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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)".

Herby ETSI TC DECT is pleased to provide comments on the issues for consultation. The Technical Committee "Digital Enhanced Cordless Telecommunications" (DECT) of the European Telecommunications Standards Institute (ETSI) is responsible for the development and evolution of the DECT specifications.

Issues for Consultation

3.1 Whether the current allocation of spectrum for CTS is sufficient to meet the requirements? If not, then how to meet the demand of cordless telephony spectrum requirements?

Answer: The current license exempt spectrum is not sufficient. The demand can be met by allocating license exempt spectrum (protected by a coexistence etiquette) in the blocks 1880-1900 MHz and/or 1910-1920 MHz.

3.2 In view of the availability of cellular mobile services in the country and possibility of Fixed Mobile Convergence (FMC), is there any need to have DECT Phones?

Answer: Yes, there is a need for DECT phones.

3.3 Is there any requirement of allocating spectrum for digital CTS, in view of similar solutions being available in already de-licensed band 2.4 & 5.8 GHz?

Answer: Yes, because in order to guarantee the quality of service for CTS a coexistence etiquette is required, which is not available in the ISM band.

3.4 Whether de-licensing of the spectrum for digital CTS applications will be the right path?

Answer: Yes, de-licensing of the spectrum for digital CTS applications will be the right path to ensure a low cost service for a maximum number of people.

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?

Answer: Yes, the 1880-1900 or 1910-1920 MHz band (TDD Mode) should be allocated for digital CTS applications with a maximum terminal power of 250 mW (24 dBm) and an antenna gain of at least 3 dBi.

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?

Answer: No harmful interference is to be expected. The potential interference cases that will occur in India have already been studied and analysed. The studies and hundreds of millions of DECT installations all over the world confirm good coexistence properties.

3.7 Whether the de-licensing of either 1880-1900 MHz or 1910-1920MHz band for low power CTS applications will result in loss of revenue to the government?

Answer: De-licensing should not result in loss of revenue to the government. DECT is around the world allocated within the guard band between cellular up-links and down-links. These guard bands are very difficult to use for public cellular systems. Using them for low power state of the art CTS to the benefit of the general Indian public will cause indirect revenues to the Indian society.

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

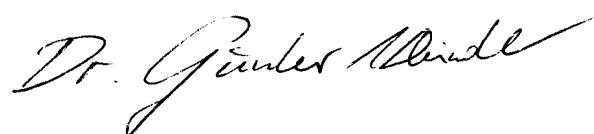
Answer: There will not be a security threat when using DECT, because DECT provides state of the art security features.

3.9 Amongst the various options of digital technologies available to meet the cordless telephony requirements, either spectrum allocation can be considered according to technology or the etiquettes/ specifications can be defined for the de-licensed spectrum band. What method of allocation of spectrum for digital CTS applications should be adopted?

Answer: The most efficient way is to define an appropriate coexistence etiquette and to allow access to the whole spectrum.

3.10 Any other issue?

Answer: none.

A handwritten signature in black ink, reading "Dr. Günter Kleindl". The signature is written in a cursive style with a long, sweeping underline.

Dr. Günter Kleindl

Chairman ETSI TC DECT