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Subject: TAIPA submission on draft recommendations on Ease of Doing Telecom Business

Respected Sir,

1. Tower & Infrastructure Providers Association (TAIPA), is the apex industry Association of Infrastructure Providers category 1 (IP-1). We actively work with various policy makers for accelerating the growth of the telecom tower industry in India. TAIPA members include all key players in the sector i.e. ATC Tower Co., Bharti Infratel, GTL Infrastructure, Indus Towers, Reliance Infratel, Tower Vision India and energy service companies like Applied Solar and Coslight India
2. This is with reference to the TRAI draft recommendations on 'Ease of doing Telecom Business' released on 19th September 2017 for comments of stakeholders.
3. In view of the above, the TAIPA submission on the draft recommendations released by TRAI is enclosed herewith as Annexure – 1 for your kind consideration.



Thanks & Regards

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Introduction:

The Infrastructure Providers Category – I were created by Department of Telecommunications for provisioning of telecom infrastructure such as towers ,cables, ducts, dark fibres, to the Telecom Service Providers licensed u/s 4 of the Indian Telegraph Act, 1885. TAIPA members have been at the forefront of several innovations in the telecom sector especially in deploying and sharing towers in India's varied terrain and responsible for introducing the concept of 'Infrastructure Sharing" which is being emulated globally.

Telecom infrastructure is fundamental for the growth of the telecom services in the country and forms an essential component in the telecom ecosystem. The deployment of a robust telecom infrastructure in the country is necessary for releasing the various transformative initiatives of the Government such as Digital India, Smart Cities, Make in India and Skill India. Thus, it is necessary to address the issues that the telecom infrastructure industry is facing to accelerate the deployment of infrastructure in the country.

However, the draft recommendations released by TRAI does not address the issues faced by the telecom infrastructure industry. The issues and concerns faced by the industry is impeding the roll-out of telecom infrastructure in the country which in turn deprives the consumers for accessing quality telecom services.

Infrastructure providers are the backbone of the telecom sector as they provide tower sharing services. This has reduced duplication of capital expenditure, on account of which long term investments are made to telecom assets which have resulted in expansion and growth of business and increase in reach and connectivity.

As IP-1s have made significant investments in the sector and the tower industry has planned its business affairs and entered into long term contracts at fixed prices. These contracts were based on the existing legal and regulatory regime. There should be no change in the 'goal posts/ rights & privileges' provided to the Infrastructure Providers under their registration certificate.

Changing the rules of the game midway and 'shifting the goal-post' especially after large sums have been invested in the sector is completely arbitrary and unfair.

In view of this, we once again would like to highlight the key issues which are being faced and needs to be addressed. To create a robust telecommunication infrastructure, IP-1s needs to be assured of regulatory and policy certainties not only for speed rollout of critical telecom infrastructure but also for encouraging investor sentiments. Therefore, suitable recommendations need to be included in TRAI recommendations on 'Ease of Doing Telecom Business'.

Telecom Infrastructure Industry seeks the following support from the Government to ensure Ease of Doing Business

1. Inclusion of IP-1s in the Indian Telegraph Right of Way Rules, 2016

IP-1s have not been extended the benefits of the recently notified RoW Rules which has been permitted in their respective Registration Certificate(s) and was the genesis for formation of this industry. However, with the recent Gazette Notification issued by Government of India excludes IP-1s from this provision and is a retrograde step which will force TSPs to invest individually on their respective infrastructure.

DoT has notified the Indian Telegraph Right of Way Rules, 2016 on 16th November 2016 and despite numerous representations have not extended the Rules to **IP-1s**.

As per the terms and conditions of the Registration Certificate of IP-1s, IP-1 infrastructure providers are obligated to provide and share its infrastructure with all licensed telecom service provider licensed under section 4 of the Indian Telegraph Act on a non-discriminatory basis. In this regard, we refer the condition(s) in the Registration Certificate issued by the Department,

Quote

... Infrastructure Providers (IP-1) to establish and maintain the assets such as Dark Fibres, Right of Way, Duct Space and Tower for the purpose to grant on lease/rent/sale basis to the licensees of telecom services

The company shall provide the said infrastructure on a non-discriminatory manner.

Unquote

Such retrograde steps with regard to RoW / Tower installation matters, defeats the whole purpose of formation of IP-1 category.

