



To: Mr Shri Sanjeev Kumar Sharma,
Advisor (Broadband and Policy Analysis),
Telecom Regulatory Authority of India,
EMAIL: advbbpa@tra.gov.in

Dated: 10th February 2023

Dear Sir,

GBI RESPONSE TO CONSULTATION PAPER ON LICENCING FRAMEWORK AND REGULATORY MECHANISM FOR SUBMARINE CABLE LANDING IN INDIA

Gulf Bridge International (GBI) owns and operates a submarine telecommunications cable network that interconnects the Arabian Gulf, Europe and India.

GBI notes that the TRAI recognizes the importance of submarine telecommunications cables both to India and globally and is pleased to be able to respond to this consultation.

Attachment 1 contains GBI's response to the questions which directly impact our current business.

GBI thanks the TRAI for the opportunity to provide a response to the consultation and looks forward to seeing the outcome of the consultation.

Please do not hesitate to contact my Chief Technical Officer, Gavin Rea, (EMAIL grea@gbinc.com) if you have any queries.

Yours Sincerely,

pp Cengiz Oztelcan
Chief Executive Officer
Gulf Bridge International



ATTACHMENT 1

GULF BRIDGE INTERNATIONAL RESPONSE TO THE TELECOM REGULATORY AUTHORITY OF INDIA CONSULTATION PAPER ON LICENSING FRAMEWORK AND REGULATORY MECHANISM FOR SUBMARINE CABLE LANDING IN INDIA (CONSULTATION PAPER No 15/2022)

Response to Questions

Q.3 Would an undersea cable repair vessel owned by an Indian entity help overcome the issues related to delays in undersea cable maintenance? Please provide justification for your answer.

GBI believes that having a vessel owned by an Indian entity would only partially overcome the delays in performing repairs to submarine telecommunications cables.

As explained in the 'Permissions for Cable Landing Station (CLS) and laying and repair of submarine cables' section of the TRAI Consultation Paper On Ease of Doing Business in Telecom and Broadcasting Sector (Consultation Paper No.9/2021) the process for repairing submarine telecommunications cables in Indian Waters is very complex, time consuming and costly.

Analysis of recent repairs of the GBI cable in Indian Waters has shown that the Import and Export clearance procedures are now taking between 30 and 50% of the total mobilization period of the Marine Repair Vessel. This equates to between 30% and 40% of the total cost of the repairs. It should also be noted that the 10 to 15 days required for Import Clearance extend the outage time of the cable.

The imposition of Customs Duty + IGST for the consumables onboard and imposition of GST during the time the marine repair vessel is in Indian EEZ and Territorial Waters has significant impact to the cost of repairs. These costs are not applicable in any other countries where GBI had undertaken repairs.

GBI recommends that the Indian Government reviews the whole process for repairing submarine telecommunications cables in the Indian EEZ and Territorial Waters with the aim of streamlining the process to reduce the outage time to the end customers and making repairs cost effective compared to other countries globally.



GBI's recommended approach would be for the Indian Government to:

- 1) Grant Marine Repair Companies permits in principle to repair cables in Indian Waters
- 2) Minimise and streamline the process of obtaining any operational permits to 2 to 3 days.
- 3) Allow Marine Repair Vessels to proceed directly to the fault repair location without having to enter an Indian Ports
- 4) Allow Marine Repair Vessels to depart directly from the fault repair location without having to enter an Indian Port.
- 5) Reduce the taxation related to operation of Marine Repair Vessels in Indian Waters.

Having a Undersea Cable Repair Vessel owned by an Indian Entity would maybe reduce some of the issues encountered repairing cables within Indian Waters, however this could introduce issues of its own and GBI's view is that submarine cable owners should be free to choose whom they contract to repair their cables and that the process and regulations that apply to repairs shall be applicable to both Indian and Non-Indian companies equally which will encourage competition.

Developing a 'Maintenance Agreement' approach led by interested cable owners is something that also has its merits and works well in other areas globally.

Finally, GBI would also like to recommend that a coordinated submarine telecommunications cable protection policy is put in place by the Indian Authorities covering but not limited to the following:

- Educating other seabed users of the importance of Submarine Telecommunications Cables and the need to avoid interacting (fishing near, anchoring etc.) with them.
- Introducing penalties/fines for damaging submarine telecommunication cables
- Enforcement of no fishing/anchoring near submarine telecommunication cables
- Improvements in the process of interaction during the planning and installation of seabed assets (cables, pipelines etc)



Q.8 What challenges are being posed by existing telecom licensing and /or any other framework for establishing terrestrial connectivity between different CLSs in India? What are possible solutions to such challenges? Please support your answer with detailed justification.

International carriers are dependent on Indian telecom operators for the terrestrial backhauls from CLS to data centers and customer locations in India. At times the operator's response is delayed and have preferential commercials for some cable consortiums. TRAI should look to establish and streamline the techno-commercial process including standard price lists, lead times, etc equally for all international carriers.

End of Response.