

Consultation Paper No. 10/2016 dated 6<sup>th</sup> June 2016

**Consultation Paper on In-Building Access by Telecom Service Providers**

- 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?**

**Response:**

We agree there is need to address the issues discussed in the consultation paper. However we would like to state that there are various issues requiring coordination with local municipal authorities and prevailing building byelaws etc. They do not fall within TRAI ambit and would need coordination with other agencies and ministries.

- 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?**

**Response:**

We need to consider the infrastructure in two stages

**Stage1: Access to the Buildings. *Building here means occupied by Multiple Tenants, Residential, Commercial or a mix of both.***

Access permission to TSP (TSP here means both Access and Internet Service Providers and IP1 as well) cannot be denied and it should be mandatory upon building owners/building management societies/ Resident Welfare Societies etc. to allow the access of Licensed Telecom Service providers. There should be no charge for the permission of access. Further such access permission cannot be exclusive. If any restoration is required while laying the network, this should be done by TSP. In case the restoration is done by building owner, TSPs can be charged to the extent of actual cost incurred by the building owner.

There would be need to take some space in the building to keep the Access equipment.

Rental charges per sq ft. for such space should not be more than 25% of general rent per sqft. Further, there should be upper cap of Rs 50 per sqft per month. Electricity charges would need to be paid by TSP.

**Stage2: Network extension and distribution within the building**

There should no mandation on any TSP to share the network laid by TSP with other TSP. Unrestricted Network sharing should be allowed among TSPs. TSPs should have full freedom to share on mutually agreeable terms.

**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?**

**Response:**

Citycom have fully participated in BIS NBC meetings and gave recommendations to BIS for incorporation in building code.

Government should frame guidelines to mandate compulsory deployment of duct space for fibre/telecommunications cables and space for telecommunication towers in all new buildings starting from multiple entries to the building (for redundancy) till a designated meet me common distribution space in the building. Such place would become the start of distribution in the building.

Neutrally Shared In-Building Solutions (IBS) is the perfect solution to address the challenges posed by ever growing mobile traffic inside the buildings.

With neutral IBS, all Mobile Service Providers (providing services in multiple frequencies and technologies) can utilize the same efficient antenna system, eliminating the need for multiple unsightly antennas distributed across a building. DAS protects the ambience and aesthetics of the property because multiple wiring projects are not required. Changing service providers does not lead to the defacement of property because no change to the wiring is necessary. Service providers can simply “plug-in” and services are up and running immediately