IP industry needs to be extended the Right of Way Rules to IP-1s also for providing necessary infrastructure and services within the scope of their registration certificate only *to the Licensees of Telecom Services licensed under section 4 of Indian Telegraph Act, 1885.*"

Moreover, State Governments barring a few, are not keen to align their respective State policies with the notified guidelines and is causing tremendous roadblocks for much needed proliferation of telecom/ data services.

2. Issues regarding Government Lands & Buildings availability

DoT has taken some key steps for bringing out reforms in making available Government Land and Buildings for Tower installation in past few months (IP-1s are not included especially in Delhi). However, the industry is still finding it extremely difficult at the implementation level to get such premises at:

- (a) At ground level, IP-1s are not allowed for provisioning of telecom infrastructure on Government Lands & Buildings;

- (b) The Department of Posts guidelines for tower installations is at odds vis-a-viz Central Government notification and has various clauses which are un-implementable in its present form; and
- (c) There are severe challenges and issues with regard to the tower installation / Right of Way (RoW) permissions in the Cantonment areas under civic control of Cantonment Boards as the same are not aligned with guidelines/ policy issued by the Central Government.

Such guidelines are in contradiction to the rights/ established position of the Central Government provided to Infrastructure Providers through their IP-1 Registration Certificate(s) for provisioning of necessary telecom infrastructure in the Government buildings, DoP premises and Defence/ Cantonment areas and is a show stopper for the telecom infrastructure industry.

3. Regulatory Uncertainty/ Retrograde Steps

IP-1s vide their Registration Certificate(s) issued by DoT have been allowed to setup passive infrastructure like Dark Fibres, Right of Way, Duct Space and Tower etc. which can be further given on lease, rental etc to the licensed Service Providers under Section 4 of Indian Telegraph Act 1885.

This scope was further enhanced by DoT vide letter dated **09th March 2009** by allowing IP-1s to provision active infrastructure elements i.e. Antenna, Feeder Cable, Node B, RAN & Transmission System for/on behalf of Licensed Operators.

The enhancement of scope for IP-1s propagated the concept of Sharing of the required telecom Infrastructure to the licensed telecom service providers only which will result in enhanced quality of services by TSPs to the end consumers.

Further, DoT issued another clarification letter dated 28.11.2016, unilaterally mandating all existing IP-1s to seek either a Unified License or a UL-VNO License for provisioning of active network elements, thereby completely nullifying the purpose of its Policy letter issued earlier on 09 March, 2009. The Government has made a complete U-turn through the said directive forcing the IP-1s to obtain a License (and pay License Fee) which was not required prior to 28.11.2016, thereby increasing the costs of services.

Moreover, such infrastructure i.e. antenna, feeder cable, Node B, Radio Access Network (RAN) and transmission system, coaxial cable, combiners, splitters, directional couplers and passive antennas etc when installed by IP-1s, if not powered, can not be termed as 'Active Infrastructure' and must be allowed for sharing and ultimately used by and amongst licensed TSPs. It is pertinent to mention that Infrastructure Providers are neither permitted (as per their Registration Certificate) nor have any intent to service the end consumers.

It is imperative that the telecom industry move towards convergence of such necessary common infrastructure and overcome the existing segregation of licensing, registration and regulatory mechanisms in these areas to enhance affordability, increase access, delivery of multiple services and reduce cost. It will be a key enabler of equitable and inclusive growth.

Regulatory/ Policy certainties adds to the confidence of investor community and there is an urgent need to re-classify/ redefine 'Common Telecom/ Digital Infrastructure' to include Antenna, Feeder Cable, Node B, RAN & Transmission System, coaxial cable, combiners, splitters, directional couplers and passive antennas etc which must be allowed to be owned and maintained by IP-1s and shared amongst the Licensed Telecom Operators only under its existing Registration Certificate(s).

4. Exclusion of Telecom Towers from availing Input tax credit under GST Bill dated 28 March 2017

The GST Bill, 2017 released on 28 March 2017 has made specific changes in the credit provision in the context of Telecommunication Towers. The GST Bill, 2017 states that Input tax credit (CENVAT credit) (under the heading plant and Machinery) will not be available to tower infrastructure providers, which will have huge impact on the cost of services. Infrastructure Providers will need to include the component of this additional tax implication in its overall costs structure thereby raising the cost of services to TSPs and in-turn would result in significant tax cascading impact, which will naturally be passed on to the end consumers.

