

**n-Logue Communications Pvt. Ltd**  
**Response to Consultation paper on Spectrum Related issues**

Introduction:

n-Logue Communications is Category A ISP , that has been incubated by the TeNet group of IIT Madras to offer internet services in villages of India.

With over 1500 villages on the internet, this is already one of the world's largest rural tele-centre projects and has received national and international acclaim in being able to demonstrate that sustainable internet and telecom services can reach villages.

Background:

Since rural areas are difficult to reach, it is clearly important to use wireless solutions for the same. As growth in these places of business, is slow it is important that spectrum allocation takes this into account. It is also important to consider ISPs as a category (as different from BSOs) as the current spectrum charges are significantly higher for ISPs than BSOs (who are in any case offering data services also). We are happy to note that these issues are being addressed in this consultation paper and believe that this is a very good step.

**Chapter 2**

**(vi) Whether the band 1880 – 1900 MHz be made technology neutral for all BSOs / CMSPs / UASLs and be made available with the pair 1970 – 1990 MHz or should it be kept technology neutral but reserved for TDD operations only.**

As a leading operator in the country in offering Internet services to rural India , we have found that indigenously developed technology options are significantly more cost effective (especially at low volumes in a micro cell architecture) and enable viability to reach villages. Given the national theme of "Mission 2007 – Every village a Knowledge centre " by the Government of India , we believe that if this frequency band is allowed to other technologies , the same can significantly impact the roll out of connecting every village on the Internet and enabling services that can quantumly improve their lives in tele-medicine, e-agriculture, e-governance and distance education.

We are extremely concerned that if higher power technologies are allowed to operate in this band, it will impede and effect frequencies of low power technologies that currently operate in this band.

Even in the case of covering villages, the central switch is invariably placed at a Taluk HQ (or a small District HQ) where there would be high probability of interference if other CDMA operators are allowed to operate.

## **Chapter 4: Spectrum Pricing**

### **(ix) Is there a necessity to change from the existing revenue share method for determining the annual spectrum charge?**

The existing method for ISPs is a fixed charge method unlike that for BSOs. This leads to extremely high spectrum charges for starting operations. For ISPs operating in Urban locations a 2% revenue share is recommended akin to the charge that BSOs pay.

### **(xv) What incentives be introduced through pricing to encourage rural coverage and / or using alternative frequency bands like 450 MHz?**

For ISPs operating in rural areas, the task is humungous and all support and incentives should be given to them.

It is suggested that frequency in rural areas is given on a priority (in terms of speed of allocation) as well as supported by a ten year waiver on charges.

At the end of the period a nominal charge of 0.5% can be added on the Internet revenues that are collected.

The same criterion may also be considered for the future category of Rural Service Providers as and when they are introduced.