

To,

Advisor (NSL-II)

Telecom regulatory Authority of India
Mahanagar door Sanchar Bhawan
Jawahar Lal Nehru Marg (Minto Road)
New Delhi -110002

Subject : Comments on TRAI's Consultation paper on "In-Building Access by Telecom Service providers"

Dear Sir,

With reference to consultation paper no. 10/2016 on In-Building Access by Telecom Service Providers and first of all, we sincerely appreciate the initiative as taken by TRAI. Further, we are pleased to submit our comments as per questions also mentioned here-under.

- (1) Do you agree that there is a need to address the issues discussed in this consultation paper or the market is capable of taking care of these issues without having any policy intervention / guidelines in this regard ?

Radius Infratel Comment:

Based on points as discussed in the consultation paper and our experience in the market, we agree that there is need to address the in-building access related issues as market is not capable of addressing this of its own. Access to buildings get restricted due market practices followed by most of RWA's and some developers also. There is not much that TSP's can do as grant of access is in control of either builder or the RWA hence there is a strong need of intervention by regulatory authority and take a holistic view of the market situation /practice and on how it is impacting the competitive scenario.

Having said this, we would also like to support the sharing of infrastructure at last mile / in-building which is the solution to multiple issues as currently existing in the market which restricts the access or availability of multiple TSP's / ISP's

- (2) How can sharing of telecom infrastructure inside a residential or commercial complex / airport /hotels / multiplexes / etc. among service providers be encouraged ? Should the sharing of such telecom infrastructure be mandatory ?

Radius Infratel Comment:

Sharing of telecom infrastructure inside a residential or commercial complex can be encouraged if :

- Last mile / in-building infrastructure should be done by Infrastructure Provider(IP) and not by telecom service provider /s.
- Duplication of infrastructure should not allowed as it results in capital expenditure by multiple TSP's / ISP's and also in National wastage due to repeat digging / civil works etc.
- Sharing of infrastructure should be mandatory and as per a policy framework / guideline keeping the interest of all stake holders thus creating a win-win situation.

- (3) In view of the international practices given in para 18-23 of chapter –II of the consultation paper, what provisions should be included in the National Building Code of India to facilitate unhindered access for all TSP's ?

Radius Infratel Comments:

As per practices across the Globe and discussed under para 18-23 of Chapter II, currently National Building Code of India is silent about how to handle last mile telecom infrastructure. Given the fact that there is limited space and it would be difficult to re-invest in to make provisions for ever increasing need of citizens towards bandwidth and physical infrastructure to cater the same, there is a need to include in NBC:

- Mandatory Optical fiber based neutral infrastructure that can cater to current bandwidth requirement as well for future (It is evident from currently deployed copper based networks that they are increasingly getting choked and there is limited or no scope of up-gradation)
- Building rating vide a certificate and that either its "future ready" or "broadband ready" or "star rated" (2 star, 3 star, 4star and 5 star) depending upon technology used / bandwidth handling capacity of a given infrastructure at building (which can be different for residential and commercial buildings)

- (4) Any other option, which in your view, could resolve the issues discussed in this consultation paper ?

Radius Infratel Comments :

In order to resolve the issue regarding in-building access, there is one most important part that is existing buildings and its RWA's / authorities. It may be easier to incorporate guidelines in National Building Code of India or make a policy framework where new buildings/developments are brought in control and such issue may not exist in future . However, for existing societies, projects , RWA's there is a need to further brain storm as they are not falling under any such known category which can be regularized or brought under a single authority with predefined rules and regulations. Currently, this category is more driven under state rules hence may we request to discuss further on micro issue of dealing with RWA's / private building authorities for in-building access, may it be for TSP or IP.

