



COAI Comments/Additional Comments on Consultation Paper on Review of Terms and Conditions of PMRTS and CMRTS Licenses

At the outset, we thank the Authority for providing us with the opportunity to share the response to this Consultation Paper on Review of Terms and Conditions of PMRTS and CMRTS Licenses.

A summary of our submission is as follows:

1. Close User Group (CUG) Characteristics of the PMRTS license should be retained. Thus, no change is recommended in the scope of the PMRTS service.
2. There should not be any deviation from the spirit and objective behind introducing a Unified Licensing regime. It needs to be ensured that unified framework is applicable to all services / authorizations that are permissible under Unified License.
3. PMRTS providers should not be permitted Internet connectivity with static IP addresses to provide any type of internet services or the roaming voice services.
4. The existing Licensed Service Area (LSA) based authorization criteria for PMRTS license should continue.
5. PMRTS players may be allowed to shift the Base station within the city/authorized service area with just intimation to the WPC and without it being treated as a new site. Though there should not be any change in the geographical coverage area.
6. Shifting of any base station from one place to another place in another service area should not be permitted as that may lead to altering/ extending the geographical coverage area.
7. There is no need to review the requirement of obtaining Wireless Operating License (WOL) by PMRTS providers.
8. Migration of PMRTS/CMRTS providers to spectrally efficient digital technologies should not be mandated.
9. License fees should be uniform across authorizations under Unified Licenses as well as other licensees involved in communication services.



Our Issue -Wise response is as below:

Q1. Whether there is a need to review the terms and conditions of PMRTS License and PMRTS Authorization under Unified License? Kindly provide a detailed response with justifications.?

COAI Response -

1) PMRTS in India is a technology-driven communication service used for various purposes, including public safety, transportation, and business operations. It is akin to a Point to Point or a Point to Group Radio Communications.

2) As per the Chapter XIII of Unified License Agreement the Scope of PMRTS Service is:

The licensee is permitted to provide PMRTS. The PMRTS refers to:

(i) a two-way land mobile service in which users communicate among themselves through a pair of radio frequencies out of a pool in a designated frequency band, assigned to the system using pair of radio frequencies, and

(ii) the pair of frequencies is allocated on placement of call request and returned to the pool on completion of call, and

(iii) communication usually takes place through repeater station (also called base station). Once the user is assigned a channel (a pair of frequencies) by the system, no one else can interfere with the communication.

3) The Scope of the PMRTS service has characteristics of the Close User Group (CUG), the same has also been acknowledged by TRAI vide its Recommendations in 2003. Further, DoT as well in its comments on the requests of the PMRTS Licensees have submitted that *“The PMRT Service is for CUG purpose, and the interconnect is as per existing License Agreement”*.

4) We are of the view that there should not be any change in the scope of the PMRTS service and thus the Close User Group (CUG) Characteristics should be retained. We further submit that the Government should not deviate from the spirit and objective behind introducing a Unified Licensing regime and ensure that unified framework that is applicable to all services / authorizations that are permissible under Unified License.

Q3. Whether PMRTS providers should be permitted Internet connectivity with static IP addresses? Kindly provide a detailed response with justification.

COAI Response:

1) As per the Consultation paper the reasons for the PMRTS providers seeking the internet connectivity with Static IP is:

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- a) Site-to-site networking
 - b) Trunking system backhaul connectivity.
 - c) To have inter-city and intra-city roaming voice calls
 - d) To have all base station sites interconnected within service to offer seamless coverage to user.
- 2) As highlighted above, we would like to submit that there should not be any changes in the scope of the PMRTS services, the CUG characteristics of the PMRTS License should be retained, the spirit and objective behind introducing said authorizations under the UL should continue. Any revision in license conditions of PMRTS providers should not lead to an increase in scope of services, which otherwise would be part of access or other services.
- 3) Thus, we are of the view that the PMRTS providers should not be permitted Internet connectivity with static IP addresses to provide any type of internet services or the roaming voice services. In case they require an internet connection, they may take the Unified Licence (UL) for access service authorization or any other License which allows providing the internet service in its scope.
- 4) The current condition on Network Interconnection under PMRTS authorization under Unified License, which provides that **“there shall be no interconnection among two separately licensed PMRTS systems”** should continue.

Q4. Whether there is a need to review the extant provisions relating to service area for PMRTS Authorization under Unified License? If yes, whether it would be appropriate to grant PMRTS Authorization for three different categories with service area as (a) National Area; (b) Telecom circle/ Metro Area; and (c) Secondary Switching Area (SSA)? Kindly provide a detailed response with justification.

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Q5. Whether there is a need to review the extant provisions relating to the authorized area for use of a particular frequency spectrum to PMRTS providers? If yes, in what manner should these provisions be amended? Kindly provide a detailed response with justification.

