

Sir/Madam,

We have the following comments on the above subject;

A. In Table 2.1 the last column of MAXIMUM ELIGIBLE INCREMENTAL NET SALES# OF MANUFACTURED GOODS OVER THE BASE YEAR (2019-20 may be deleted. This is because if a MSME turns larger in size it should not lose the benefits which make it to become large.

B. The incentives provided under PLI scheme may be linked to encourage the use of energy saving devices, green manufacturing methods or product manual with a commitment to dispose off or reverse recover the e-waste generated by the service providers or individual users. The linking of incentives can be made to understand in the form of green energy use, green energy generation and factory gate drop box to receive rejected handsets from consumers.

C. Value based segmentation for users need to be accurately defined for this sector.

As per format;

1. yes

2. as A above.

3. Procurement support may be provided via GEM or .DGCS&D

4. NO

5. TELECOM PARK CONCEPT DOES NOT EXIST. Media Parks may be established.

6. yes

7. the idea of govt. paying for CAPEX is very new. Banks only provide credit support to purchase CAPEX. Otherwise community hard ware rental facility may be planned for small manufacturers on use basis such as textile and laboratory testing equipment providers.

8. no.

9. re-use rate and re-fill rate of telecom devices are very low in India. this is because the market penetration rate is very low in india. the expenditure power to purchase telecom devices may be delegated to gram panchayats in india.

10. tax holidays are not encouraged for a pure profit making entity.

11. access to bank credit may be facilitated by developing collaterals that can be assigned in favour of lenders.

12. existing tax incentives are fine.

13. Rapid manufacturing production support for all telecom product clusters in India.

14. custom clearance of imported consignments must be automated with RFID bar code readers at sea ports to reduce the waiting time for users..

15. governments do facilitate the use of third party patents by ordinary MSME and pay for the annual royalty tee fees to the inventors on behalf of the user.

16. not more except ensuring band width and signal strength at each village 24/7.

17. as above

regards

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