This is a complete U-turn by the Government which in its earlier Draft Bill (Nov. 2016) categorically included Telecom Towers within the ambit of Input Tax Credit and is a surprise to the industry as a whole without assigning any reasons.

As per the GST Draft Bill of November 2016, Input tax credit remained unchanged as per the existing Service Tax laws realizing the criticality of mobile tower infrastructure. However, the Final GST Bill dated 28 March 2017 passed by the Parliament, Government completely went back from its earlier stated position and specifically excluded Telecommunication Towers alongwith Land, Buildings & Other Civil structures and Pipelines outside factory premises from extending the benefits as available currently under the CENVAT Rules. It be also appreciated that under the existing Service Tax laws, there is no provision which de-bars or specifically excludes the CENVAT credit on such towers.

The modified definition as per Explanation to Section 17(6) of the Central Goods and Services Tax Bill, 2017 ("CGST Bill") is provided as under:

'Plant and Machinery' means apparatus, equipment and machinery fixed to earth by foundation or structural support that are used for making outward supply of goods or services or both and includes such foundation or structural support but excludes-

(i) land, building, or any other civil structures;

- (ii) **telecommunication towers; and**
- (iii) **pipelines laid outside the factory premises**

The Telecommunication Towers are classified as ‘Plant and Machinery’ for the purpose of books of accounts which are maintained in terms of the provisions laid down under the **Companies Act (both under Companies Act, 1956 as well as Companies Act, 2013)**, such towers have also been consistently and uniformly classified and categorized as ‘Plant and Machinery’ only and the depreciation as required under the Accounting standards/provisions of Companies Act has been charged as applicable to such classification.

Even, as per the current Income Tax laws, mobile towers have been classified and grouped under the block of Asset categorized as ‘Plant and Machinery’. The depreciation has been claimed at the rate applicable to ‘Plant of Machinery’ for the purposes of Income Tax computation and such allowances has been over the years settled.

The telecommunication towers are the backbone of telecommunication Industry and any denial of this credit would substantially increase the cost of providing this service to the common man. Digital India, Smart Cities, providing E-Governance services to the common man, etc and other flagship programs of the Government depends entirely on the availability of critical telecom infrastructure and any tax/ levy on such nation-building installations will ultimately increase the cost structure of the services to the end-consumer.

During the last two decades of unprecedented growth and development of the telecom sector, the semi-urban and rural areas have remained under penetrated either due to inadequate infrastructure or unviable business model. Hence, in the immediate future, the thrust of telecom services would be these semi-urban areas and rural areas where the current tele-density is mere 50% and much focus is needed to connect the unconnected. It is therefore considered critical that the future telecom towers to be rolled out in the semi-urban / rural areas would have to bear the enhanced costs due to the denial of critical CENVAT credit and the ultimate burden of this would be borne or loaded onto the end-consumers.

The primary objective of the Government while introducing GST is to ensure that there is no cascading of taxes and availability of seamless credit at all level of supply chain, the industry expects that under the GST regime inputs credit should be available for all the procurements including Telecom Towers.

5. Off-set License Fee paid on Input Services to avoid Double Taxation

The Department of Telecommunications vide its recent guidelines dated November 2016 has mandated licensing in case IP-1s wish to own, install and share ‘Active Infrastructure’ i.e. antenna, feeder cable, Node B, Radio Access Network (RAN) and transmission system, etc.

Infrastructure Providers IP-1s are into the business of setting up passive infrastructure such as coaxial cable, combiners, splitters, directional couplers and passive antennas etc and it remains passive infrastructure unless lit or powered. These are powered by TSPs for meeting their requirements to make them active infrastructure for providing telecom services to the end-consumers. This is also in alignment with the recent TRAI recommendations regarding 'In-building Solutions' which has the following passive elements i.e. coaxial cable, combiners, splitters, directional couplers and passive antennas etc, and can be provided by infrastructure providers IP-1s.

