

## Comments to Trai Consultation Paper on approach towards sustainable telecommunications

---

Dear Sir,

We submit our comments to the section **Renewable Energy targets for Telecom networks** as below

Point no. 3.10

Trai may encourage TSPs to provide electricity generated from their RET like solar and wind for community purposes as well. It could be used for providing power to lighten a two bulbs and a fan to community toilet, aaganwadi, dispensary, Skill Development Training, Rural ATMs etc. If they provide power for community purpose then that portion may be subtracted from overall carbon emission.

Point no. 3.11

Whether RET project is funded or maintained by other agency does not matter as the carbon emission is in all cases is getting reduced but the TSPs should be responsible for carbon emission targets. They should not pass it on to the other agencies and should submit their report to Trai not citing other agency for any flaws or responsibilities.

Point no. 3.12

The DOT Committee should encourage TSPs to adopt an approach that results in acceptance to the idea of reducing diesel consumption. In rural areas taking along with village folks is very crucial in scaling the RET deployment. TSPs should show their RET assets duly signed by their assigned Officers. A template can be prepared covering various requirement. The approach suggested by DOT committee is right and a welcome step.

Point no. 3.13

The Industry could be described as R & D status which will get them certain exemptions that will lower their costs. Offering incentives to TSPs is justifiable only to those telecom tower sites that have very less or nil diesel consumptions. The thrust should be in Rural India. Each TSPs should commit RET for 20% of their rural sites in the first year and follow the run up for five years. For urban or semi urban or where power is available for 8 hours or more, RET should be made mandatory. Green Telecom Towers awards may be initiated. Empanelment of tested RET solutions and suppliers may be provided which financial support from Clean Energy Fund etc,

Point no. 3.14

The methodology suggested is that TSPs list out 10% of their tower sites for replacing diesel hours to RET hours. They should adopt MNRE mini grid policy (Draft policy ready) and generate power from Distributed Renewable Energy. They should generate renewable energy at their site and consumer there itself. The RETs specially small

wind can be deployed on their existing towers with no modifications, this should be the starting point as does not require additional space, it easy and feasible in windy sites in Tamil Nadu, Kerala, Telangana, AP, Karnataka, Maharashtra, Gujarat, Odissa, J & K, Rajasthan, Chhatisgarh, Madhya Pradesh & NEast. They can deploy single solution or cluster solution based on their tower sites dynamics. MNRE has a small wind policy where they offer INR One Lac per KW similar subsidy can be clubbed from other federal funds.

They should set up a target of 06 months to submit to DOT their comprehensive plan for converting their DG to Renewable Energy Generators. An EOI may be quickly released in press for evaluation of RETs for Telecom Towers for 2 KW, 5 KW, 10 KW, 30 KW & 50 KW loads. All this effort should be done by DOT Committee and involving TSPs in the steering committee will have influence of Big TSP who for their own reasons would try to pull back the initiative. Green Telecom Policy should be treated as a federal directive with certain penalties only then the TSP would become serious.

We would be willing to be a stake holder in the fabulous Green Telecom initiative which is in ICU for long. Our contact details.

Alex Daniel  
Head India & South Asia  
Tiger Power  
[www.tigerpower.eu](http://www.tigerpower.eu)  
[a.daniel@tigerpower.eu](mailto:a.daniel@tigerpower.eu)  
# +91 9871223062  
604, Plot No. 7 Sector 22  
Dwarka  
New Delhi 110 075

Regards,  
**Alex Daniel**  
Head of India & South Asia

***Do you want to be a part of the 4th Industrial Revolution? Part of a movement that will ensure the world gets powered by Renewables?***

***# 604, Plot No. 7, Sector 22, Dwarka***

***New Delhi 110077. India***

***E [a.daniel@tigerpower.eu](mailto:a.daniel@tigerpower.eu)***

***T 011 491241621 - M +91(0)9871 22 3062 – skype ID alex.daniel3062***