

Siti Networks Ltd. response on consultation paper on Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed

Q.1: Should the existing definition of broadband be reviewed? If yes, then what should be the alternate approach to define broadband? Should the definition of broadband be:-

- a. Common or separate for fixed and mobile broadband?
- b. Dependent or independent of speed and/or technology?
- c. Based on download as well as upload threshold speed, or threshold download speed alone is sufficient?
- d. Based on actual speed delivered, or on capability of the underlying medium and technology to deliver the defined threshold speed, as is being done presently?

Please suggest the complete text for revised definition of the broadband along with the threshold download and upload speeds, if required for defining broadband. Kindly provide the reasons and justifications for the same.

ANS: Yes the broadband definition of broadband should be reviewed.

- a) There should be separate definition for fixed line broadband and mobile broadband***
- b) The definition should be dependent on speed***
- c) Download speed should be sufficient. If both download and upload are to be considered, it should be in ratio of 4:1 for DL: UL***

d) Broadband definition should be defined on the basis of speed delivered

“**Mobile Broadband** is a data connection that is able to support interactive services including Internet access and has the capability of the minimum download speed of 512 kbps to an individual subscriber from the point of presence (POP) of the service provider intending to provide **Broadband** service.”

“**Fixed Line Broadband** is a data connection that is able to support interactive services including Internet access and has the capability of the minimum download speed of 10 mbps and is connected on a wired network for Broadband communication to the subscribers”

Q.2: If you believe that the existing definition of broadband should not be reviewed, then also justify your comments.

ANS: As indicated in answer to previous question the definition should be reviewed.

Q.3: Depending on the speed, is there a need to define different categories of broadband? If yes, then kindly suggest the categories along with the reasons and justifications for the same. If no, then also justify your comments...different categories of broadband on the basis of speed is not a right option.

ANS: For the limited time of 2-3 years, there may be different category of Broadband for Tier 1&2 towns Vs Tier 3 & 4 towns.

Another approach could be to have two definition of Broadband – One for Tier 1 & 2 towns and another for Tier 3 & 4 towns. This may be needed considering different availability of Infra and readiness for Tier ½ and Tier ¾ towns. This may also be needed as All Peering and Caching cloud servers are hosted in Tier ½ towns.

For smaller players, Cost of Broadband delivery in Tier 3 and 4 towns is much higher as compared to Tier 1 & 2 towns. This is because P2P Infra

and bandwidth is owned and managed by few bigger Telecom Service Providers only. All smaller players have to take bandwidth on lease from these players only. So cost of BW delivery in Tier 3 & 4 towns is high.

After the agreed time frame, there has to be only one category of Broadband PAN India.

Q.4: Is there a need to introduce the speed measurement program in the country? If yes, please elaborate the methodology to be implemented for measuring the speed of a customer's broadband connection. Please reply with respect to fixed line and mobile broadband separately.

ANS: Speed measurement is currently done via multiple methods like Ookla, Fast.com etc. are more or less giving users the mechanism to monitor speed which is quite satisfactory. So there is no such need.

Q.5: Whether the Indian Telegraph Right of Way (RoW) Rules 2016 have enabled grant of RoW permissions in time at reasonable prices in a non-discriminatory manner? If not, then please suggest further changes required in the Rules to make them more effective.

ANS: ROW Permission and cost are the major hindrance in Infra development for all smaller ISP. Because of this, 80% of Broadband is operational through overhead Fiber. So whether having FTTx or having dual band WiFi routers at customers' premises for high speed Broadband, connectivity is through overhead Infra.

Most of the State Govts, Municipal Bodies and Utilities companies do not have any Policy to give ROW for overhead cables, so 99% of

overhead Infra is operational w/o any ROW permission. All ISPs having overhead Broadband network are on mercy of these authorities. Moreover various state electricity boards are charging exorbitant amount to give permission for overhead cabling which is a major concern in penetration of fixed line broadband in the country. Issue is even bigger in cities where execution of Smart cities Project is in progress. RoW regime should be transparent and affordable and should also have some common ground in order to decide the price.

Q.6: Is there any alternate way to address the issues relating to RoW? If yes, kindly elucidate...

ANS: For growth of Broadband penetration India, there must be a uniform ROW policy for underground and overhead Fiber cables for all ISPs. TRAI/ Govt may study various models for ROW specially for overhead cabling in countries like Thailand, etc.

Q.7: Whether all the appropriate authorities, as defined under the Rules, have reviewed their own procedures and align them with the Rules? If no, then kindly provide the details of such appropriate authorities.

ANS: Presently there is no such rules or policies laid down by the government or authorities. Most Electricity boards are charging exorbitant amount on annual basis for use of poles which keeps on increasing every year by 10% and has already reached to around Rs.1000 per pole. This is practically not possible for any service provider to bear such cost while providing affordable broadband service. For UG cabling despite some efforts from the central government, concerned authorities does not provide the permission in a stipulated time frame at reasonable cost. A common policy should be adopted for PAN India for faster growth of broadband in the country.

