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भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

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

{Kind attention: Sh. Sanjeev Banzal, Advisor (NSL-II)}

No: RegIn/1-43/2016/1361 dated: 6-07-2016

Sir,
Sub:- Comments of BSNL on TRAI's consultation paper on "In-Building Access by Telecom Service Providers"

Kindly refer to the Consultation paper no.10/2016 on "In-Building Access by Telecom Service Providers". In this regard the BSNL's comments are as follows:-

Question 1. Do you agree that there is a need to address the issues discussed in this consultation paper or the market is capable of taking care of these issues without having any policy intervention/guidelines in this regard?

BSNL Comments: Yes, it is very much needed to address the issue. Present market practices are not much capable to cater the need of growing voice & data services, hence there must be some national policy/ guidelines to share the common infrastructure like IBS etc. for seamless coverage, uninterrupted better quality of telecommunication services. Sharing of IBS infra will also reduce CAPEX, OPEX, and radiation and also enable quicker roll out of services which is very much essential to provide affordable services to mass population of the country.

Question 2. How can sharing of telecom infrastructure inside a residential or commercial complex/airport/hotels/multiplexes etc. among service providers be encouraged? Should the sharing of such telecom infrastructure be made mandatory?

BSNL Comments: At present Infrastructure Provider (IP) or Telecom Service Provider (TSP) obtain right to install and operate its IBS inside a residential or commercial complex/ airport/ hotels/ multiples etc from the property owner. Sharing of such IBS infra is solely dependent on the will & wish of IP/ TSP and it becomes monopoly. Therefore, to overcome this situation, it is very much essential to make the sharing mandatory.

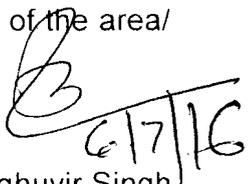
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Question 3. In view of the international practices given in para 18-23 of Chapter-II of the Consultation Paper, what provisions should be included in the National Building Code of India to facilitate unhindered access for all the TSPs?

BSNL Comments: The provisions made in the building code of other countries like Singapore, Honkong and Europe as mentioned in para 18-23, Chapter-II (International Practices) of Consultation paper, may be included in the National Building Code of India suitable in accordance with policy in this regard to facilitate unhindered access from / for all the TSPs.

Question 4. Any other option, which in your view, could resolve the issues discussed in this consultation paper?

BSNL Comments: To incorporate above provisions in the building code, the stake holders like Ministry of Urban Development, Local Authorities etc. may be involved and license fee/ permission etc. may be regulated. There should be a cap on the rental to be charged by property owner like Mall/ Hotel/ Airport/ Commercial Complex etc. The rent of IBS space in such buildings may be regulated based on circle rate of the area/ locality with yearly escalation.


6/17/16
Raghuvir Singh
AGM (RegIn-II)