Even in a hypothetical sense, if IP-1s are to be brought under licensing regime, Government CAN NOT charge License Fee twice on the same revenue i.e. firstly on the Telecom Service Provider and then again on the Infrastructure Providers IP-1. **Further, we would like to highlight that as per the current formula for deriving AGR for TSPs, no deductions are allowed against any payments to IP-Is towards infrastructure provisioning.**

For example, once an IP-1 charges TSP any fee for infrastructure provisioning, the fee paid by the TSP is only out of that revenue stream which is already license fee paid. At all times, the fee paid by the telecom licensee (TSP) to IP-1 will only be out of the revenue stream which is already license fee paid. It is pertinent to highlight and we would like to reiterate that ***“No deductions are allowed on any payments to IP-Is from the GR of TSPs”***.

Licensing of IP-1s will tantamount to 'payment of Double License Fee'

If the IP-1s are also levied any License Fee by putting them under the licensing structure it will tantamount to payment of Double License Fee and will result in unjust enrichment of the Government.

For the purpose of additional clarity, we would like to share that if A's (IP-1) towers are shared by B (TSP) then B (TSP) would pay A (IP-1) the IP fee only out of the revenue on which it has already paid the license fee. Thus, in this scenario, if A (IP-1) has also to pay license fee on the revenues earned out of B's (TSP) revenue stream, it would amount to payment of double license fee as B (TSP) has already paid license fee on the revenue utilized to pay A (IP-1) for Infrastructure usage.

Therefore, suitable deductions to TSPs on its License Fee payments must be available to the License Fee paid by the IP-1s on its revenues from TSPs to avoid double taxation on the same revenue stream or vice-a-versa as it is an input service to the TSPs and both sets of revenues can not be levied license fee together.

6. Levy of Property Tax on Mobile Towers

The issue related to levy of arbitrary and exorbitant, property tax on telecom towers at different rates/amounts by different local authorities including Municipal Corporations, Municipalities and State Governments coupled with coercive actions such as sealing of

towers, disconnection of power supply, nuisance at sites, use of force, and damage to telecom sites etc has again come to light in recent times.

The dispute qua property tax on mobile towers was pending adjudication before the Hon'ble Supreme Court of India and the Hon'ble Supreme Court of India has since held 'Towers as Buildings' vide its Judgement dated 16.12.2016. However, we would like to bring to your kind notice that certain issues i.e. the quantification of the Tax amount and its retrospective/perspective effects have been left open by the Hon'ble Supreme Court to be decided by the appropriate forum.

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The industry approached the Hon'ble High Court of Bombay, as directed by Hon'ble Supreme Court for clarification on quantum and periodicity of the said property tax and the matter is seized for further action/ direction by the Hon'ble High Courts.

Irrespective of highlighting the status of these matters to the Municipal Corporation/ Local Bodies within the State of Maharashtra, several demand notices/ attachment warrants have been issued and adhoc coercive like sealing of offices premise of mobile towers Companies, etc have been initiated on the alleged ground of outstanding tax payments resulting in huge impact on telecommunication service and inconvenience to public at large.

We would also like to draw your kind attention to the issue related to levy of arbitrary, adhoc and exorbitant property tax on telecom towers by the at different rates/amounts by different local authorities including Municipal Corporations, Municipalities and State Governments coupled with coercive actions such as sealing of towers, disconnection of power supply, nuisance at sites, use of force, and damage to telecom sites etc.

Moreover, we would like to highlight that the Hon'ble Supreme Court, in its aforesaid judgment, has made an observation in paragraph 31 thereof that “.. in everyday life, a mobile tower is certainly not a building”.

So far more 250 tower sites including MSC/BSC catering to well over 03 million subscribers have been sealed, removed or demolished by various municipal corporations in Maharashtra resulting in huge impact on telecommunication services on consumers. Needless to mention such coercive action is disrupting smooth telecom operations in respective area whereas other Municipal Corporations are also threatening similar punitive action. Divergent policies/bye-laws of difference Municipal Corporations/ Local Authorities, etc within a State is hampering fresh telecom/tower roll out and coercive actions like mass scale sealing & demolition of telegraph & posts including towers is resulting in significant call drops.

