COMMENTS ON CONSULTATION PAPER ON NATIONAL BROADBAND PLAN By Dr.T.Balachandran, Member, Consumer Advocacy Group, Kochi- Stake-holder

Issues for consultation and comments

5.1) Intensive need based awareness creation among different groups of population with emphasis on its usefulness for various services including information gathering for enhancing quality of life, through good governance.

5.2) Provisioning of Broadband facility to govt. departments, utility services, health care, entertainment- users participation in social and democratic life.

5.3) Easy access at affordable cost, even from remote villages numbering over 6 lakhs.

5.4) Improve computer literacy.

Bring in user friendly application

Develop language agnostic software with Graphical User Interface.

Helping rural people to experience the utility of Broadband through public demonstration. 5.5) No, because the projected Broadband width required is gigantic at the level of Gbps. Also if the demand is very high the cost of the procurement from international service providers can be reduced by 50%. In addition owing to the evolution of new technology the demand will be on the increase only.

5.6) Agree that existing infra-structure is inadequate to support Broadband demand. Proper planning to incorporate futuristic demands. Implementation of new innovative ideas. Create net works in rural and semi-urban areas. Govt. must encourage construction of high speed Broadband connectivity. Go ahead with Broadband echo system. Create nationwide optical fibre network. Liberal funding is welcome. Above all the need arises for supporting proper legislation 5.7) The network topology perceived to support high speed Broadband using wireless technologies is nation wide broadband network- national optical fibre access in core network under Bharat Nirman common service centres etc. The new technologies like 3G, BWA services and the up coming technology 4G will support high speed Broadband.

5.8) Owing to its limitations regarding only 2Mbps speed within a limited distance of 3 kilometers from the exchange it will be wiser to search for alternate technologies.

5.9) Yes, we see prominent role for fibre based technologies in access networks in providing high speed Broadband in the next 5 years. What we shall do to encourage such optical fibres to facilitate high speed Broadband penetration is to ensure Right of Way which is the major impediments as on today. High initial investments and huge time lag also are detrimental. The need of the hour is creation of a viable business mode.

5.10) Changes perceived to encourage TV operators to upgrade their networks to provide Broadband are to make available the high initial investment and help cable operators to get high returns even in rural areas. Force cable operators to share multimedia content by regulation leading to formation of a Broadband "echo system". Net work connectivity must be guaranteed. Enforce Broadband for all policy. Reduce the cost of satellite connectivity in rural areas too. 5.11) Yes, non- availability of connectivity in rural areas has impacted existing schemes in rural areas. It is painful to note that the DIT sponsored NeGP succumbed to pre-mature death owing to want of transmission connectivity and apathy of the sole service provider.

5.12) Yes, it is time to set up a national optical fibre network extending to villages. This can increase the availability of satellite transponders, increase bandwidth and reduce cost of connectivity.

5.13) Yes, only a specialized agency similar to PPPP model can leverage on govt. schemes using robust, stable and scalable optical fibre technology.

5.14) The most favourable framework for national fibre agency for creating optical fibre network extending up to village levels will be-initial funding by govt. making use of MGNREG Scheme for non skilled work and from USO fund for optical fibre network. Funds from sale of 3G Spectrum also may be used. At the end, the network can be leased out to service providers or managed by a consortium of service providers.

5.15) Suitable time frame to roll out the project shall be 2 years. Several precautions are necessary including a special parliamentary legislation to solve the ROW hurdle.

5.16) Yes, as the fixed line Broadband is "an always on" data connection with a minimum download speed of 256 Kbps, whereas a mobile broadband is "not always on" as it is allotted on request only. The speed of the internet access is based on the design of the network. So the minimum band width criteria may not be fulfilled. In short mobile internet access may not always fulfill the criteria of minimum bandwidth required for a Broadband.

5.17) Present Broadband definition cannot support intensive application. The Broadband must be redefined to support minimum download speed of at least 2Mbps so that it can drive service providers to upgrade their network resulting in enhanced demand of such services.

5.18) Speedy ROW permission shall be made available by vesting the authority in a single agency at an All India Level instead of the present multi agency nature. The ROW charges are very high and vary from area to area. These too have to be brought under one authority to protect from exploitations. Clearance procedure must be made simple, short and less consuming. The model guidelines adopted and circulated in April 2008 hall be implemented urgently.

5.19) We may have to wait long to see competition as competitors are almost unknown in this field.

5.20) Broadband usage charge must be brought down considerably classifying it under essential service to make it affordable.

5.21) Simple and flat monthly tariff plans will enhance Broadband acceptability and usage.

5.22) Broadband tariff needs regulation in view of low competition to protect it from monopoly.

5.23) This can be based on the ITU report "the ICT Development Measurement Index 2009". The fixed Broadband tariff shall be fixed at the lowest level until it penetrates to poor population. It is time to have innovative tariff plans with flat fee offering with unlimited data usage or time based plans.

5.24) This is possible only by content hosting within the country. Content hosting by domestic telecom operators can play important role in reducing the content hosting charges.

5.25) This can be done by either by using international private lease circuit or through a IP Port. 5.26) Low hosting of content in India increases internet charges. It is time that mirroring of popular website is encouraged in India. Request IT union and others to enforce transparency in the retail sale price of international internet bandwidth by its service providers, to ban users and retailers who often get up to 50% discount. It appears that the price of international bandwidth is reduced considerably if the size of the connectivity pipe is more than 10 gigabytes. Hence the urgent need is to unite the segmented service providers who higher STM-1 or STM-4 only under one umbrella- a fat back bone. TRAI must initiate such a proceeding with the help of Planning Commission's infrastructure.

5.27) No answer

5.28) The only way is to ensure that QOS of Broadband is to implement all the 9 parameters stipulated in the "quality of service of broadband regulations issued in October 2006 by TRAI in

protecting the interests of consumers of broadband service. There is no valid reason for its non implementation till date.

5.29) Bad quality of Broadband connectivity is crippling the Broadband growth. The present procedure for monitoring parameters as mentioned in chapter 451 has proved to be far from truth. Hence the need of the hour is entrusting this work to CAGs. Ensure timely up gradation of the network by service providers. Restrict the number of subscribers depending on the quality of network .Ensure use of well defined contention ratio – 4 guidelines issued by TRAI in February 2009 to all service providers. It is regretted that service providers never display on their websites the contention ratio adopted.

5.30) There is a need to redefine the existing quality of service parameters considering future bandwidth hungry applications and user expectation from a vast country like India. Changing demands towards high speed applications bring about calls for changing quality of standards. High data download speeds better upload speeds and reduced latency to meet customer requirements are the need of the hour.

5.31) High cost of customer premises equipments are really a matter of concern as it makes non affordable to common man. Hence the need arises looking for low cost alternatives such as Netapps, notebook and centralized application facilities. Fical incentives are most welcome.
5.32) Development of the content in Indian vernacular languages can be easily done as such provisions already exists in present day videos allowing selection of any languages.
5.33) Yes, regulatory and licensee charges to boost Broadband penetration are welcome for

disciplinary growth/development.

5.34) Yes

5.35) Foreign direct investment shall be encouraged.