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No: CP-RP-0724

Date:07-Aug-2024

**Q1. For the purpose of granting authorisations under Section 3(1) of the Telecommunications Act, 2023, whether the Central Government should issue an authorisation to the applicant entity, as is the international practice in several countries, in place of the extant practice of the Central Government entering into a license agreement with the applicant entity? In such a case, whether any safeguards are required to protect the reasonable interests of authorized entities? Kindly provide a detailed response with justifications.**

**Ans:** Yes, the Central Government should issue an authorisation to the applicant entity under Section 3(1) of the Telecommunications Act, 2023, aligning with international practices. This approach ensures a more transparent and efficient authorization framework.

**Necessary safeguards to protect the interests of authorized entities may include:**

1. Clear guidelines and criteria for authorization to ensure fairness and transparency.
2. Provisions for periodic review and renewal of authorizations to maintain regulatory compliance.
3. Mechanisms for dispute resolution to address grievances effectively.
4. Regular audits and assessments to ensure compliance with telecommunications laws and regulations.
5. Financial safeguards.

**Q.2 Whether it will be appropriate to grant authorisations under Section 3(1) of the Telecommunications Act, 2023 in the form of an authorisation document containing the essential aspects of the authorisation, such as service area, period of validity, scope of service, list of applicable rules, authorisation fee etc., and the terms and conditions to be included in the form of rules to be made under the Telecommunications Act, 2023 with 38 suitable safeguards to protect the reasonable interests of the authorised entities in case of any amendment in the rules? Kindly provide a detailed response with justifications.**

**Ans:** Granting authorisation in the form of detailed authorisation document Section 3(1) of the Telecommunications Act, 2023 is appropriate and beneficial. This document should include:

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1. **Service area** in which geographical boundaries should be clearly defined.
2. **Period of validity** in which provision for renewal with specific duration should be mentioned.
3. **The scope of the service** should include a detailed description of services offered.
4. **List of applicable** rules where comprehensive list of regulations should be mentioned.
5. **Authorization of fee** should include transparent fee structure.

Suitable safeguards should include.

1. Clear amendment procedures.
2. Stakeholder consultation before rule changes.
3. Transitional provisions for adaptation to new rules.

**Q3. In case it is decided to implement the authorisation structure as proposed in the Q2 above,**

**(a) Which essential aspects of authorisation should be included in authorisation documents?**

**(b) What should be the broad category of rules, under which, terms and conditions of various authorisations could be prescribed?**

**(c) Whether it would be appropriate to incorporate the information currently provided through the extant Guidelines for Grant of Unified License and Unified License for VNO, which included, inter alia, the information on the application process for the license, eligibility conditions for obtaining the license, conditions for transfer/ Merger of the license etc., in the General Rules under the Telecommunications Act, 2023?**

**(d) What could be the broad topics for which the conditions may be required to be prescribed in the form of guidelines under the respective rules?**

**Kindly provide a detailed response with justifications.**

**Ans:** Essential aspects to be included in authorization documents should cover:

1. Service area.

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2. Geographical Area
3. Period of validity
4. Scope of service
5. List of applicable rules and regulations
6. Authorization fee and payment terms
7. Compliance requirements
8. Reporting and audit obligations

Including these aspects ensures clarity, transparency, and consistency in the authorization process, protecting both the regulator's and the authorized entities' interests.

(b) The broad category of rules under which terms and conditions of various authorizations could be prescribed include:

1. Operational guidelines
2. Technical standards
3. Financial and fee-related regulations
4. Consumer protection measures
5. Environmental and health safety regulations
6. Dispute resolution mechanisms.

These categories ensure comprehensive coverage of all necessary areas, facilitating effective regulation and safeguarding the interests of all stakeholders.

(c) Yes, it would be appropriate to incorporate the information from the extant Guidelines for Grant of Unified License and Unified License for VNO into the General Rules under the Telecommunications Act, 2023. This ensures continuity, clarity, and ease of transition for entities familiar with the current guidelines.

Incorporating existing guidelines ensures continuity, leverages established practices, and facilitates a smooth transition to the new authorization structure.

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(d) Broad topics for conditions in the form of guidelines under respective rules include:

1. Application process and documentation requirements
2. Eligibility criteria for obtaining authorizations
3. Conditions for transfer and merger of authorizations
4. Service quality and performance standards
5. Consumer grievance redressal mechanisms
6. Penalties and sanctions for non-compliance.

