

TEMPLATE FOR COMMENTS ON TRAI CONSULTATION PAPER NO. 9/2011

“Allocation of Spectrum Resources for Residential and Enterprise Intra-telecommunication Requirements/ Cordless Telecommunication Systems (CTS)”.

THE CENTRE FOR INTERNET AND SOCIETY RESPONSE

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?

To meet the demand of cordless telephony spectrum requirements the government should de-license the 1880-1900 band for CTS applications.

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?

Yes, there is a need for DECT phones in India. DECT technology provides good voice quality and very high radio link reliability. There are specific advantages and applications that only DECT technology can provide. DECT systems cover the entire living area, including the basement, by providing single cell systems. DECT systems can also be used with full security and without interference for multiple co-located installations with no radio planning or licensing requirements. Moreover, DECT offers local messaging/broadcast and control functions for private space equipment.

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?

There is a requirement for the allocation of spectrum for digital CTS, because the application specific allocation of spectrum for digital CTS devices ensures the efficient sharing of spectrum with little interference concerns, as the users of the spectrum must comply with particular guidelines such as dynamic channel selection procedures, power levels etc. Furthermore, it would be difficult to maintain a good quality of services if the CTS devices must compete for space and face interference concerns with various ISM band devices operating in the 2.4 & 5.8 GHz bands.

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

Yes, the de-licensing of the spectrum for digital CTS applications is the right path as per international best practices. Frequencies for digital CTS devices have been de-licensed in Europe and US. De-licensing spectrum for digital CTS applications would enable easier market entry, innovation, and market expansion, as has been shown by the innovation and market expansion in Wi-Fi technology that occurred as a result of the de-licensing of the 2.4 and 5 GHz ISM bands.

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?

No comments

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?

DECT devices are used in over 100 countries worldwide for domestic, business, industrial, and wireless local loop applications. About 60% of the cordless communication world market is controlled by this technology. Examples of all these countries demonstrate that DECT systems can co-exist with cellular systems in the 1880-1900 MHz and 1910-1920 MHz bands. Furthermore, studies conducted by the European Conference of Postal and Telecommunications Administrations (CEPT) found that the 3G technology in the adjacent band does not get interference from low power indoor usage of cordless telephony.

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

No comments

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

No comments

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 24 etiquettes/ specifications can be defined for the de-licensed spectrum band. What method of allocation of spectrum for digital CTS applications should be adopted?

No comments