

“ALLOCATION OF SPECTRUM RESOURCES FOR RESIDENTIAL AND ENTERPRISE INTRA-TELECOMMUNICATION REQUIREMENTS/ CORDLESS TELECOMMUNICATION SYSTEMS (CTS)”.

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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: The current allocation of spectrum for CTS in the ISM(WiFi) band and the 1880-1900Mhz band for digital CTS as indicated under para 2 of the Consultation Paper, is sufficient for existing needs. However, while the ISM(WiFi) band, which is suitable for data but not very appropriate for voice, is de-licensed, the 1880-1900Mhz band which is most suitable for voice is a licensed band. This has only lead to consumers in India not being able take advantage of the current available digital CTS technologies to create wireless/mobile private spaces in homes and offices. Digital CTS technology for residential and office use cannot work on a case by case license basis as the equipment is bought from the open market and installed by users without the need of any technical help. All over the world state of the art digital CTS works in a de-licensed spectrum.

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: Yes there is a need for DECT phones/digital CTS technology. In fact, both have their own areas of usefulness to consumers. FMC or pico/nano cell based cellular technology is well suited for very large establishments/very large private spaces which can be offered this service by the local cellular service provider. Alternatively cellular service licensees can offer closed user group facilities. Digital CTS/DECT is more useful for residential/SOHO and small enterprise needs. Furthermore it also avoids revenue outflow for intercom calls. Even in very large private spaces where there is a need for real time control and very reliable messaging between man and machine or machine to machine, DECT with its low bit rate messaging/data service offers a better solution.

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: As mentioned in section 2.8.6 of the Consultation Paper DECT and Wi-Fi are complementary technologies. Due to the well known interference caused to 2.4GHz & 5.8GHz cordless equipment by WiFi equipment such as Bluetooth, microwave oven, broadband data equipment, its use all over the world is coming down. The ISM/WiFi bands are now being exclusively used only for broadband data purpose (largely for internet access and internet based services) while users are shifting to the digital CTS bands – 1880-1900MHz or 1910-1920MHz for voice and low bit rate real time control and messaging applications within the private space. In coming years with a wider use of WiFi for internet/broadband services in India, this trend will become apparent in India also. It is obvious that India needs a 1880-1900MHz de-licensed spectrum to provide state of the art residential and enterprise mission critical voice and medium rate data services for its consumers.

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

Answer: Yes – IT WILL BE THE RIGHT PATH for reasons already explained at 3.1 to 3.3 above. The earlier analog CTS band was de-licensed. The recent WiFi band, both in the 2.4GHz & 5.8GHz bands is de-licensed for voice & data applications. There is therefore no justification for retaining the digital CTS band as a licensed band. As indicated in Chapter I of this Paper, de-licensing is the only globally accepted norm for private space digital CTS application. A licensing procedure cannot be practically implemented for residential and SOHO applications. This is more so as the terminals are purchased directly from the market and installed by users without any technical help.

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 (TDD mode) is already allocated for digital CTS. As argued above, it needs to be de-licensed. It is best to follow the European Standards for the specifications of the equipment as the 1880-1900MHz band is used for digital cordless in Europe. Terminal power (conducted): 250 mW (24 dBm) Antenna gain: < 12 dBi.

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: As detailed at 2.8.3 of the Consultation Paper there are number of studies done on the subject which clearly indicate that there are no interference issues with the cellular network. Millions of digital CTS systems in the 1880-1900MHz band are working all over Europe, Australia and many more countries where DECT systems are allowed in this band for un-licensed use and there have been no reports of interference problems.

3.7 Whether the de-licensing of either 1880-1900 MHz or 1910-1920MHz band for low power CTS applications will result in loss of revenue to the government? Answer: Loss of revenue applies for spectrum sale to licensed service providers for commercial exploitation. It does not apply for digital CTS band spectrum. It cannot be made applicable to equipment which is openly sold in the market. For the digital CTS band the method of earning

revenue is by levy of taxes either at the time of manufacture or sale of equipment. The earlier CTS bands as well as the WiFi band are all de-licensed. It therefore stands to reason that this band should also be de-licensed. The Govt could perhaps go in for some form of license fee applicable on the user of all wireless handsets in the de-licensed bands on a per wireless handset basis which could be applicable at the time of purchase or on an annual basis. Any such license fee cannot be made applicable to only one type of digital cordless equipment sold in the market. It would be needed to be applied to all types of digital cordless handsets available in the market including WiFi sets. The concept of "case by case license" by filing applications with WPC for each residential or enterprise installation is not practical and will only lead to discouraging people from using wireless handsets, increase black market sets and corruption and discourage indigenous manufacture.

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

Answer: As has been adequately answered under para 2.8.5 of the Consultation paper CTS is using the public PSTN network just like wired phones. From security point of view there is no difference. Any further security protocol to be built into equipment to be used within residential & enterprise private space could be legally challenged.

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

Answer: A defined etiquette based CTS is a better option. Etiquette parameters have already been defined by WPC in its Note 57 to the NFAP-2011 and in the Consultation Paper. 3.10 Any other issue? Answer: NIL

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