



RSM/COAI/2017/189

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**Subject: COAI Response to TRAI Draft Recommendations on
Ease of doing Telecom Business in India**

Dear Sir,

This is with reference to the TRAI Draft Recommendations on Ease of doing Telecom Business in India, released on September 19, 2017.

In this regard, please find enclosed COAI response to the TRAI draft Recommendations.

We hope that our submission will merit your kind consideration and support.

With Regards,

Yours faithfully,

Rajan S. Mathews
Director General



**Response to TRAI Draft Recommendations on
Ease of doing Telecom Business in India
Released on September 19, 2017**

At the outset, we would like to Thank TRAI for giving us the opportunity to respond to the draft Recommendations on the '**ease of doing businesses**'. Our members are encouraged by the step taken by TRAI to suo moto issue the paper on Ease of doing Business in March 2017 and now issue the draft Recommendations for the further inputs of the stakeholders.

I. Our response to the draft Recommendations are as below:

A. SACFA Site Clearance:

Draft Recommendation: *The Authority recommends that entire process of SACFA clearance as well as grant of all licences/approvals, that are issued by WPC, should be made paper-less and executed end-to end through online platform.*

COAI Comments:

1. We agree with the above Recommendations.
2. Further, we would like bring to the kind attention of TRAI following additional point w.r.t reduction in the SACFA Application Fee:
 - a. Currently, Licensees have to pay Rs. 1000/- per application while applying a SACFA through WPC online website/ TSP has to pay application fee separately for GSM and MW (link to link).
 - b. In addition to the above, TSPs are mandated to take clearance for every antenna being added on any existing site/ tower for which SACFA clearance has already been obtained from WPC under the "Additional Antenna" category.
 - c. The current Application fee and its structure need to be reviewed.

- d. **It is suggested that WPC should charge Rs 1000/- basis per 100 application lots instead of each application to compensate the administrative / website maintenance charges.**

B. Import Licence for Wireless Equipment's:

Draft Recommendation: *There should be a defined time-line within which an Import Licence should be granted and the same may be declared in the portal as well as in the Citizen's Charter.*

COAI Comments:

1. Presently, telecom operators are required to acquire import licenses for all RF equipment procured from outside the country. Without the same, Customs department does not clear the entry of RF equipment into the country. This requirement is a major bottleneck, as getting a clearance takes up to 1-2 months and during this time, the RF equipment are withheld by the Customs.
2. We believe that the whole objective of an import license is merely to ensure that the DoT is informed of the details of imported RF equipment as well as its installation in licensed service areas. **We believe that this objective can be achieved by DoT by seeking periodic reports from telecom operators rather than requiring them to seek separate license for all RF equipment**
3. Further, if TRAI believes that there is need of import license for wireless equipment's then we request **TRAI to kindly Recommend a timeline e.g. 15 days** , within which an Import Licence should be granted

Draft Recommendation: *TSPs should be allowed to reinstall/deploy their wireless equipment into another LSA after giving prior intimation to WPC preferably through the online portal. There should not be any requirement of taking prior permission of WPC for this purpose.*

COAI Comments:

4. We agree with the above Recommendations.

C. WPC clearance for DEMO Licence and Experimental Licence:

Draft Recommendations: *Authority recommends that the applications for Demonstration Licence and Experimental Licence should be processed and the licence should be granted within a maximum period of 15 days and 30 days respectively. This time period should be declared at the portal as well as in Citizen's Charter.*

COAI Comments:

1. We agree with the above Recommendations.

Draft Recommendations: *the Authority recommends that the validity period of the Experimental (radiating) Licence should initially be six months, extendable by another six months.*

COAI Comments:

2. We are of the view that the validity period for Experimental license should not be more than **6 months i.e. validity period should be for 3 months and extendable by another 3 months.**
3. Further, we would like to submit that Experimental license should be granted only with following conditions:
 - a. There should not be any interference with licensed frequencies.
 - b. There should not be any commercial use with no test users
 - c. Also, license should be taken as per Section 4 of Indian Telegraph Act.

D. Transfer/Merger of Licences:

Draft Recommendations: *Delay in Approval of Merger proposals by Licensor*

When any merger proposal of companies as filed before the Tribunal is notified, representation/ objection, if any, by the Licensor on such scheme has to be made within 30 days. The Licensor should use this window of 30 days to file objections, if any, for the merger of licences also. DoT should spell out a definite timeline, not exceeding 30 days post NCLT approval, for providing written approval to transfer/merger of licences by the Licensor and it should be made a part of the M&A Guidelines.

