



To,
Advisor (NSL)
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg, (Minto Road),
New Delhi-110002

No. Regln/1-33/2014/

Dated: 29th Oct, 2014

{Kind attention: Sri. Arvind Kumar}

Sir,

Subject: - Comments of BSNL on consultation paper on “Delivering broadband Quickly: what do we need to do?”

Kindly refer to this office Consultation paper no. 12/2014 on the subject mentioned above. In this context, BSNL’s reply is as follows

S.N.	Point of consultation	BSNL’s Reply
1	Q3. The recommendations of the Authority on Microwave backhaul have been recently released. Are there any other issues which need to be addressed to ensure availability of sufficient Microwave backhaul capacity for the growth of broadband in the country?	<ul style="list-style-type: none"> a. The spectrum charges prescribed for MWA carrier are Rs 13,900/- per annum per carrier. The charges are too high, and may be brought down further. b. In some cases frequency diversity is required, in addition to space diversity, for setting up microwave back bone links. Therefore, spectrum charges for (1+1) and (N+1) carrier of 28 Mhz for BWA/ MWA may also be prescribed. c. The recommendation dated 29-08-2014 given by TRAI on MWA and MWB may be implemented by DoT after incorporating above changes.
2	Q4. The pricing of Domestic Leased Circuits (DLC) have been reviewed in July 2014. Apart from pricing, are there any other issues which can improve availability of DLC?	Apart from pricing, availability of DLC depends on availability of network.
3	Q5. What are the specific reasons that ISPs are proactively not connecting with NIXI? What measures are required so that all ISPs are connected to the NIXI?	<ul style="list-style-type: none"> a. The connectivity to NIXI is not economically attractive to many of the ISPs. b. Additionally, the peering arrangement between the bigger ISPs already exists and the smaller ISPs get connected to other network through bigger ISPs.
4	Q6. Would the hosting of content within the country help in reduction of the cost of broadband to a subscriber? If yes, what measures are required to encourage content service providers to host content in the data centre situated within India?	<ul style="list-style-type: none"> a. The hosting of content within the country will not only help in reducing the cost of broadband but at the same time will ensure better quality of services and reduction in access delay. b. Incentivization by the government for establishment of the data centre infrastructure and measures to reduce the operation cost of data centre will help hosting of the content in India. c. Local content is practically non-existent today in India. A drive to develop local content and to host it in India is also needed.
5	Q7. Are PSUs ideal choices for	No comments

	implementing the National Optical Fibre Network (NOFN) project?	
6	Q8. Should awarding of EPC turnkey contracts to private sector parties through International Competitive Bidding (ICB) be considered for the NOFN project?	No comments
7	Q9. Are there any ways in which infrastructure development costs can be reduced? Is it possible to piggyback on the existing private sector access networks so as to minimize costs in reaching remote rural locations?	No comments
8	Q10. What can the private sector do to reduce delivery costs? Please provide specific examples.	Not Applicable to BSNL
9	Q11. What are the major issues in obtaining right of way for laying optical fibre? What are the applicable charges/constraints imposed by various bodies who grant permission of right of way? In your opinion what is the feasible solution?	<p>Normally, ROW permissions are to be obtained from NHAI/PWD/Forest/Road Development Corporation of the State/Nagar Nigam/Nagar Palika etc. The main issue is that every agency is having different formats for granting ROW permission and their charges are also different.</p> <p>Particularly in the state of Maharashtra, the Department of IT is asking for entering into an agreement for granting ROW. 2 MB band width is to be provided to Maharashtra free of cost which is causing great difficulties. Further, the time period for granting such permission is not fixed and therefore sometimes the works are badly delayed due to ROW permission.</p> <p>Suggestion: It will be better if every State government is having a Nodal Agency for granting such permission from all the concerned authorities within a specific time period. However, it is to brought to your kind notice that the Ministry of Road Transport and Highways, Governemnt of India has issued guidelines vide letter No:RW/NH-33044/ 27/2005 S&R (R)(Pt) dated 06.08.2013 which are not being implemented/followed particularly by the Govt. of Maharashtra. If these guidelines are followed, it will be great relief in the matter.</p> <p>1. The major issues in obtaining ROW for laying OFC:</p> <p>i) The road authorities, specially the State road authorities, are reluctant in providing RoW for OFC laying for the fear of damage to the road. At times, the roads do not have space on the sides for OFC laying.</p> <p>ii) The process involved in getting ROW permission from State road authorities is cumbersome.</p> <p>iii) The state road authorities insist on deposit of</p>

		<p>huge amount/Performance Bank Guarantee (PBG) in advance in the name of Charges for restoration of probable damage to the road before issuing permission for laying OFC.</p> <p>iv) The estimated amounts for such charges vary depending on road authorities concerned and type of soil etc and there is no fixed rate for the same. However, for NHAI roads, the Bank Guarantee claimed is at a fixed rate of Rs 100/- per meter.</p> <p>Feasible solutions:</p> <p>i) RoW cases may be taken up for issue of a detailed policy guideline so that State road authorities respond to BSNL requests within reasonable time.</p> <p>ii) The OFC laying may be allowed free of cost by Road authorities without any PBG (as BSNL is also a PSU only, so a Government body seeking security money from other Government body may be avoided).</p> <p>iii) A flat rate per meter may be fixed for PBG in case of state roads, if required. Since the roads are mostly in rural areas the rate should be around Rs 50/- per meter.</p> <p>The applicable charges are enclosed as Annexure – 1</p>
10	Q12. Should the Government consider framing guidelines to mandate compulsory deployment of duct space for fibre/ telecommunications cables and space for telecommunication towers in all major physical infrastructure construction projects such as building or upgrading highways, inner-city metros, railways or sewer networks?	<p>a) Yes the Government must consider framing of guidelines for deployment of ducts along National Highways and States Highways. In the first stage, dedicated corridor for laying OFC cable / duct is to be de-marketed along all NH / SH and other major roads.</p> <p>b) Provision of OPGW may be kept along electrical transmission lines in North East region and Himalayan States.</p>
11	Q13. What are the impediments to the provision of Broadband by Cable operators? Please suggest measures (including policy changes) to be taken for promoting broadband through the cable network.	No comments
12	Q17. How much spectrum will be required in the immediate future and in the long term to meet the target of broadband penetration? What initiatives are required to make available the required spectrum?	WiMax was allotted 20 Mhz spectrum in 2.5Ghz band (2635 Mhz- 2655 Mhz). No additional spectrum is required to meet the target for WiMax connections in 2014-15 & coming years.
13	Q18. Are there any other	No comments

	spectrum bands apart from the ones mentioned in Chapter-2 to be identified for provision of wireless broadband services?	
14	Q19. What are the measures required to encourage Government agencies to surrender spectrum occupied by them in IMT bands?	No comments
15	Q20. What should be the time frame for auctioning the spectrum in 700 MHz band?	No comments

For Q1, 2,14,15,16, we would be sending the information very shortly. Delay in submission of BSNL's reply is deeply regretted please.

Encls: Annexure-1

Raghuvir Singh
AGM (Regulation-II)