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The Advisor (NSL) TRAI, New Delhi

Sub. : Comments on TRAI Consultation Paper on "Implementation Model for BharatNet", dated 17<sup>th</sup> November, 2015.

The TRAI issued above referred Consultation paper on 17.11.2015 on the aforesaid subject and asked the various stakeholders to comment on the issues involved in the consultation paper.

In this regard it is submitted that MTNL has no specific comments to offer on referred issues. However the general comments are submitted below:

- Metro implementations are also in CPSE structure; hence as such the implementation of the Project through CPSE is not inherently wrong.
- Speed and time is an essence, hence any mid way change is not desirable.
- Involvement of Private Party's for utilization of this network through Managed services is desirable.
- This is a Project, hence in CPSE also this should be implemented like a Project based on the sound principle of Project Management Institute.
- The cost of the project can be reduced through Overhead laying of Optical fiber cable,. Gradually underground cable laying can be done.
- Since Fiber has unlimited bandwidth capacity, hence if any fiber of any operator is available then it should be used, rather than resorting new laying.
- Backhaul should be strengthened.
- Government should come as anchor customer.

(Virender Prakash) DGM(RA), MTNL CO

## NOTE: SIGNED COPY OF LETTER HAS BEEN DISPATCHED TO TRAI.