COAI Comments:

1. No Comments. Our members will individually represent on this issue.

Draft Recommendations: Market Share of Merged Entity

The current provisions of M&A guidelines do not define a red-line for the market share of resultant entity in a service area. Therefore, DoT should define a cap on the permissible

market share of the merging entities taken together; beyond which merger proposal should not be accepted.

COAI Comments:

2. No Comments. Our members will individually represent on this issue.

Draft Recommendations: Date of effect of Merger and Acquisition:

If a transferor company holds a part of spectrum, which (4.4 MHz/2.5 MHz) has been assigned against the entry fee paid, the merged entity should be liable to pay the differential amount for the spectrum assigned against the entry fee paid by the transferor company from the date of written approval by DoT.

COAI Comments:

3. No Comments. Our members will individually represent on this issue.

E. Rationalizing of prescribed fee for testing of roll-out obligations

Draft Recommendations: the Authority recommends that the TSPs should be charged for roll-out obligations test fee only for the DHQs/ BHQs/ SDCAs which are actually tested by TERM Cells. The Authority also recommends that there is a need to rationalize the structure of testing fee to avoid double payment for testing the same MSC. MSC test fee should only be charged once for all the towns served by the common MSC, which are being tested by TERM Cells under sample testing.

COAI Comments:

1. We agree with the above Recommendations.

F. Net-worth requirement for migration from UASL to UL

Draft Recommendations: the Authority recommends that for an existing service provider, for renewal of licence or migration of its licence to UL, the condition of minimum net worth should not be applicable

COAI Comments:

1. No Comments. Our members will individually represent on this issue

G. EMF compliance and certification

Draft Recommendations: *the Authority recommends that in respect of EMF compliance, DoT may review the need of calling biennial certification for all the existing sites of every TSP. The Authority also recommends that TSPs should be asked to submit all requisite certifications only through Sanchar Tarang portal. TSPs should not be required to re-submit these certificates/reports separately in any other forms such as in hard copy or through email.*

COAI Comments:

1. We agree with the above Recommendations.
2. We would further like to request that only the tenant who carries out an upgrade or a new site addition shall be submitting an upgrade self-certification. The TSP shall be updating the portal for the changes being made and notifying all other tenants to this effect using the portal. There shall be no need for other tenants to submit an upgrade certification for the same site.

H. Bank Guarantee:

Draft Recommendations: *the Authority recommends that PBG for a particular phase of roll-out obligations should be released after successful certification by TERM Cell. If TERM Cell fails to submit its report within 12 months after the date of offer, PBG should not be held back on account of pendency of testing. Further, DoT should review the process adopted by CCA for the refund of bank guarantee and should ensure that CCA do not take more than 30 days for the release of bank guarantee.*

COAI Comments:

1. We agree with the above Recommendations.

I. Publishing of OSP registration holders in website

Draft Recommendations: *the Authority recommends that DoT should place an updated list of OSP registration holders with their validity of registration and place of OSP centre at its website.*

COAI Comments:

1. We agree with the above Recommendations.

J. Revision of existing financial penalty structure

COAI Comments:

Draft Recommendations: *the Authority recommends that DoT should device a suitable matrix, linking the penalty to the severity of the incident and the number of occurrence of the violation for imposition of financial penalties.*

1. We agree with the above Recommendations in principle, however the same is without prejudice to our contentions that penalty has to be in consonance with the provisions of the Indian Telegraph Act.

II. Additional issues that need to be resolved for facilitating the Ease of Doing Business:

1. Subscriber base methodology as per DoT's letter dated 29.08.2005:

- a. This is in reference to the Department of Telecommunication (DoT) circular number 842-582/2005-VAS dated 29.08.2005, and its corrigendum dated 07.09.2005, vide which DoT had prescribed the format and methodology for reporting of subscriber base.
- b. In the explanatory notes to the said instructions, the deductions clearly articulated that the subscribers who do not generate revenue are required to be excluded from total subscriber count. **Thus, we believe that in principle, non-revenue generating subscribers need to be excluded from the total subscriber count.**
- c. TRAI also issued circular dated 08.12.2005 vide which it asked TSPs to report the count of subscriber base to TRAI, as per the format prescribed by DoT.
- d. In this regard, we would like to make following submissions:
 - i. All our member operators are furnishing information of their subscriber base to DoT as well as to TRAI based on the format prescribed by DoT vide its instructions issued in 2005 and its understanding prevailing for more than a decade.
 - ii. In line with the explanatory notes and its understanding, non-revenue generating subscribers are included under deductions items given in the format prescribed by DoT.
- e. We would further like to highlight that substantial changes have taken place in last decade or so with respect to validity period, subscriber retention etc. Some of the

definitions prescribed in the explanatory part of the DoT letter of 2005 on these aspects are not applicable now.