Q.8: Whether the RoW disputes under the Rules are getting resolved objectively and in a time-bound manner? If not, then kindly suggest further changes required in the Rules to make them more effective.

ANS: Central Government should set the process for obtaining permission and further guidelines for security and restoration charges etc. to enable the service providers to build the required infrastructure at a faster pace for speedy penetration of broadband services in the country. There should be a centralized system for infrastructure development and this should not be left on the mercy of area specific local authorities. The idea of common duct and common overhead 48 fiber is also an option which can be used by various service providers as per requirement.

Q.9: What could be the most appropriate collaborative institutional mechanism between Centre, States, and Local Bodies for common Rights of Way, standardisation of costs and timelines, and removal of barriers to approvals? Justify your comments with reasoning.

ANS: The average cost should be defined on the basis of distance to be covered which can be different for Metro/Urban/Rural areas and also different for special cases like Railway Crossing, Smart Cities, Highway crossing etc. This work should not be left to the local authorities to ensure timely permissions and standardized cost.

Q.10: Should this be a standing coordination-committee at Licensed Service Area (LSA) level to address the common issues relating to RoW permissions? If yes, then what should be the composition and terms of reference of this committee? Justify your comments with reasons.

ANS: Yes. This is infact a good idea to form a standard committee which can be at a LSA level and the Area DM/SDM/Heads of Municipal Committees should be necessarily part of such committee.

Q.11: Is there a need to develop common ducts along the roads and streets for laying OFC? If yes, then justify your comments.

ANS: Yes. This will help the service providers and the government authorities and minimize the time, cost and efforts of all concerned.

Q.12: How the development of common ducts infrastructure by private sector entities for laying OFC can be encouraged? Justify your comments with reasoning.

ANS: Common duct is an infrastructure requirement and a national network should be developed like any other basic utility like Road, Railway, Electricity & Water distribution network.

Q.13: Is there a need to specify particular model for development of common ducts infrastructure or it should be left to the landowning agencies? Should exclusive rights for the construction of common ducts be considered? Justify your comments with reasoning.

ANS: Common duct is essential requirement of modern times and it can not be left to develop on its own without any national roadmap. There should be a national policy for development of common duct which should be part of a basic amenity infrastructure.

Q.14: How to ensure that while compensating the land-owning agencies optimally for RoW permissions, the duct implementing agency does not take advantage of the exclusivity? Justify your comments with reasoning.

ANS: as explained above, this is an essential requirement and any agency or authority responsible for development of this infrastructure should be assigned the task to properly study all the aspects related to such infrastructure keeping in mind the future requirement. At the same time this has to be available to the service providers at affordable cost to ensure growth of the services.

Q.22: Even though fixed broadband services are more reliable and capable of delivering higher speeds, why its subscription rate is so poor in India?

ANS: Fixed line services are CAPAX intensive as provider needs to invest lots of fund in providing the services in the ground networking and also at the subscriber end so availability is very limited so is the subscription.

Q.23: What could be the factors attributable to the slower growth of FTTH subscribers in India? What policy measures should be taken to improve availability and affordability of fixed broadband services? Justify your comments.

ANS: Absence of local supply chain is the bottleneck in FTTH growth in the country. Government should take the initiative in developing a robust supply chain in the country in order to facilitate local production to ensure sufficient inventory.

Q.24: What is holding back Local Cable Operators (LCOs) from providing broadband services? Please suggest the policy and regulatory measures that could facilitate use of existing HFC networks for delivery of fixed broadband services.

ANS: AGR issue is still not addressed by the government. The AGR should be abolished for fast growth of the fixed line broadband in the country.

Q.27: Is there a need of any policy or regulatory intervention by way of mandating certain checks relating to contention ratio, latency, and bandwidth utilisation in the core network? If yes, please suggest the details. If no, then specify the reasons and other ways to increase the performance of the core networks.

Q.28: Should it be mandated for TSPs and ISPs to declare, actual contention ratio, latency, and bandwidth utilisation achieved in their

core networks during the previous month, while to their customers while communicating with them or offering tariff plans? If no, state the reasons.

ANS 27& 28: It has been witnessed that any such policy remain forceable to the big operators only and small operators remain unaffected of such requirements. While designing any such formats it should be made mandatory for all the service providers to ensure transparency and level playing field to all the players.

Q.32: Is there a need of any policy or regulatory intervention by way of mandating certain checks relating to consumer devices? If yes, then please suggest such checks. If no, then please state the reasons.

ANS: The Authority should define the standards for consumer devices to ensure minimum quality standards of the products and minimize consumer complaints arising out of inferior quality devices.

Q.33: To improve the consumer experience, should minimum standards for consumer devices available in the open market be specified? Will any such policy or regulatory intervention have potential of affecting affordability or accessibility or both for consumers? Please justify your comments.

ANS: The procurement of consumer device should be left on the open market forces as the consumer can purchase their devices of their choice and requirement.