

Comments by Pacific Telecommunications Council India Foundation

On Draft NTP-2011

(The comments below are arrived at after discussion in an internal Roundtable of the Executive Committee of PTCIF)

1. There was unanimity that the 'Draft' has tried to capture the best of everything – which is really speaking not well enough! Moreover, it has set lofty objectives, but it does not promise what the Government would do. There is need for incorporating quantitative measures in respect of various taxes, right of way, R&D, manufacturing etc. etc.
2. The Draft bears no reference to the 'Telegraph Authority' which is embedded in the present Act. In turn there is need to advise all State Governments that the Telegraph Authority would need no permissions in respect of certain specified activities. Moreover, it would be in order to declare Telecom as an 'essential' infrastructure.
3. Broadband on demand – is a good objective. However a speed of 2 Mbps should be stipulated right from the beginning; otherwise benefits of various dependant facilities and services would not accrue to the citizen.
4. In order to achieve the objective of a fully connected India, fibre-to-the-home (FTTH) should be aimed to be made available to all areas of the country by 2015. Use of electric poles for slinging optical fibre cable could be considered as a cost effective option. Future residential and commercial buildings should be fibre-enabled without any exception.
5. Use of wireless 'last mile' would be necessary up to certain proportion. The importance accorded to spectrum in the Draft is a welcome step. However, it is felt that we should aim at achieving utilization of spectrum up to 100 GHz or higher, with suitable incentivized pricing for use of higher frequency bands. Moreover there is need to increase the un-licensed spectrum bands for general use of public.

In order to get some spectrum released from the existing, large wireless users - Government or public sector (e.g. Doordarshan), which may not be fully used or required by them, it is necessary to enforce a realistic spectrum pricing for all usages, which was

envisaged by NTP-99. Enforcing the charges for spectrum from all users would enhance the internal accountability about optimum use of spectrum among such users.

6. Role of Government in inviting or facilitating Foreign Direct Investment should be specified in the policy.
7. Considerable infrastructure has been established by several licencees. To optimally utilize national resources, open access should be permitted in sharing of all infrastructure, passive and active, for wireless, wireline and transmission media etc.
8. The detailed manner in which 'security' would be taken care of by Government needs to be specified in the policy.
9. The Government may identify the areas where enabling support can be extended by the Government to the Telecom Service Providers.
10. The Government may consider declaring the telecom services as specified services sector, so as to get relief from various state Governments / local bodies taxes and concessions on issues concerning right of way.
11. The Government Policy may not be addressing specific technology issues and it may be made technology neutral / agnostic.