- i. We would also like to highlight that in the current market scenario, a lot of subscribers have multiple SIMs and a large number of these SIMs remain idle and do not generate any revenue, hence it is pragmatic approach to not to include these in the subscriber count.
 - ii. We would also like to mention that inclusion of non-revenue generating subscribers will not only be against the principle laid down by DoT but also provide an incorrect picture of industry as well as give inflated subscriber figures.
 - iii. Thus, based on the understanding of the format prescribed by DoT read in conjunction with the explanatory notes, all the TSPs are submitting the subscriber information which provides the correct picture by excluding the non-revenue generating subscribers.
 - f. Also, we would hereby like to mention that the service providers are adhering to DoT's circular with regard to subscriber verification audits and are providing complete dump of HLR to TERM cell; while, in case of subscriber number declaration, the reports are being submitted to TRAI and DoT centrally on the basis of revenue earning subscribers due to redundancy of concepts like subscriber retention period expired etc.
 - g. **Therefore, we request TRAI to kindly recommend to DoT to issue a clarification regarding the methodology being followed by service providers to declare the subscriber numbers on the basis of revenue generating subscribers.**
2. **TSPs should be allowed to dispose off their network equipment on commercial terms to licensed TSPs:** We would hereby like to submit that the TSPs should be allowed to dispose of their network equipment on commercial terms to licensed TSPs. For example with trading being allowed and consolidation underway in the sector, if any TSP has excess equipment (BTS etc.) lying idle, it should be allowed to dispose off the equipment to any other TSP . The same will ensure better utilization of existing resources as well as give the exiting TSP some residual value as equipment is usable instead of it being disposed off as scrap.
 3. **Subscriber Verification process for J&K, North East and Assam Circles:** At present the subscriber verification process in J&K, Assam and North East for acquisition of new customers is different as compared to other telecom circles. Considering the fact that a robust eKYC process based on Aadhaar based verification has already been established, the present subscriber verification process devised for these circles should be done away with, in case the subscribers are being acquired through eKYC based process.

4. **Permit National roaming to prepaid customers in J&K:** At present national roaming in J&K service area is allowed only for post- paid customers. Since the Aadhaar based e KYC process provides for a secure and robust mechanism of subscriber verification, prepaid subscribers who have been verified through e-KYC mechanism should be allowed national roaming facility in J&K service area.
5. **Continuation of prepaid services in telecom circles of J&K, Assam and North East:** At present, prepaid services are extended on yearly basis in the circles of Assam, North East and J&K. It is suggested that prepaid services should be allowed to continue for subscribers verified through e-KYC route. Further, when the subscriber verification is allowed only through Aadhaar based e KYC process, the prepaid services should be allowed on permanent basis in these service areas.
6. **Submission of separate board resolutions and power of attorneys:** Currently service providers are required to submit separate board resolutions, power of attorneys etc. at each time for the participation in spectrum auctions, spectrum trading, USOF tender, bidding etc. As the respective board resolutions and power of attorneys of the concerned authorized signatories are already submitted to the Government confirming their respective authorizations, there should not be any further requirement for submission of separate board resolutions/Power of attorneys every time for each specific purpose.

III. In our response to the Paper on Ease of doing Business, we had highlighted various process related issues which are not part of the draft Recommendations; we would again like to highlight these issues for the consideration of the Authority:

1. **Introduction of M Bill enabling replacement of hard copy of mobile bill as default option for postpaid subscribers:**
 - a. We are of the view that the introduction of mobile bill (M Bill) or e- bill as a default option for the postpaid subscribers would provide a much needed boost to the Government of India's efforts towards digitization.
 - b. The M-bill option has been worked out for such customers who may not have an email account for receiving the telephone bill.
 - c. M-bill is not only environment friendly but also leads to cost reduction for the telecom service providers. These options will provide support to the Government's policy objective of Digital India as well. At present, the 46th amendment to the Telecom Tariff Order (TTO) mandates service providers to provide a hard copy of the bill by default to

the customer. There is no provision to provide the customer the default option of paper less bill in form of E-bill or M-bill.

