

“Allocation of Spectrum Resources for Residential and Enterprise Intra-telecommunication Requirements/ Cordless Telecommunication Systems (CTS)”.

Background of TRAI:

The Telecom Regulatory Authority of India (TRAI) was, established with effect from 20th February 1997 by an Act of Parliament, to regulate telecom services, including fixation/revision of tariffs

<http://www.trai.gov.in/Default.asp>

TRAI's mission is to create and nurture conditions for growth of telecommunications in the country in manner and at a pace, which will enable India to play a leading role in emerging global information society. One of the main objectives of TRAI is to provide a fair and transparent policy environment, which promotes a level playing field and facilitates fair competition. In pursuance of above objective TRAI has issued from time to time a large number of regulations, orders and directives to deal with issues coming before it and provided the required direction to the evolution of Indian telecom market from a Government owned monopoly to a multi operator multi service open competitive market. The directions, orders and regulations issued cover a wide range of subjects including tariff, interconnection and quality of service as well as governance of the Authority.

The working Consultative procedure of TRAI is as follows :

- (a) Take up telecom subjects of current interest and to prepare “Consultation Paper” similar to the one we are considering here, taking inputs from the experts or Association
- (b) The Consultation paper is put on its website for all interested parties to respond in terms of their comments, within a fixed period of time. Comments are to be sent to TRAI through email or by submitting a hard copy
- (c) At the end of the period for comments, these are compiled and then placed on the website for counter-comments from all the stake holders, within a specified period.
- (d) At the end of this period, the TRAI can call for discussion among the interested parties. However, this is not mandatory.
- (e) As a last step TRAI holds Open House Discussion inviting all the stake holders at a public place and discuss the questions once again.
- (f) TRAI compiles all the comments/counter-comments received and the discussions held and formulate its final recommendation on the subject.
- (g) These final recommendations are put on its website and sent to the Department of Telecommunications/Ministry of Telecommunications for necessary action.

This whole process takes about four months.

After reading the TRAI paper you will appreciate that it is well researched.

Guide for using this template:

1. The template is just a help for you to provide Comments to the TRAI Consultation Paper No. 9/2011. You may use the template for information and preparing your own responses.
2. You shall provide your comments/answers, in "PDF" format, and send directly to TRAI by e-mail, as indicated in the template.
3. It is very important that as many companies as possible make positive comments on the need for a de-licensed spectrum for DECT. You are advised to send Comments from your Indian subsidiary as well as from your head quarter. You may also encourage your distributor and other associates, societies etc to send comments. If you can encourage your local service provider to provide its comments, that would help immensely
4. You may of course make much shorter comments than DECT FORUM India (Annexure A to this template). If you want you may also abstain from answering some of the questions which you are not comfortable.
5. You are also free to comment on other parts of the Consultation Paper than those covered by the questions 3.1 – 3.10 prepared by TRAI.
6. Please do introduce your Company and area of operations.
7. If you have operations in India do emphasise that.
8. R&D and manufacturing Companies in India must emphasise this point.
9. Before sending your reply to TRAI, you may consider sending your reply to DFI for initial vetting and harmonisation purpose.
- 10. Last day for filling Comments is the 31st January 2012. Kindly ensure, your comments are submitted well in time.**

Date : 25 January 2012

To :

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

“Allocation of Spectrum Resources for Residential and Enterprise Intra-telecommunication Requirements/ Cordless Telecommunication Systems (CTS)”.

Company presentation
[Provided separately](#)

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?

[See DFI's response below.](#)

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?

[Mobile phones cannot offer the reliability and speech quality required for speech applications and mission-critical business solutions.](#)

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?

[De-licensed bands do not offer the quality and stability of protected bands. This is why DECT has been the technology of choice for enterprise applications in both Europe and the US.](#)

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

In view of providing high quality wireless communications to enterprises this is the right path.

3.5 Do you agree that the 1880-1900 or 1910-1920 MHz band (TDDMode) be allocated for digital CTS applications? If yes, what should be the limits of emitted power (EIRP), power flux density (pfd), antenna gain etc?

See DFI's response below.

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?

Elaborate studies have been performed and shown that there is no real impact on adjacent bands if DECT equipment is placed indoors.

3.7 Whether the de-licensing of either 1880-1900 MHz or 1910-1920 MHz band for low power CTS applications will result in loss of revenue to the government?

Wireless solutions help companies and government institutions alike to become more efficient so there is only a gain for the government.

