



Tower and Infrastructure
Providers Association

March 17, 2011

Shri Lav Gupta

Principal Advisor (TD)

The Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
Next to Zakir Hussain College
New Delhi – 110 002

Subject: TRAI Consultation Paper No. 3/2011 on “Green Telecommunications”

Dear Sir,

This is in reference to the consultation paper released by the Authority on 'Green Telecommunications'.

We believe that the response and proposal one of the stakeholders reflects a misunderstanding of the facts on the ground. The use of diesel by Telecom Infrastructure players is not voluntary but forced on them since the Electricity Boards (EBs) are unable to meet even a fraction of the demand for power. If the EBs could meet demand, naturally there would be no need for diesel.

There was a time when all of infrastructure investment was made by the public sector in India & was primarily from borrowed funds. Today, private sector is risking its own resources in building urgently needed infrastructure for the country and has already invested over Rs. 100,000 crores towards this task. It is therefore critical that the sector becomes more, not less, friendly to investors.

IP-1 players have brought down the cost of telecom operation through sharing of passive infrastructure, which is a major portion of telecom operator's costs. These savings have furthered the two prime goals of the sector viz. lower tariffs for the common man and enhanced network coverage. Considering the urgency to reach nationwide coverage, the priority is to improve, not hurt the cost structure of IP-1

IP-1 players cannot be held responsible for and penalized for a systemic failure unrelated to their functioning. IP-1 players also assert that communications infrastructure building is a national task where an incentive based approach is most suitable. A penal or vindictive approach is bound to be counterproductive. It will deter serious investors. This will, in turn, hurt those who have waited so long to access telecom infrastructure.

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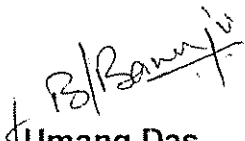
IP-1 players are delivering increasingly high productivity and savings to all stakeholders in the communications sector. Their efforts are delivering low prices benefiting 'Aam-Aadmi', low-income users of voice and data services.

IP-1 players deserve incentive/reward based approaches for encouraging efficiencies that are key to expanding access to telecom services across India, especially, rural areas where they can dramatically improve lives and livelihoods.

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

Kind regards,

Sincerely yours,


Umang Das
Director General