- d. **With the introduction of M-bill as another option for paperless billing, it is requested that the extant 46th TTO may be amended so that M-bill or E- bill can be considered as default option for postpaid billing.**

2. **Simplification under the current process of taking prior approval for Remote Access (RA):**

- a. All the licensed telecom operators requiring remote access approval of their Indian locations through designated and identified foreign locations, have been duly submitting their respective applications as required vide letter dated December 7, 2007 under the extant RA policy as stated under Press Note 3 of 2007 dated April 19, 2007, which has been duly incorporated in all the telecom licenses. The current dynamic scenario requires the processes to be responsive in order to thwart cyber threats, meet the Quality of Service norms and for general hygiene / upkeep of the network.
- b. The current process of obtaining prior approval for remote access from foreign locations has proved to be extremely time consuming and leads to continued, unexplained and inordinate delays in obtaining approvals. This delay is a barrier in efficiently managing the networks, especially in case of disaster or failure of particular RA locations, having serious implications for maintenance of networks, as also from quality of service perspective. Especially in the current era, cyber security threats have become a serious challenge and need to be tackled efficiently and proactively.
- c. The licensees have made substantial investment in their networks and they should be allowed to legitimately operate without any overbearing conditions which impair their ability to attend to issues in a proactive manner. The change in the process requested will provide the much needed operational flexibility to telecom licensees to operate their network and also in addressing / eliminating the risk from cyber-attacks and other security threats.
- d. We request that the existing process be changed to “**prior intimation**” as against the current process of seeking “**pre-approval**”. This will help the telecom licensees to proactively and reactively mitigate and thwart such threats and prevent any such cyberattacks on their network on a timely basis. It is suggested that the process of intimation, be introduced instead of the current process of obtaining prior approval of locations which is time consuming and builds in uncertainty into the process. The TSPs will continue to provide all the required information and in the manner as prescribed. Also the existing process be made more transparent and responsive from timelines perspective.

3. Introduction of a system of LFDS:

- a. DoT should develop an e-portal for the submission of LF and SUC, Electronic/ online filing of licensees' returns as per the TRAI Recommendation dated 06.01.2015.
- i. TRAI vide its Recommendation dated January 2015 on "Definition of Revenue Base (AGR) for the Reckoning of License Fee and Spectrum Usage Charges" made following recommendations:

"The Authority is of the view that steps should be immediately taken by the DoT to introduce a system of LfDS w.e.f. 1st April 2015 and develop an e-portal for submission of LF and SUC by 1st April 2016. The Authority also recommends that the transition to the LfDS system may be initiated at the earliest, by putting in place a system for electronic/ online filing of licensees' returns."

- ii. Though TRAI had recommended a transition to the LfDS system, there has been a little progress in this regard.
- iii. **We request TRAI to kindly reiterate its Recommendations dated January 2015 to DoT on LfDS and other AGR related for the early action by DoT**

4. Set-off of license fee paid on input services against license fee payable on output services:

- a. There must not be any double taxation on industry. However, this currently exists, as payments made for critical inputs like bandwidth are currently not allowed as deductions while calculating AGR on which license fee is payable by a telecom operator. This is even when the bandwidth provider is subject to license fee on revenue received from service provider. This could seriously hamper the objective of high internet & broadband penetration in the country and is grossly unfair to the telecom industry.
- b. Further, the telecom industry should follow the proven principles behind GST; wherein such tax/levy is payable at each step of Input Services and thereafter is adjusted or set off against such tax/levy payable by the recipient of such service.
- c. Accordingly, every provider of services, on which, as per license, is supposed to pay license fee to DOT, would charge the said license fee as a part of the invoice to the recipient of such services and deposit such license fee with DOT.