In this regard, we would like to submit that :

- (a) **Mobile Towers fall under the definition of “telegraph” under the provisions of Indian Telegraph Act which is absolutely different and distinct from the concept and meaning of the expression “Building” as used in the various State Acts.**
- (b) The Entry 31 covers the entire field in relation to “Telegraphs” including erection/ installation, maintenance and operation thereof and read with Entry 96 of the same List it covers all and any fee payable in respect thereof.
- (c) Present constitutional and legal framework for Telecommunications is as follows:

Schedule 7 of the Constitution of India consists of three lists as follows:

- List I – Union List
- List II – State List
- List III – Concurrent List

Telecommunication falls under the Union List. Entry 31 & 96 of this list cover all the matters related to telecom and associated fees. As per Part XI described below the Parliament has exclusive powers to make laws with respect to any of the matters covered under Union list, which includes telecom. The State legislative has exclusive powers to make rights related to land, which falls under the State list (list II).

Part XI of the Constitution of India covers the Relations between the Union and the States. Chapter I of Part XI of the Constitution of India relates to Distribution of Legislative Powers between the Centre and the States. Article 246 of chapter I covers subject matter of laws made by Parliament and by the Legislatures of States and is reproduced below:

“246. (1) Notwithstanding anything in clause (2) and (3), Parliament has exclusive power to make laws with respect to any of the matters enumerated in List I in the Seventh Schedule (in this Constitution referred to as the “Union List”).

Entries 31 and 96 of the List I of the 7th Schedule cover telecommunications and related fees. These are reproduced below:

“31 – Posts and telegraphs; telephones, wireless, broadcasting and other like forms of communication.

“96 – Fees in respect of any of the matters in this List, but not including fees taken in any court.”

The laws governing the telecommunications in India are governed by the Indian Telegraph Act, 1885 amended from time to time. Section 7 of the Indian Telegraph Act, 1885 empowers the Central Government to make rules consistent with this Act for the conduct of all or any telegraphs established, maintained or worked by the Government or by persons licensed under this Act.

Moreover, in so far as private properties are concerned; all transactions in terms of the provisions of the Indian Telegraph Act, 1885 would lie directly between the telegraph

authority and the property owner without the intervention or mediation of any local authority.

Further,

- a) Apart from arbitrary and unreasonable property tax being demanded by different authorities in the same State at different rates there is no uniformity in charging and levying such taxes. For example, the rate of property tax varies from 40% to 112% in the State of Maharashtra amongst various municipal corporations/municipalities etc.
- b) When our member company erects Roof Top Tower (RTT) on building being a temporary structure, Municipal Corporations treats them as another building i.e. building on building and sends tax demand notices to our member companies. This is totally unfair to our member companies when land and building is already being assessed for tax and all kind of taxes are already collected from the owner of the said building or land.

Telecom Towers and Telegraph being a Central subject, the State and Local Authorities including Corporations have no competence to levy and collect tax in respect of Telecom Towers.

7. Infrastructure Status benefits

Government of India, has already recognized the significance of telecom towers & the aspect of it being a highly capital intensive business. The Cabinet Committee of Infrastructure (CCI) granted “Infrastructure” status to Telecom Towers vide its gazette notifications dated 27th March 2012 & 1st April 2013. With this the benefits like Accelerated depreciation, Higher ECB limit, Eligible for viability gap funding (VGF), Lower import duties and excise exemption, Softer lending rates, Tax holidays, etc were to be extended.

Moreover, basic support like priority electricity connections, preferential tariffs, etc are still not granted to these critical, life-line installations. Erratic power supplies/ non-availability of electricity also hinders the smooth operations of telecom services and force telecom infrastructure organizations to install DG sets, power storage equipments like batteries, etc thereby increasing the cost of services.

Most of the infrastructure projects like roads, ports, airports etc. have been provided with the above supports besides equity funding from the Government of India.

The Tower industry has already written to the Department of Economic Affairs, Planning Commission and other concerned Department(s)/ Ministries seeking similar benefits. However, despite granting the infrastructure status to the sector, the benefits are yet to be extended to the sector.

Industry has represented its key concerns as mentioned above to the Central Government on multiple occasions, however, are yet to get any support/ benefits on the same. Further, electricity connections should be provided on priority and at preferential/ reasonable tariffs to telecom tower sites as telecom towers are critical and life-line installations.

8. Uniform Tower Installation Policy in States (aligned to DoT RoW Rules)

DoT has framed “Right of Way Rules” on 16th November 2016 laying uniform Guidelines for State & UT Governments for laying of Underground and Overground Telecom Infrastructure. The guidelines covers the following, among other, issues:

- (i) single window clearance;
- (ii) processing of application within defined timelines;
- (iii) nominal one time administrative fee;
- (iv) extension of benefits application to infrastructure industry; and
- (v) priority electricity connection; etc

The Rules envisages smooth rollout of much needed critical telecom infrastructure across the country. All stakeholders, particularly State Governments and Municipal Corporations, are required to adhere to and frame policies in line with the DoT guidelines.

