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9th June 2021

To,

Shri Sunil Kumar Singhal,
Advisor, (Broadband & Policy Analysis)
TRAI. New Delhi

Sir,

**Subject:- Comments on Supplementary Consultation Paper on Roadmap to Promote
Broadband Connectivity and Enhanced Broadband Speed**

We are a registered CAG of TRAI covering the state of Karnataka.

We are pleased to enclose our comments/suggestions on the above consultation paper.

Thanking you,
Yours Sincerely

GOPAL RATNAM V
Secretary
Consumer Care Society

Comments on
Supplementary Consultation Paper
on
Roadmap to Promote Broadband Connectivity and
Enhanced Broadband Speed

1. What should be the approach for incentivizing the proliferation of fixed-line broadband networks? Should it be indirect incentives in the form of exemption of license fee on revenues earned from fixed-line broadband services, or direct incentives based on an indisputable metric?

Direct Incentives. Direct incentives are more effective and induce the desired changes in the behavior of the intended target, in this case the Service Providers. Further the incentives should be based on a metric which is clearly measurable and reliable.

Further, as the TRAI's note enumerates the difficulties of monitoring the Indirect incentives in the form of exemption of license fee on revenues, clearly indicates the ineffectiveness of these incentives.

2. If indirect incentives in the form of exemption of license fee on revenues earned from fixed-line broadband services are to be considered then should this license fee exemption be limited to broadband revenue alone or it should be on complete revenue earned from services delivered through fixed-line networks?

Not applicable. As answered in question 1, we feel that direct incentives are the preferred option.

3. In case of converged wireless and fixed-line products or converged services delivered using the fixed-line networks, how to unambiguously arrive at the revenue on which license fee exemption could be claimed by the licensees?

Not applicable. As answered in question 1, we feel that direct incentives are the preferred option.

4. What should be the time period for license fee exemption? Whether this exemption may be gradually reduced or tapered off with each passing year?

Not applicable. As answered in question 1, we feel that direct incentives are the preferred option.

5. Is there a likelihood of misuse by the licensees through misappropriation of revenues due to the proposed exemption of the License Fee on the revenues earned from fixed-line broadband services? If yes, then how to prevent such misuse? From the revenue assurance perspective, what could be the other areas of concern?

Not applicable. As answered in question 1, we feel that direct incentives are the preferred option.

6. How the system to ascertain revenue from fixed-line broadband services needs to be designed to ensure proper verification of operator's revenue from this stream and secure an effective check on the assessment, collection, and proper allocation and accounting of revenue. Further, what measures are required to be put in place to ensure that revenue earned from the other services is not mixed up with revenues earned from fixed-line broadband services in order to claim higher amount of incentive/exemption.

Not applicable. As answered in question 1, we feel that direct incentives are the preferred option.

7. Is there any indisputable metric possible to provide direct incentive for proliferation of fixed-line broadband networks? What would be that indisputable metric? How to ensure that such direct incentives will not be misused by the licensees?

Yes. We agree that the objective is the proliferation of fixed-line broadband network across the country and hence the metric should clearly tracking that.

Metric is the number of new first-time household that are added to the fixed-line broadband network of a service provider. For every such connection the Service Provider would be provided with an direct incentive. The amount of incentive would be the cost of a CPE.

This metric will ensure that only NEW not existing subscribers who are switching from one network to another are measured. Further it is focused on the household rather than a single subscriber. This will ensure that for enrollment of business subscribers , the service provider will not be incentivized. With a database of the broadband connections with a central registry it would possible to monitor and check any misuse.

8. What are key issues and challenges in getting access to public places and street furniture for installation of small cells? Kindly provide the State/ City wise details.

The key issues and challenges are similar to any other, involving multiple governmental agencies at different levels of governance - Local, Municipal and State. Some of them are Lack of policy guidelines, Confused and convoluted procedure, Delays in approvals, Overlapping jurisdiction, Lack of coordination, etc.

9. How to permit use of public places and street furniture for the effective roll out of 5G networks? Kindly suggest a uniform, simple, and efficient process which can be used by States/ Local-Bodies for granting access to public places and street furniture for installing small cells. Kindly justify your comments.

