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Sent: Wednesday, April 20, 2022 2:01:56 PM
Subject: Response to Consultation Paper for use of Street Furniture

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Respected Sir,
Enclosed please find the response for the consultation paper on " USE OF STREET FURNITURE FOR SMALL CELL AND AERIAL FIBER DEPLOYMENT " as attached.

regards,

For Smartlink Solutions Pvt. Ltd.

Issues for Consultation - Use of Street Furniture.docx
14 KB

TRAI Consultation Paper on "USE OF STREET FURNITURE FOR SMALL CELL AND AERIAL FIBER DEPLOYMENT

ISSUES FOR CONSULTATION

Q.1: Is there a requirement for any modification in existing RoW Rules as notified by DoT to accommodate small cell deployment on street furniture? If yes, please provide the changes required.

YES. Pre-specified Small Cell deployment should be incorporated into existing RoW policy and should be same across the country.

Q.2: Have the amendments issued in 2021 to RoW rules 2016 been able to take care of the needs of aerial fiber deployment? If not, what further amendments can be suggested? Please provide exact text with justification.

NO. This amendments must be brought thru as a parliamentary law, which is applicable to every central/state/local agencies. Even there are interpretation issues in Gazette notification and draft guidelines issued by same department. For overhead OFC cables, there has to only " One Time" charge , not exceeding Rs. 1000/- per kilometre as specified in gazette notification.

Q.3: What are the suggestions of stakeholders for aligning RoW policies issued by various other Central Government Bodies with existing DoT RoW policy?

There need to be three layer committee to be formed with representatives from DoT, Industry experts, and other central PSUs in the field of telecommunication . National level committee will suggest over-all guidelines for RoW permission, charges and other governing rules.

State level committee will co-ordinate with different state agencies, and ensure the implementation at state level. Stake holders from state level players must also be taken on-board to take care of state specific issues.

Local body at SSA level headed by district collector, to take care of single point of contact for roll-out issues.

Q.4: Whether it should be mandated that certain public infrastructure (municipality buildings, post offices, bus, and railway stations, etc.) be earmarked to have dedicated spaces that allow service providers to deploy macro/small cells? If yes, what are the possibilities and under what legal framework this can be done? What should be the terms and conditions of use of such infrastructure? Please provide detailed inputs with justifications.

YES. Legal framework can be best decided by industry experts. For using space ,only for passive infrastructure , maximum possible subsidized rates must be offered to increase the proliferation. For active components, 24 hour power must be arranged at best possible rate.

Q.5: Can some of the street furniture like traffic lights, metro pillars etc be earmarked for mandatory sharing between controlling administrative authority and Telecom Service/Infrastructure providers for deployment of small cells and aerial fiber? Does existing legal framework support such mandating? What should be the terms and conditions of such sharing? Please provide details

YES it has to be mandated. Whatever caanges required in legal framework must be done in time bound manner.

Q.6: How can infrastructure mutualization and infrastructure collaboration be ensured to avoid exclusive rights of way? What legal provisions can support mandating these? Provide full details.

Infrastructure mutualisation should be made mandatory, as it saves lot of duplication of infrastructure, which otherwise can be deployed to cover other un-connected areas. A detail can be worked out in consultation with all stake holders, but it has to happen in time bound manner.

Q.7: Should there be permission exemption for deploying certain categories of small cells at all places or all categories of small cells at certain places (Like apartments etc.)? What legal framework will support such exemptions?

No Comments

Q.8: What should be the criterion/ conditions (like power, height etc.) and administrative procedure for implementing such exemptions? Please provide exact text with detailed justifications

Predefined specification should be allowed to be installed without any permission. For power, uptime report of specified sites , can be taken into consideration, and based on power ratting of device, standard billing procedure can be adopted by DISCOMs.

Q.9: For Small Cells that do not fall under the exemption category, should there be a simplified administrative approval process (like bulk approvals etc.) for deployment? If yes, what should be the suggested process? If not, what should be the alternative approach?

No comments

Q.10: What power related problems are envisaged in deploying small cells on street furniture? Please provide full details.

Getting permission for electricity meter at every street poles is not a viable solution. A common billing for all standard components, with uptime report and average power consumption , or any alternate simplified method need to be worked out in consultation with DISCOMs and telecom/ infrastructure provider companies.

Q.11: What viable solutions are suggested to address these problems? Please provide full details.

Some points are covered in previous answer.

Q.12: Is there a need for standardizing the equipment or installation practices for next generation small cell deployment on street furniture? If yes, what are the suggested standards and what should be the institutional mechanisms for defining, and complying to them?

No comments

Q.13: Is there a need for a specific mechanism for collaboration among local bodies /agencies for deployment of small cells and arialfiber using street furniture? If yes, what mechanisms should be put in place for collaboration among various local bodies/agencies involved in the process of permissions with TSPs/IP1s and to deal with other aspects of Small Cell deployment?

Already covered in answer to Q-3.

Q.14: Kindly suggest an enabling Framework that shall include suggestions about the role of various authorities, rules of coordination among them, compliance rules and responsibilities, approval process, levies of fees/penalties, access rules etc.

No comments

Q.15: How can sharing street furniture for small cell deployment be mandated or incentivized? What operational, regulatory, and licensing related issues are expected to be involved in sharing of small cells through various techniques in the Indian context and what are the suggested measures to deal with the same?

No comments

Q.16: Whether there should be any specific regulatory and legal framework to enable Small Cell and Aerial Cable deployment on

i. Bus Shelters ii. Billboards iii. Electric/Smart Poles iv. Traffic lights v. Any other street furniture

No Comments

Q.17: What should be the commercial arrangements between the TSP's/Infrastructure Providers and street furniture owners for the same?

No Comments