However, despite our regular meetings, presentations and representations with State Governments, in practice, the policies of the State Governments are still not aligned with the central guidelines, resulting in a severe impediment for faster roll outs of telecom infrastructure in respective States.

Moreover, even within a State, various Municipal Corporations have issued different policies, thus creating a plethora of policies, confusion and chaos resulting in unwarranted difficulties and impediments for infrastructure providers/ telecom service providers. For example, in Maharashtra separate Tower Installation Policies have been notified by PUNE MC, MUMBAI MC, GREATER MUMBAI MC, NAGPUR MC, THANE MC, ETC. Further, despite our submissions and regular follow-up efforts, the State Government(s) and Union Territories are continuing with their own, independent Tower Installations policies/ guidelines.

The effect of the actions of the State Governments and Municipal Corporations is to create road-blocks in providing seamless telecom services, connecting the unconnected and hindering the growth of telecommunications in the country.

Some of the key concern areas for State Tower Installation policies include restriction of location of towers, multiple fees and levies, multiple clearances from different authorities, no

provision for prior electricity connections and coercive actions including sealing of towers without prior notice or justification.

In this regard, we would like to submit that the State/UT Telecom Infrastructure Policies be accordingly amended and aligned to the Right of Way Rules 2016 issued by Department of Telecommunications once revised to include IP-1s.

The State/UT Telecom Infrastructure Policies be accordingly amended and aligned to the Right of Way Rules 2016 issued by Department of Telecommunications once revised to include IP-1s.

9. Priority Electricity Connections for telecom towers

Erratic power supplies/ non-availability of electricity has hindered smooth operations of telecom towers and has forced telecom infrastructure organizations to install DG sets, power storage equipments like batteries, etc.

Considering Telecom Towers as life-line installations, priority Electricity connections at reasonable tariffs is a must for smooth telecom operations across the country.

10. Ensuring Security of Telecom Infrastructure

As Telecom Towers needs to be operational 24/7, 365 days and all essential services, emergency services, National security etc. are dependent on these towers and cannot afford to shut down due to any reason. Thus, Security of telecom networks is of paramount to the telecommunication industry. However, Industry faces challenges in ensuring security to the networks because of the lawlessness rampant in some pockets of the country and absence of strict laws. The cases of thefts, vandalism and damage to the critical telecom infrastructure have been on the rise disrupting the operation of telecom services.

Thus, there is dire need to address the security aspect of telecom infrastructure and bring out suitable recommendations on this issue.

Conclusion:

The above impediments both in terms of policy/ regulatory framework as well as operational/implementational challenges/ retrograde steps against the telecom infrastructure industry resulting in call drops, coverage gaps, poor quality of service and network congestion, increase in overall costs structures of the telecom services besides being impediments to the Government' vision of Digital India, Smart Cities, Financial Inclusion, Re-monetization/ Digitization of money transfers, E-governance, Broadband for all, etc. Therefore, there is an urgent need to bring out suitable recommendations for speedy rollout of necessary telecom infrastructure.

It is important that due clarity in Regulatory/Policy Framework on the following is immediately provided:

1. Inclusion of IP-1s in the Indian Telegraph Right of Way Rules, 2016;
2. Availability of Government Lands & Buildings for Tower Installation;
3. Regulatory Uncertainties/ Retrograde Steps;
4. Exclusion of Telecom Towers from availing Input tax credit under GST Bill dated 28 March 2017
5. Off-set of License Fee paid on Inputs Services to avoid Double Taxation
6. Levy of Property Tax on Mobile Towers;
7. Infrastructure Status benefits for Telecom Tower companies
8. Uniform Tower Installation Policy in States (aligned to DoT RoW Rules)
9. Priority Electricity Connections for Telecom Towers
10. Ensuring security of telecom infrastructure

We are also aware that the Ministry of Telecommunication is seized of these issues but the need of the hour is an early resolution of the concerns expressed as above and to have uniform and consistent Policies & Regulatory Framework all across India.