

From: randhir verma <ctsaregd@yahoo.co.in>
To: "cp@traf.gov.in" <cp@traf.gov.in>
Sent: Monday, 30 January 2012 10:37 PM
Subject: our comments on dect technology

Sr,

Please find enclosed our comments on DECT technology-TRAI consultation paper.

Regards,

Yours faithfully,
FOR CHANDIGARH TELECOM DIST. TELEPHONE SUBSCRIBERS ASSN.,

R.K. VERMA

PRESIDENT
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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: Allocated spectrum for CTS in the 1880-1900Mhz band for digital CTS are sufficient for the immediate needs of residential consumers in India.

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: Pico cell based cellular technology has not been offered to residential consumers in India by any operator in India. It is also doubtful whether the FMC technology could cater to the very large co-located residential needs without getting into interference problems. It also cannot offer the very high quality of voice that DECT systems offer and ease with which they can be bought from the open market and installed by residential consumers without the need for radio planning etc.

प्रधान सलाहकार (एम.एस.)
डायरी सं. 064
दिनांक 31/1/12

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: We understand that the quality of in-house voice service offered by DECT is much superior to WiFi based systems. We also understand that with the increased use of WiFi based equipment in the houses & offices there are interference issues with the WiFi cordless. We would prefer using the WiFi band exclusively for data broadband and having a separate band allocation for voice service. A choice of such a segregation would be best for consumers in India.

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

Answer: Yes – ABSOLUTELY ESSENTIAL IN CONSUMER INTEREST.
Consumers in India would only go in for a CTS technology which they can buy from the open market and use easily without any lengthy licensing issues. Consumers in India are same as global consumers and if this technology is available as a open market de-licensed technology to global consumers there is no justification in Govt. of India keeping the technology under a license regime.

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 1880-1900MHz band is already allocated for digital CTS technology(TDD Mode) vide NFAP-2011. However, for reasons best known to WPC it has been kept under a license regime, thus making it completely un-attractive as a usable technology for consumers in India.

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: DECT systems are being used all over the world where cellular networks both GSM & CDMA are working. 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: Government should use due diligence to act in such a way that there is no revenue loss to the government as is happened earlier. As the country is having lot much loss due to wrong policies and short term policies and FDI is already lot much in the telecom sector licensing fee should not be abolished. So question about de-licensing does not arise.

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

Answer: DECT systems are connected to direct lines or PABX just like wireline phones/ headgear sets etc. We therefore cannot understand the security concern here. However, from a consumer point of view the digital CTS technology should have sufficient security to ensure that un-authorized users are not able to use the system or listen to the conversation.

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: These are technical issues. As far as the consumers are concerned it should be ensured that whatever technology is permitted in the band should be low cost, low power, safe for human beings and does not create interference into residential systems of consumers located nearby.

3.10 Any other issue?

Answer: Whatever technology is coming or upgradation is taking place health hazards should always be taken into consideration.