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

There are no security threats associated with the DECT technology.

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?

See DFI's response below.

3.10 Any other issue?

(Provide your answer)

DECT FORUM INDIA DRAFT RESPONSE:

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 ISM(WiFi) band and the 1880-1900Mhz band for digital CTS as indicated under para 2. of the Consultation Paper, is sufficient for existing needs. If required in the future the 1910-1920Mhz band could also be considered for digital CTS applications. However, while the ISM(WiFi) band, which is suitable for data but not very appropriate for voice, is de-licensed, the 1880-1900Mhz band which is most suitable for voice is a licensed band. This has only discouraged users from taking advantage of the current available digital CTS technologies and to the best of our information no license requests have been made to WPC. Private space digital CTS technology for residential and enterprise use cannot work in a licensed regime as they are purchased off the shelf & no frequency planning is required. All over the world state of the art digital CTS works in a de-licensed 1880-1900Mhz band or 1910-1920Mhz band.

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: Yes there is a need for DECT phones. None of these technologies can provide an efficient solution for private space. DECT systems for residential and SOHO applications provide single cell systems covering the whole living area including the basement (cellar) etc. Furthermore, DECT systems can be used with no interference and full security for multiple co-located installations with no radio planning or licensing requirements. Cellular pico cell systems cannot provide this service. Furthermore they add to the revenue outflow for intercom calls.

DECT enterprise systems provide on-premises local mobility and *full coverage* through seamless handover between pico-cell base stations. The services offered are the wireless PBX telephony service and different low and medium rate data services for supervision, control, maintenance and alarms. The DECT local mobility pico-cell system is preferred as the cellular service is unable to provide the required quality, coverage, services or required integration with local key administrative and production systems. DECT can provide local messaging/broadcast and control functions for private space equipment. This is not possible in the case of cellular pico-cell services. Revenue outflow, licensing and frequency planning are other issues related to cellular pico cells.

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?

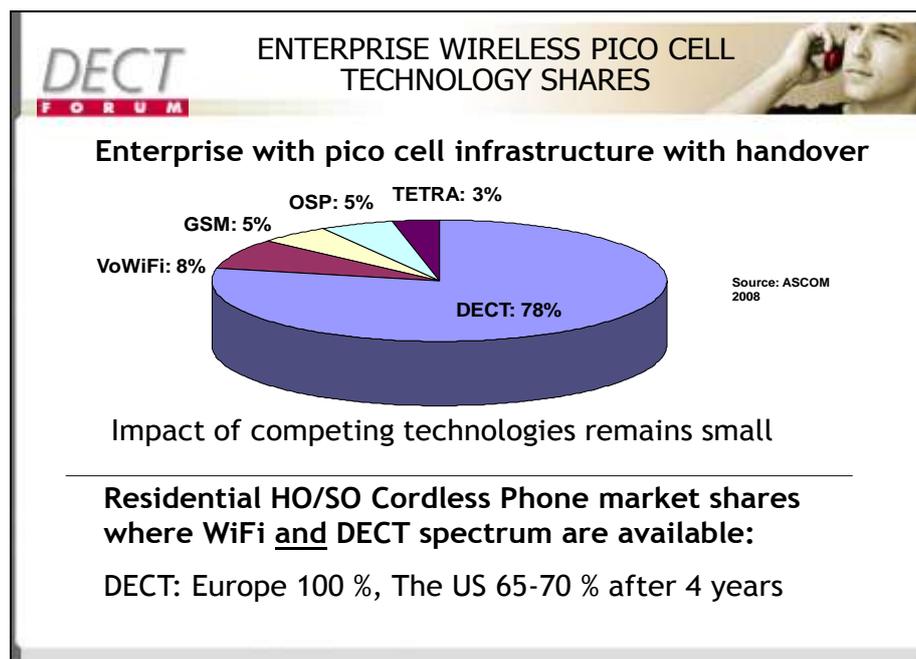
Answer: There is a basic difference between coexistence properties on a digital CTS band and on an ISM band (Wi-Fi).

The 20 MHz spectrum designated for digital CTS in other countries requires that equipment using this spectrum have to comply to specific dynamic channel selection procedures, power levels etc. It provides for maintaining high spectrum efficiency and

maintaining high quality radio links (e.g. speech and video) in an environment of a multitude of uncoordinated system installations. There is no interference between co-located systems and total spectrum is very efficiently shared between all the co-located systems.

