

OTHER SERVICE PROVIDERS ASSOCIATION OF INDIA

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S.V. RAMANA
President

SANJAY DIWAN
Vice President

SANJAY PRASAD
Vice President

P. V. RAMADAS
Treasurer

N. L. VERMA
Secretary General

Date : 30th January, 2012

To
Shri Sudhir Gupta, Pr. Advisor (MS)
Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan
JawaharLal Nehru Marg (Old Minto Road)
New Delhi-110002

Subject: Comments on TRAI Consultation Paper No. 9/2011

Dear Sir,

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

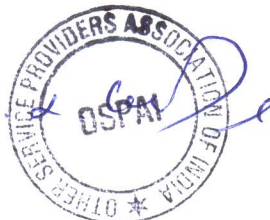
About OSPFI:

Other Service Providers Association of India "OSPFI" - launched for resolving issues pertaining to BPOs/KPOs/ITeS/ Call Centres Domestic & International on pan-India basis and Networking Operating Centres. It is an Association to work together to facilitate the overall development of OSP Industry through a collective organization. The Association charter is to lead an interface with the various ministries of Government of India and other Industry forums with an objective to contribute towards faster growth by overcoming challenges. We are glad to note the synergy in our approach to enhance India's competitiveness & attractiveness in the IT & ITeS industry based on lower costs & advantages on Regulatory front to work Government-Industry partnership to help increase the competitiveness for India.

OSPFI views on Consultation Paper - 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: The current allocated spectrum for CTS in the 1880-1900Mhz band for digital CTS as indicated under para 2 of the Consultation Paper, is sufficient for existing needs. However, the band needs to be de-licensed as in the case of 2.4GHz CTS. Call Centres all over the world use DECT headsets for bringing in mobility and efficiency to their working due to its very heavy traffic carrying capacity and very clear voice performance with no interference. However, this technology is denied to the Indian Call Centres due to the licensing conditions prevalent here.



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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: First of all pico cell based cellular technology has not been offered by any operator in India to OSPFI Call Centre members. It is also doubtful whether the FMC technology could cater to the very heavy traffic density in Call Centres and its need for very clear voice performance. We are also not aware whether any global Call Centre operator is using pico cell cellular technology.

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: WiFi based headsets are not very useful to us due to interference issues (leading to call dropping) with the WiFi LAN & Bluetooth devices working in our Call Centres. Secondly the voice quality is not as good as DECT.

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

Answer: Yes – ABSOLUTELY ESSENTIAL if we are to buy them from the open market and use them easily without any lengthy licensing issues. All over the world Call Centres are able to do this due to the operational spectrum band being unlicensed.

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 band of 1880-1900MHz is already allocated vide NFAP-2011 as indicated in the Consultation paper. However, it needs to be de-licensed for effective use of digital CTS technology.

Standard specifications prevalent in Europe / USA / ITU IMT2000 may be used for the purpose.

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: Call Centres all over the world are using DECT sets. We have not heard of any interference issues with the cellular network & handsets.

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: In India the earlier analog CTS as well as 2.4GHz cordless technology was allowed on a de-licensed basis in public interest. It would be expected that all the technologies should obey a uniform policy. We have also not heard of any country where CTS



technology is licensed for earning revenue for Govt. Perhaps Govt. could consider earning the revenue through standard sales tax etc route rather than licensing every installation of digital CTS. This will encourage the users to easily buy the products from the market with no licensing procedures and indirectly earn revenue for the Govt in the form of sales tax etc.

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

Answer: We do not understand the concern here. DECT systems are connected to our PABX just like wireline phones/ headgear sets etc.

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: TRAI is requested to ensure that whatever technology is approved for use in the digital CTS band must offer very high traffic handling capacity of the type prevalent in Indian large Call Centres and that the headgear sets of the technology should be very low power/ have very low radio emissions/ have very good voice performance/ and have very little interference issues between Call Centre operators sitting close to each other.

3.10 Any other issue?

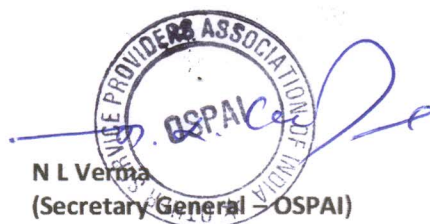
Answer: NIL

These are OSPAI's view on allocation of spectrum resources for residential and enterprise intra-telecommunication requirements/cordless telecommunication systems (CTS).

Thanking you

Yours faithfully

For **Other Service Providers Association of India**



N L Verma
(Secretary General - OSPAI)

Tel: 0120 2779724

Mob: + 91 9811733777: Email: naranjanverma2005@gmail.com

Other Service Providers Association of India (OSPAI)
B-10-11, Chanakya Complex
Subhash Chowk, Laxmi Nagar, Delhi-110 092