The policy regarding the use of Public places and Street furniture should be fair, transparent and effective. The procedures should be quick, simple and efficient.

As there are multiple agencies and organisations involved it would be better that that the States be nodal authority to formulate policies to ensure that it is uniform across a State. Further to ensure that transparency and swift it would be better for the entire process to online and automated, with the availability and the cost of using a public place and street furniture be listed for anyone to access. The allocation should be also automated with a ceiling on the number of sites in public places or street furniture that is provided to a particular Cellular operator.

10. Which all type of channels of communication should be standardized to establish uniform, transparent, and customer friendly mechanisms for publicizing provisioning of service and registration of demand by Licensees?

Web based channels of communications for the best options to provide a transparent and customer friendly mechanisms for publicizing the provisioning of service and registration of demand by the licensees.

11. Whether proliferation of fixed-line broadband services can be better promoted by providing Direct Benefit Transfer (DBT) to subscribers of fixed-line broadband services? If no, elucidate the reasons.

Yes. Direct Benefit Transfer (DBT) to subscribers of fixed-line broadband services will definitely accelerate the adoption of them.

One of the major causes for the many subscribers not opting for the fixed-line broadband services is the high initial cost including the investment in the CPE (Consumer Premises Equipment) and installation charges. CPE cost are bundled only with a Higher Up-Front payment. This would a constraint for many consumers. The CPE are provided with only a six month warranty and hence the consumer is exposed to the risk of repeated purchases of CPE. Further higher monthly subscription charges at the lowest slab are higher compared to the mobile services. While there is the benefit of higher speed and more data, mobile services are preferred as they have multiple uses and it is location independent.

12. If answer to Q11 is affirmative, then: i. Should DBT scheme be made applicable to all or a particular segment of fixed-line broadband subscribers? Kindly justify your comments. ii. If you recommend supporting a particular segment of fixed-line broadband subscribers, how to identify such segment of the subscribers? iii. How to administer this scheme? iv. What should be the amount of DBT for each connection? v. What should be the period of offer within which individuals need to register their demand with the service providers? vi. What should be the maximum duration of subsidy for each eligible fixed-line broadband connection?

To ALL. All new subscribers. The DBT scheme would be applicable to all broadband subscribers who subscribe to the service post the policy announcement date. Care should be exercised that current subscribers do not cancel and resubscribe to the service to avail the services.

(i) The scheme would be available for all subscribers indefinitely for a minimum speed and data usage that is entry level service. When the subscribers shifts to a higher speed and data usage the DBT scheme will not apply. Thus all subscribers are eligible for the benefit at the entry level service (minimum speed and data usage). This approach will ensure maximum demand potential from an area and will ensure that the Service Provider establish the necessary infrastructure for that area. Also more citizens would be able to access an service which has become indispensable. The monitoring of the scheme becomes easy as there are no exemptions.

(ii) We suggest segmenting the Subscribers on the basis on Old (existing) and New (Prospective) to ensure that the entry barriers are reduced. It is easy to ensure the identification of New subscribers as they would be ones to register for the service after the announcement of the policy.

(iii) To ensure that the existing subscriber do not re-register for a new connection to avail the DBT it would be necessary to cross check with an existing database. Such a database can be established centrally and operated by an independent agency to ensure transparency and effective implementation. Also the offer would be limited to one per household and not per subscriber and hence needs independent verification of location/subscriber.

(iv) The minimum amount would depend on the parameters defining the entry level service. Based on the current market conditions it would be a maximum of Rs. 200 per subscriber for the entry level service. This in our view currently would be 100 Gb of data at 50 Mbps speed. In future these parameters are likely to increase for the same rate or the rate would reduce for the same parameters.

(v) The offer period should be till the time the objectives in the National Telecom policy are achieved, in terms of the number of fixed-line Broadband subscribers.

(vi) The subsidy for the eligible subscribers is for life long. Either the subscribers exists out of the entry level subscriber category due their increase in affordability or necessity. In fact we anticipate the Service Providers would provide incentives to the subscribers to move out of the entry level category to enhance their revenues. Once an entry level subscriber move to the next level of service, they are not eligible for the subsidy. The subsidy is also limited to one per household/location.

13. Any other related issue

No other comments.