The ISM bands (2,4 and 5 GHz) do not have any such feature. Opposite to a digital CTS spectrum having rules for uncoordinated compatible installations, the ISM bands allows for uncoordinated usage of a variety of incompatible communication devices and also domestic (micro wave ovens), industrial, scientific and medical devices. Therefore maintenance of a high quality of service will not be guaranteed when different ISM band devices are used in the same local area. This applies especially to voice and video services, but is less critical for best effort packet data services, where non-time-critical retransmissions are applied when expected collisions occur.

The above intrinsic differences between digital CTS and Wi-Fi CTS is clearly demonstrated in countries where both are allowed, as in Europe and the US. In Europe where DECT has been established for many years, there is literally no market for Wi-Fi CTS. In the US DECT has quickly become the dominant CTS at the expense of earlier domination of ISM band digital phones. Wi-Fi has not been able to compete with digital CTS regarding mission critical voice and real time medium rate data applications for enterprises. (The diagram below shows the market share)



It is obvious that India needs a 1880-1900Mhz license exempt protected TDD spectrum (defined by a coexistence etiquette) to provide state of the art residential and enterprise mission critical voice and medium rate data services.(Table 1.7 of TRAI paper substantiates that DECT is prevalent in all the major countries as now it is even adopted in JAPAN)

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

Answer: Yes it is absolutely essential in the best interest of the general public. CTS has to be license exempt to be successful on the market, in the same way that de-

licensing has been the key for the success for the Wi-Fi technology on the 2,4 and 5 GHz ISM bands. Even the earlier analog CTS band was de-licensed. As indicated in Chapter I of this Paper, de-licensing is the only globally accepted norm for private space digital CTS application. A licensing regime cannot be practically implemented for residential and SOHO applications. This is more so as the terminals are purchased off the shelf and deployed in totally uncoordinated way.

3.5 Do you agree that the 1880-1900 or 1910-1920 MHz band (TDDMode) 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 1880-1900Mhz band(TDD mode) is already allocated for digital CTS. If in future there is more demand for digital CTS then 1910-1920 MHz band(TDD mode) could also be allocated.

Terminal power (conducted): 250 mW (24 dBm)

Antenna gain: < 12 dBi.

(This specification is taken from the European Harmonized Standard ETSI EN 301 406.)

The antenna gain of 12 dBi is used in Europe and many other countries. In some countries other values are used. E.g. in the US 3 dBi are used. In the ITU specification of DECT ITU IMT-2000 TDMA/FDMA (DECT), 4 dBi is specified.....

DECT residential and enterprise systems are installed and used indoors. This is basically a non line of sight, NLOS, environment. In dispersive NLOS environments it is in principle the total power of all reflections, rather than the emission in a specific direction, that decides which power reaches the other end point. Thus the range as well as interference estimates will basically be dependent on the totally emitted power (the conducted terminal power), and rather independent of the shape of the antenna pattern.

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:With reference to the use of 1880-1900Mhz band for digital CTS and its interference possibilities into the adjacent cellular bands, as indicated in this paper at 2.8.3 there are plenty of documented studies on this subject as well as practical implementation in the developed world to indicate that adjacent band(cellular) interference issues do not exist.All over the world, including America and Europe, DECT systems are co-existing with cellular systems both in the 1880-1900Mhz and 1910-1920Mhz band.

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:The question of loss of revenue arises in the case of public services. CTS is a private space non-commercial application concept based on a de-licensed band as in the case of Wi-Fi bands and the earlier 46/49Mhz etc.It is adding revenue to the exchequer in terms of duties and taxes. It also enhances employment and revenue generation through manufacturing & R&D. Increased use of digital CTS will stem the

decline of around 30million existing land lines, increase ARPU on them and thus bring value to the huge sunk cost. Once landlines become popular again consumer will also go in for broad band, which is a Govt. initiative for e-governance, e-health, e-education. This itself will be biggest gain for the Nation.

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

Answer: CTS is using the public PSTN network like wired phones. No difference. Furthermore, the digital CTS radio link uses ciphering and authentication with the same security level as GSM/UMTS, thus providing secure private communication within the residential or enterprise space. This is one of the main reasons for the popularity of DECT systems globally as against the other private space services provided by commercial public telecom service providers.

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: A defined etiquette based CTS is a much better option, in fact the only practical option. Some of the etiquette parameters have already been defined by WPC in its Note 57 to the NFAP-2011. Other etiquette parameters could be added with the objective of de-licensing the band.