**Q.4 In view of the provisions of the Telecommunications Act, 2023, what safeguards are required to be put in place to ensure the long-term regulatory stability and business continuity of the service providers, while at the same time making the authorisations and associated rules a live document dynamically aligned with the contemporary developments from time to time? Kindly provide a detailed response with justifications.**

**Ans:** To ensure long-term regulatory stability and business continuity of service providers, the following safeguards should be put in place:

1. We need to establish a regulatory body dedicated to continuously monitoring and updating telecommunications policies.
2. Implement a flexible regulatory framework for periodic reviews and updates.
3. Create a robust stakeholder consultation process.
4. Ensure transparency in regulatory processes.
5. Provide clear guidelines for transitional periods.
6. Establish mechanisms for dispute resolution and appeals.

These safeguards will help maintain a stable regulatory environment, encourage investment, and ensure the sector adapts to future developments.

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**Q5. In addition to the service-specific authorisations at service area level, whether there is a need for introducing a unified service authorisation at National level for the provision of end-to-end telecommunication services with pan-India service area under the Telecommunications Act, 2023? Kindly justify your response.**

Ans: In addition to the service-specific authorizations at the service area level, there is indeed a need for introducing a unified service authorization at the national level for the provision of end-to-end telecommunication services with a pan-India service area under the Telecommunications Act, 2023. The justification for this need is detailed below:

1. Administrative Efficiency:

- **Simplification:** A unified national authorization will streamline the regulatory framework by reducing the necessity for multiple service-specific authorizations. This will minimize administrative burdens on both regulatory authorities and service providers.
- **Consistency:** It will ensure uniform regulatory requirements and standards across the country, eliminating inconsistencies and confusion that may arise from regional regulatory variations.

2. Enhanced Market Entry and Competition:

- **Ease of Entry:** Simplified authorization processes will lower entry barriers for new market players, promoting greater competition in the telecom sector. This is expected to lead to increased innovation, better service quality, and competitive pricing for consumers.
- **Scalability:** Telecom operators will be able to scale their operations more efficiently on a national level without navigating different regulatory environments for each service area.

3. Economic Benefits:

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- **Cost Reduction:** Unified authorization will reduce compliance costs associated with obtaining and maintaining multiple licenses. The savings realized can be passed on to consumers through lower prices or reinvested in network expansion and service improvement.
  - **Investment Incentives:** A predictable and clear regulatory framework at the national level will attract more investments in the telecom sector, both domestic and international, by reducing regulatory risks and providing greater certainty.
4. **Technological Advancements:**
- **Network Integration:** National-level authorization will facilitate the development and integration of nationwide networks, including advanced technologies such as 5G, ensuring seamless connectivity and interoperability across regions.
  - **Innovation:** Streamlined regulatory processes will accelerate the adoption of new technologies and services, fostering innovation within the telecom sector.
5. **Potential Challenges and Mitigation:**
- **Regulatory Oversight:** Ensuring effective regulatory oversight at a national level can be challenging due to the country's size and diversity. This can be mitigated by enhancing the capabilities of national regulatory bodies and establishing clear guidelines and compliance mechanisms.
  - **Regional Needs and Variations:** Different regions may have unique needs that require specific regulatory attention. While maintaining a unified authorization, the regulatory framework can include provisions for regional variations to address local conditions without fragmenting the overall licensing structure.

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- **Implementation Transition:** Transitioning from a service-specific to a unified authorization system may involve complexities. This can be managed through a phased implementation approach, with clear timelines and support mechanisms for service providers.

The introduction of a unified service authorization at the national level for end-to-end telecommunication services under the Telecommunications Act, 2023, is essential. It will enhance administrative efficiency, foster market competition, reduce costs, and drive technological advancements. Potential challenges can be effectively managed with careful planning and robust regulatory frameworks. The overall benefits of a unified authorization system make it a compelling approach for modernizing and streamlining the telecom regulatory environment in India.

**Q6. In case it is decided to introduce a unified service authorisation at National level for the provision of end-to-end telecommunication services**

- What should be the scope of service under such an authorisation?**
- What terms and conditions (technical, operational, security related, etc.) should be made applicable to Such an authorisation?**
- Would there be a need to retain some of the conditions or obligations to be fulfilled at the telecom circle/ Metro area level for such an authorisation?**
- Should assignment of terrestrial access and backhaul spectrum be continued at the telecom circle/ Metro area level for such an authorisation?**
- Any other suggestion to protect the interest of other authorised entities/ smaller players upon the introduction of such an authorisation. Kindly provide a detailed response with justification.**

Ans: In response to the decision to introduce a unified service authorization at the national level for the provision of end-to-end telecommunication services, the following points address the scope, terms and conditions, and considerations for smaller players:

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**(a) Scope of Service Under Unified Authorization**

The scope of service should include:

- Voice Services (landline and mobile)
- Data Services (internet access, broadband)
- Value-Added Services (SMS, MMS)
- Content Delivery (IPTV, video-on-demand)
- Infrastructure Services (network infrastructure provisioning)
- Emerging Technologies (5G, IoT, M2M communications)

A comprehensive scope ensures all essential telecommunication services are covered, promoting a holistic approach to national telecom development, and enabling the deployment of advanced technologies.