- d. The recipient of the service should be allowed to deduct said license fee, charged by input provider, as per point 'c' above, out of total license fee payable by the recipient. This would thus be on the same line as G.S.T. or service tax where set off of amounts paid on inputs are allowed against amount of G.S.T. or service tax payable on the output.
 - e. **Thus, like in the case of GST, the set-off of license fee paid on input services against license fee payable on output services should be allowed**
5. **Doing away with multiple audits:** It is well appreciated that conducting an Audit is a time consuming exercise involving substantial resources. TSPs already have their quarterly and annual audits by the Statutory Auditors as they follow the highest standard in corporate governance. We believe that these audits are sufficient and there should not be duplication of efforts by multiple audits in a given financial Year. The same will help in saving the duplication of efforts, wastage of time, manpower and precious public resources.
6. **Increase in RF transmit power from BTS:**
- a. At present, TSPs have been allowed to transmit only at 20 watts power. This is has been set historically from the time when GSM, operating with a channel bandwidth of 0.2 MHz, was the predominant technology.
 - b. Unlike GSM where the transmitted power is concentrated in a bandwidth of 0.2 MHz, the power is distributed in a much wider bandwidth, typically 5 MHz, in case of 3G/4G (LTE).
 - c. Further, all 3G/4G technologies are operating in different frequency bands and the free space losses are different in different frequency bands.
 - d. TSPs have been requesting to allow transmission power from BTS to be in the range of 60-80 Watts power instead of presently allowed 20 Watts. The lower transmit power reduces the network coverage and results in inefficient use of the spectrum.
 - e. The radiated power from BTSs is already being monitored via the EMF guidelines, which prescribes the maximum power allowed to be received at any place.
 - f. Further, while assigning BWA spectrum, DoT has permitted different BTS output power ranging from 10 watts to 40 watts to different operators, which creates non level playing field and needs a correction.
 - g. **TSPs should be allowed to configure 60-80 W transmit power while maintaining compliance to the EMF norms.**

7. **E-acquisition of Enterprise Business Customers and acceptance of optical/digital signatures:**

- a. E-acquisition of enterprise customers through on-line web portals/e-CAFs should be allowed in place of existing cumbersome process of hardcopies collection of CAFs and other documentation proofs.
- b. Optical/digital signatures should be allowed for subscriber acquisition and various contract executions. This will ensure the faster execution of the contracts and subscriber acquisition processes.

8. **E-collection and storage of all subscriber documentation:**

- a. E-collection and storage of the subscriber documentations should be allowed by the concerned authorities instead of the existing mandatory requirements of storage in hard copies.
- b. This will be an environmental friendly step and will help service providers to reduce their cost in terms of warehouse space/charges and also the cost involved in collection, transit and storage of hard copies

9. **Electronics Manufacturing Ecosystem:**

- a. Telecommunication technologies are changing rapidly with time and have advanced design & development needs to cope up with the market demands and trends. Presently, India does not have any FAB unit to support the manufacturing and supply of silicon components for domestic consumption. Today no single country has the capability to manufacture all the raw-materials required for a telecom product or to produce all the telecom products in a solution. These procurements are met from multiple countries; multiple suppliers
- b. India's manufacturing has got to be addressed as a complete ecosystem. Easy availability to quality components and Raw Materials is possible only if global raw material suppliers are incentivized to manufacture domestically. This will accelerate manufacturing and build widespread manufacturing capability.
- c. Thus, an eco-system comparable to the global manufacturing ecosystem needs to be created in India, which should include:
 - i. The Government of India should encourage the Global Silicon Manufacturers to manufacture the Silicon in India; once the FAB Unit is ready, it can supply to meet

domestic needs as well as to export to rest of the world as a HUB for meeting the global requirements.

- ii. Cumbersome paperwork around import and export should be removed as the same will lead to cost effective and efficient delivery of products from a Make in India plant.
- iii. Logistics/ warehousing/ global distribution hubs.
- iv. 24X7 customs clearances, fast track clearances for manufacturing.
- v. Easy and free movement of new and used capital goods/ test equipment in and out of the country.
- vi. Raw material import and re-export of unused/excess/obsolete (subject to strictly adhering to WEEE take back guidelines and audit by authorities at regular intervals).
- vii. High tech faulty products for Repair and Return business targeting global volume.
- viii. Fast track and incentivize material hub concept (Free trade warehousing zones).

10. Safety and Security testing requirements:

- a. Addressing redundant and burdensome safety and security related testing requirements for ICT products will reduce compliance costs for telecom operators and ensure access to cost-effective and cutting-edge technology. We strongly recommend that GOI should:
 - i. Reform Compulsory Registration Order (CRO)/Safety Testing requirements to remove bureaucratic delays, lower compliance costs and improve the ease of doing business for telecom operators. Specifically, MEITY should expand the Highly Specialized Equipment Exemption to cover all professional equipment; eliminate factory-based registrations, which only creates repetitive testing for the same products, and take meaningful steps to simplify the CRO paperwork
 - ii. Avoid creating redundant and India-specific security testing requirements for ICT products purchased by telecom operators. We urge DoT to work closely with all stakeholders, including global telecommunications service providers and equipment vendors to ensure the implementation of the telecommunications' security provisions which do not undermine basic IP protection or create obligations outside of global norms that will isolate India.

