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CONSUMER CARE SOCIETY@  
593, 24<sup>th</sup> Cross BSK II Stage, Bangalore-560070  
(Regd.under Karnataka Societies Regn. Act. 1960, Regn. No: 388/94-95)

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President:  
G S Gundu Rao  
Tel.: 26717338

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Tel: 26713616  
M-9845683220

Treasurer:  
K N G K Sastry  
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By Email

CCS/008/09-10  
December 4th, 2009

Dr J S Sarma  
Chairman, Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg  
New Delhi- 110002

CC: Sri M N Gupta Advisor(MN), email: [traí.mn@gmail.com](mailto:traí.mn@gmail.com)

Dear Sir,

Subject: T RAI CP No. 6/2009- Overall Spectrum Management-----terms and conditions

Reference OHD held in Delhi on above on November 30<sup>th</sup> November and December 1 and 2

We attended the above on our own in spite of TRAI not extending us any financial support considering the importance of witnessing the debate and discussions.

We do not propose to give our comments on each of the Issues for Consultations, as these questions have been thoroughly debated in the OHD, often leading to fierce difference of opinion representing the respective service provider's interests as well as their Associations in getting maximum financial and spectrum advantage

However we felt very sad and concerned that not one of them expressed any concern for the impact the high power mobile transmission has on environment and health of not merely the humans and other living species, it reflected the underlying philosophy of "let us maximize our profits, and these concerns are none of our business!" What an unfortunate thing that the service providers have for their concern for discharging their corporate social responsibility. We are really disturbed at this matter.

Having said that we wish to express in no uncertain terms our concern and through you the Government of India's different ministries concerned on these issues:

- (1) Impact of electromagnetic non-ionized radiations on humans and nonhumans. We are aware that an inter-ministerial Committee some time ago came out with their finding which

is neither here or there! We repeatedly requested all the concerned including TRAI that we want to participate in the Committee studies, as usual our request was totally ignored. We are planning to ask for the data considered by the Committee under an RTI Application as a separate issue. Please be kind to the consumers and say if any field measurements have been made by any agency to check the level of radiation in practical conditions and if so, please supply a copy of the data used and the equipment set up and the results of the survey. All results must comply with ICNIRP guidelines.

- (2) You must be certainly aware that to run in 24x7 basis whether in cities or other locations one has to provide a fossil fuelled genset consuming enormous amounts of nonreplaceable diesel. What effect is produced on environment?. Imagine the disaster we are planning for ourselves when literally 100s of 1000s Of mobile towers will come up in near future because the rural area is next target area for service providers. Can any one imagine the contribution we in India will be making for global warming?

According to information we have, a corporate operating CMTS services has estimated that” *for its global operation the company has used 1.31 million tons of carbon but it does not include Indian operations. Further that for India operation alone they have increased carbon foot print to the tune of 1.9 million tons. It is interesting to note that this company has only about 17% of Indian market share and that too mostly in urban areas. One can easily estimate the amount of Co2 emissions produced to manage energy requirement for telecom towers.*

*Yet another expert has estimated that the present annual requirement of 2.2 billion liters of diesel will increase to 17 billion liters of diesel per year to run telecom towers and this will amount to 600 million tons of carbon footprint per year. The present telecom infrastructure is highly energy inefficient and thus contributes in increasing carbon footage in a phenomenal manner.*

**Therefore immediate action is required to:**

Carry out an audit to check all installations and if there are any violations in the operation of mobile installations from the operational parameters they are authorized to, then a suitable penal action is essential or else it will mean violation of licenses. Such checks should not only be for a single licensee but all operators operating from same towers simultaneously. **We believe we have the required skills to contribute in these activities.**

Recognizing that every one is clamoring for additional spectrum, are there no other ways to achieve the same objectives by say, utilizing fixtures on the lampposts etc and avoiding the use of higher powers for transmitters causing all round pollution and irreversible damage to

the environment and affecting the humans and livestock? We should have a close look and evaluate the methods adopted by other countries as these problems are by no means peculiar only to us. We know that already soft membrane of eggs of sparrows and crows fracture and thus never hatch. Disappearances of sparrows and crows in urban areas due to this uncontrolled electromagnetic radiation. is already known. The honey bees will disappear by 2020 as they loose their navigational sense in high intensity electromagnetic field.

We have made informal inquiries from certain agencies who have the required resources to undertake such independent studies and the have expressed their willingness to participate. We need to take it forward to definitive phase after getting a go ahead from TRAI or other agencies.

It was quite correctly stated in OHD that radio spectrum is precious, and hence has to be used with great conservatism as we have to keep some of this for use in future to provide an as yet unknown communication facility. Hence optimum methods must be found to do so. For example test the feasibility of optimizing the number of carriers to provide maximum communications capability and pool and share the derived capacity from among the service providers on mutually agreeable terms and conditions and as a common. Asset, thus this then leads to prevent hoarding .

Some other points made by us are: Publishing in advance a date for OHDs, opening a discussion forum in the TRAI website and supplying hard copies of CPs to all CAGs

Regards

G S Gundu Rao

President, CCS

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December 11th, 2009

Dr J S Sarma  
Chairman, Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg  
New Delhi- 110002

CC: Sri M N Gupta Advisor(MN), email: [traí.mn@gmail.com](mailto:traí.mn@gmail.com)

Dear Sir,

Subject: T RAI CP No. 6/2009- Overall Spectrum Management-----terms and conditions

Reference OHD held in Delhi on above on November 30<sup>th</sup> November and December 1 and 2 and our comments dated 11<sup>th</sup> December 2009. This is a further response on above CP dated December 4<sup>th</sup> 2009

As there is a very strong demand for additional spectrum from mobile service providers, both existing and the new incoming operators, we propose for your consideration following method evaluate if the existing operators are using the allotted spectrum optimally both for existing traffic as well as near projected increases.

- Assuming they indeed are, and demands are justified, then on the basis of justified requirements, work out the incremental additions, say in steps of 1 Mhz.
- Consider 1 Mhz as the unit of additional spectrum, and either auction them or alternatively on payment basis of a fixed extra amount annually, with progressively increasing steps of such amounts, whichever is in the best interests of the Government, strictly following all the proven prudent precautions.

Regards

G S Gundu Rao  
President, CCS