadcasting system also which may not be justified.

Q 3. Should the low power Radio equipment continue to be subjected to type approval by WPC?

a. If yes, do the current technical specifications / approval process require any amendment/ modification/ simplification?

b. b. If not, please suggest as to how to ensure quality standards for the equipment and users of low power FM services.

Ans. Low Power Radio equipment must be approved by WPC, because.

1. Check the noise level
2. Check the instrument that are used in low power small range FM Radio is standardized or not and its specification **is** approved or not.

With two issues that are prevalent presently in getting approval of WPC, we do not think any change at present.

Q 4. In case stakeholders consider that license is necessary for low power small range FM broadcasting, what should be the:

- (a) Eligibility criteria**
- (b) Period of License**
- (c) Entry Fee**
- (d) License Fee**
- (e) Area of operation**
- (f) Allocation of Spectrum**
- (g) Technical parameters**
- (h) Any additional terms and conditions governing such licenses.**

Ans. License is necessary for Low Power small Range FM Radio Broadcasting taking into consideration the following issues.

(a) Eligibility criteria:- The criteria of CRS should apply in low power small range FM radio broadcasting also.

(b) Period of license:- The system is introduced first time in India therefore, the period of license should be of three years instead of 5 years and there after the renewable will be of 7 years. In the first three years Govt. can check the performance of low power small range FM Broadcasting, its utility in the community and what improvements can be done to popularize the system.

(c) Entry fee:- We suggest that no entry fee should be charged .

(d) License fee:- Since the area of operation of Low Power Small Range FM Radio Broadcasting is limited to particular field of operation, we suggest that both entry fee and License fee remain free just like CRS. But the annual charges may be taken for use of

spectrum. Initially to settle the system for the first three years an annual charges should be lower than the CRS of that area.

(e) **Area of operation:** The area of operation of low power small range FM Radio broadcasting is very limited locations as it is just beginning in India and as such initially there would not be difficulty to allot frequency spots, which should be below CRS. As far as, area of operation is concern, it can be 5 to 7 km. or so, for each low power FM Raid broadcasting unit.

(f) **Allocation of spectrum:-** It should be decided on auction process conducted by **MIB**.

(g) **Technical Parameters:-** This is technical matter therefore, no comments.

(h) **Any additional terms and conditions governing such licenses:-** Looking to the importance of a particular area licensing policy should be modified before any auction of spectrum takes place.

Q 5. Whether some specific frequencies in the existing FM band can be dedicated for low power FM Radio broadcasting? Please provide details with justification.

Ans. Presently FM band are being used at different frequencies by various agencies and therefore specific frequencies for Low Power Small Range FM Radio Broadcasting should be dedicated in the present FM band to have a trouble free service to public/ audience.

Q 6. What should be the licensed area of frequency assignment- location-wise (Stadium, Auditorium, Malls, Residential complex etc.) or city-wise. Please provide details with justification.

Ans. Licensed area should be location wise. Normally Low Power Small Range FM Radio Broadcasting has a specific field to specialise and as such, if they are in the games/tournaments they would prefer stadium to have a service area, music to auditorium, sale promotion to malls, like that.

Q 7. What should be the maximum power of a low power small range FM transmitter? Please provide your inputs with detailed justification.

Ans. No comments to offer.

Q 8. Stakeholders may also provide their comments on any other issue relevant to the present consultation.

Ans. It will be relevant, if Low Power small Range FM Radio Broadcasting be asked to have a video which they broadcast and preserve it for a month (30 days), so that if MIB wants to check can see the video and decide the future course of action, if so.

With Regards

R.Chandra
Sr.Fellow



National Centre for Human Settlements and Environment

E-5/A, Girish Kunj, Arera Colony, Bhopal

Madhya Pradesh- 462016

Ph.091-755-2463731, 4083376

<http://www.nchse.org>