11. TEC interface approvals:

- a. Interface approvals requirement for the Point of Interconnect (POI) with BSNL and MTNL should be discontinued. This is a requirement, which was established during pre- economic liberalization in India and pre-national telecom policy & telecom reforms, where DoT/ BSNL was the only provider of fixed telephony services as a national carrier. This policy of Interface Approval requirement to induct or interface equipment with the National carrier would have been implemented to stop non-standard equipment that could cause damage to the switching equipment, when “Solid State Relays” are operated (may be to prevent relays generating high currents asymmetrically damaging the connected apparatus).
- b. With the advancements in technology, products being developed, miniaturization of silicon components and most importantly the products being manufactured by the reputed global manufacturers based on international standards such as ITU, 3GPP, ETSI, ANSI etc.; it is highly unlikely that an equipment being interfaced with BSNL/ MTNL would cause any damage; when the same is not causing any damage to private telecom operators when they are interconnected with each other at their POIs.
- c. Also, time required for this approval stretches beyond one year at times and DOT needs to review this practice and discontinue it. Operators have a robust system under which every node is thoroughly tested before induction. No testing is required if two Private operators interconnect, hence there is no rationale for this to be mandatory for POI with BSNL / MTNL.
- d. **We therefore request Government of India to abolish the age old requirement of TEC I/F approval as part of improving ease of doing business conditions.**

12. High Interference due to installation of illegal Repeaters, Boosters, Jammers and faulty / leaky equipment of Cable TV operators:

- a. TSPs across all circles face high interference due to illegal transmission by repeaters/boosters and faulty / leaky equipment of cable TV operators. This interference which is of a magnitude of -10 dbm to -50 dbm is affecting quality of service parameters across all services. The interference from repeaters/boosters/jammers and faulty/leaky cable TV equipment have become so prominent that it prevents the licensees from providing flawless telecom services and even in launching of services.
- b. While the WMO wing of TERM Cell has visited the impacted locations and has come across illegally deployed repeaters/boosters. However, they have expressed their

inability to act against such persons/organization in possession and operation of such repeaters as well as against the persons selling such repeaters citing constraints with the powers conferred to them.

- c. However, we believe that DoT is empowered to take action against such persons/organization as per the power conferred by The Indian Wireless Telegraphy act 1933, to DoT for removal/confiscation of the illegal transmission equipment:

- Clause 6 (1) (A) - "Offence and Penalty":

"Whoever possesses any wireless transmitter in contravention of the provisions of Section 3 shall be punished with imprisonment which may extend to three years, or with fine which may extend to one thousand rupees or with both"

- Clause 7 – "Power of search":

"Any officer specially empowered by the Central Government in this behalf may search any building, vessel or place in which he has reason to believe that any wireless telegraphy apparatus, in respect of which an offence punishable under Section 6 has been committed, is kept or concealed, and take possession thereof"

- d. **In light of above, the Government needs to take the following action:**

- To ban the sale of illegal repeaters and direct TERM/WMO wings to conduct raids to check this.**
- Authority should be granted to TERM/WMO wings for seizure/confiscation of illegal Repeaters, Boosters, Jammers and faulty / leaky cable TV equipment causing interference.**
- Time bound resolution of identified Interference cases, so as to provide flawless services.**

13. **Restrictions on Fiber deployment needs to be removed:** The present rules doesn't allow fiber to be laid using electric poles due to various restrictions imposed by local bodies like Municipal corporations etc. on the Discoms. Discoms are not allowed to generate commercial revenues using this infrastructure (that includes even commercial hoardings etc.). We request that there should be a PAN India provision to allow TSPs and their partners to lay Fiber using the existing electric poles. This will ensure faster deployment of fiber in India and help the Industry to overcome the delays which are still being faced on the

ground due to timely Right of Way (ROW) and other related approvals. We further, request TRAI to reiterate its Recommendations on “Delivering Broadband Quickly: What do we need to do” released on 17.04.2015.
