

From: randhir verma <ctsaregd@yahoo.co.in>
To: "cp@traf.gov.in" <cp@traf.gov.in>
Sent: Monday, 30 January 2012 10:37 PM
Subject: our comments on dect technology

Sir,

Please find enclosed our comments on DECT technology-TRAI consultation paper.

Regards,

Yours faithfully,
FOR CHANDIGARH TELECOM DIST. TELEPHONE SUBSCRIBERS ASSN.,

R.K. VERMA

PRESIDENT
MOB 9878739988
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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: Allocated spectrum for CTS in the 1880-1900Mhz band for digital CTS are sufficient for the immediate needs of residential consumers in India.

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: Pico cell based cellular technology has not been offered to residential consumers in India by any operator in India. It is also doubtful whether the FMC technology could cater to the very large co-located residential needs without getting into interference problems. It also cannot offer the very high quality of voice that DECT systems offer and ease with which they can be bought from the open market and installed by residential consumers without the need for radio planning etc.

प्रधान सलाहकार (एम.एस.)
डायरी सं. 064
दिनांक 31/1/12

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: We understand that the quality of in-house voice service offered by DECT is much superior to WiFi based systems. We also understand that with the increased use of WiFi based equipment in the houses & offices there are interference issues with the WiFi cordless. We would prefer using the WiFi band exclusively for data broadband and having a separate band allocation for voice service. A choice of such a segregation would be best for consumers in India.

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

Answer: Yes – ABSOLUTELY ESSENTIAL IN CONSUMER INTEREST.
Consumers in India would only go in for a CTS technology which they can buy from the open market and use easily without any lengthy licensing issues. Consumers in India are same as global consumers and if this technology is available as a open market de-licensed technology to global consumers there is no justification in Govt. of India keeping the technology under a license regime.

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: The 1880-1900MHz band is already allocated for digital CTS technology(TDD Mode) vide NFAP-2011. However, for reasons best known to WPC it has been kept under a license regime, thus making it completely un-attractive as a usable technology for consumers in India.

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: DECT systems are being used all over the world where cellular networks both GSM & CDMA are working. We have not heard of any interference issues with the cellular network & handsets.