COAI Response:

- 1) We are of the view that there is no need to review the extant provisions relating to service area for PMRTS Authorization under Unified License. We recommend that the existing Licensed Service Area (LSA) based authorization criteria for PMRTS license should continue.

Q8. Whether there is a need to review the requirement of obtaining Wireless Operating License (WOL) by PMRTS providers? Kindly provide a detailed response with justification.



COAI Response:

- 1) We are of the view that there is no need to review the requirement of obtaining Wireless Operating License (WOL) by PMRTS providers.
- 2) Wireless Operating License (WOL) is required for the PMRTS providers to avoid any possibility of misuse of establishing, maintaining and operating the stations and also to ensure that the PMRTS services are being provided within the geographical coverage.

Q9. Whether there is a need to review the provisions related to sale, lease and rent of the radio terminals of PMRTS? Kindly provide a detailed response with justification.

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Q10. In case your response to the Q9 is in the affirmative, what kind of changes will be required in PMRTS licenses and Dealer Possession License (DPL) and guidelines? Kindly provide a detailed response with justification

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Q11. Whether there is a need to review the provisions related to import of the radio terminals of PMRTS? Kindly provide a detailed response with justification.

COAI Response:

- 1) We are of the view that there is no need to review the provisions related to sale, lease and rent of the radio terminals of PMRTS and the provisions related to import of the radio terminals of PMRTS.
- 2) Further, no changes are required in the current PMRTS licenses and Dealer Possession License (DPL) and guidelines in this regard.
- 3) We agree with the views of DoT highlighted in the paper that:
 - a) *The PMRTS service providers after acquiring radio terminals either through direct import or buying from DPL holder, can provide these radio terminals to subscribers/ users upon mutually agreed terms and conditions.*
 - b) *The wireless users having valid frequency assignment under Indian Telegraph Act, 1885 can import directly, the permitted number of radio terminals/ wireless equipment.*
 - c) *As per existing rules/ procedure, the PMRTS frequency assignment holder can import the permitted number of terminals as per technical specifications mentioned in WOL against unserviceable terminals, after submitting the destruction certificate/ copy of FIR (in case of loss)/ appropriate proof.*

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4) We believe that the above view of DoT clarifies that the current licensing conditions meet the requirements of the PMRTS providers and there is no need to review the any of the provisions of the PMRTS or Dealer Possession License (DPL).

Q12. Whether there is a need to review the provisions related to replacement of unserviceable network elements of PMRTS? Kindly provide a detailed response with justification

COAI Response:

1) On the need to review the provisions related to replacement of unserviceable network elements of PMRTS, we agree with the views of DoT highlighted in the Consultation paper that:

“Under the valid spectrum assignment for PMRTS, the issue of replacement of radio terminals can be considered, on case-to-case basis, subject to submission of destruction certificates etc. of the defective/obsolete terminals.”

Q14. Whether there is a need to mandate PMRTS providers to migrate to spectrally efficient digital technologies in a time-bound manner? If yes, what should be the time frame for mandatory migration to spectrally efficient digital technologies? Kindly provide a detailed response with justification.

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Q15. In case your response to Q14 is negative, what measures should be taken to nudge and encourage PMRTS providers to migrate to spectrally efficient digital technologies? Kindly provide a detailed response with justification

COAI Response:

- 1) The evolution of technologies is an ongoing process and migration to newer technologies is dependent on various factors.
- 2) In our view, there should not be any mandate on any licensee to migrate to any specific technology. Any regulatory mandate in this regard would end up disturbing the market forces and can cause consumer inconvenience.

Q23. Whether there is a need to mandate CMRTS licensees to migrate to spectrally efficient digital technologies in a time-bound manner? If yes, what should be the time frame for mandatory migration to spectrally efficient digital technologies? Kindly provide a detailed response with justification.



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Q24. In case your response to Q23 is in the negative, what provisions should be made to nudge and encourage CMRTS licensees to spectrally efficient digital technologies? Kindly provide a detailed response with justification.

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Q25. Whether there is any other issue relevant for review of terms and conditions of the CMRTS License? Kindly provide a detailed response with justifications.

COAI Response:

- 1) Please refer to our comments to Q14 and Q15 above.
- 2) We submit that there should not be any mandate on any licensee to migrate to any specific technology.

Q26. Is there a need to review the license fee prescribed for PMRTS/CMRTS? Please justify your answer. If yes, please suggest detailed methodology for arriving at the license fees for PMRTS/CMRTS with justification.

COAI Response:

- 1) License fees should be uniform across authorizations under Unified Licenses as well as other licensees involved in communication services.
- 2) Industry has been seeking reduction in license fee of 8%. If there is any reduction to the licensee fee of 8%, it should be applied uniformly to all authorizations under Unified Licenses as well as other licensees involved in communication services.
