

From: Pankaj <pankaj.kumar@citycom.in>

Date: Mon, Feb 14, 2011 at 5:41 PM

Subject: FW: Citycom Networks Private Limited reply on Trai Telecom Infrastructure Policy Consultation Paper No. 1/2011

To: tdra.trai@gmail.com, tdra@tra.gov.in

Cc: alok.trai@gmail.com

Dear Sir,

We are pleased to give counter comments from Citycom Networks Private Limited in response to the Consultation Paper 1/2011.

1. Diesel fuel subsidy for rural operations: The comments that a Diesel fuel subsidy is required for operating diesel generators in rural sites on grounds of high operating costs should not be considered by the Government. If a subsidy is given, it will preserve and protect a system that has not produced the desired results for rural tele - density across so many years. The challenge today is to encourage the power efficient infrastructure equipments to overcome the issues posed by lack of power and make appropriate investments in that direction, rather than submitting to the status quo and finding ways to operate within it- in this case trying to keep on using diesel as the preferred alternative in the absence of electricity.
2. Reduction in the number of towers, In Building solutions and DAS: Some comments have been made with respect to these three issues where it has been said that through IBS and DAS the reduction in the number of towers would not be significant. Also fears have been raised that these technologies suffer from serious impediments and that they are better suited to new planned areas rather than in existing urban settlements. We do not agree with this point of view. These are established and proven technologies and are being deployed globally in the networks. Government must consider the use of such technologies to control the proliferation of towers and help to control the impact of towers on the skyline and environment of our urban settlements.

Regards,

Pankaj Kumar

Chief Regulatory Officer

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