**(b) Terms and Conditions Applicable to Unified Authorization**

**1. Technical Conditions:**

- Compliance with national and international telecom standards.
- Adherence to technical specifications for infrastructure and service delivery.

**2. Operational Conditions:**

- Obligation to provide services nationwide.
- Maintenance of high-quality service standards with regular monitoring.

**3. Security-Related Conditions:**

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- Implementation of robust cybersecurity measures.
- Compliance with national security directives and guidelines.
- Cooperation with government agencies for lawful surveillance and monitoring.

**4. Regulatory Conditions:**

- Adherence to TRAI regulations.
- Periodic submission of operational and financial reports.
- Compliance with tariff regulations and consumer protection norms.

Standardized terms and conditions promote consistency in service quality, regulatory compliance, and security across the country.

**(c) Retaining Conditions or Obligations at Telecom Circle/Metro Area Level**

Yes, retain conditions at the telecom circle/metro area level for:

- Localized service quality monitoring.
- Consumer grievance redressal.
- Compliance with regional regulations and norms.

Retaining certain conditions at the regional level ensures that specific local requirements and issues are adequately addressed, maintaining high service quality and effective local management.

**(d) Assignment of Terrestrial Access and Backhaul Spectrum**

Yes, continue assigning terrestrial access and backhaul spectrum at the telecom circle/metro area level to:

- Optimize spectrum utilization.

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- Reduce interference.
- Address local spectrum needs promptly.

Continued regional spectrum assignment ensures optimal utilization and management of this critical resource, reducing interference and addressing specific local needs.

**(e) Protecting Interests of Other Authorized Entities/Smaller Players**

1. **Fair Competition:** Implement anti-monopoly regulations.
2. **Spectrum Sharing:** Encourage spectrum and infrastructure sharing.
3. **Regulatory Support:** Provide financial and regulatory incentives to small and medium-sized telecom operators.
4. **Innovation Grants:** Establish grants and funding programs for innovation by smaller players.

Protecting the interests of smaller entities ensures a competitive market environment, fostering innovation, and improving services for consumers.

Introducing a unified service authorization at the national level for end-to-end telecommunication services under the Telecommunications Act, 2023, will enhance administrative efficiency, foster market competition, reduce costs, and drive technological advancements. Potential challenges can be managed with careful planning and robust regulatory frameworks. The net benefits of a unified authorization system make it a compelling approach for modernizing and streamlining the telecom regulatory environment in India.

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**Q7. Within the scope of Internet Service authorisation under the Telecommunications Act, 2023, whether there is a need for including the provision of leased circuits/ Virtual Private Networks within its service area? Kindly provide a detailed response with justifications.**

**Ans:** Yes, there is a need to include the provision of leased circuits and Virtual Private Networks (VPNs) within the scope of Internet Service authorization under the Telecommunications Act, 2023. Including leased circuits and VPNs allows internet service providers (ISPs) to offer comprehensive solutions that meet diverse customer needs, ranging from basic internet access to secure, dedicated connections. This inclusion supports businesses that require secure, reliable connectivity between different locations and addresses the increasing demand for secure communication channels due to heightened data privacy concerns and the rise of remote work. A unified authorization for internet services, including leased circuits and VPNs, simplifies the regulatory framework, reducing administrative burdens and streamlining compliance processes for service providers. This promotes market competitiveness by allowing ISPs to offer a wider range of services under a single authorization, fostering innovation and improving service quality. Aligning with international practices, where many countries include leased circuits and VPNs within internet service authorizations, ensures that India remains competitive and up-to-date with global telecom standards. Overall, including leased circuits and VPNs within the scope of Internet Service authorization is essential to support the evolving needs of consumers and businesses, enhance operational efficiency, and promote a competitive and innovative telecom market in India.

**Q8. In case it is decided to enhance the scope of Internet Service authorisation as indicated in the Q7 above,**

**a) What should be terms and conditions (technical, operational, security related, etc.) that should be made applicable on Internet Service authorisation?**

**b) Any other suggestion to protect the reasonable interests of other authorised entities upon such an enhancement in the scope of service. Kindly provide a detailed response with justifications.**

**Ans:** In the event that the scope of Internet Service authorization is enhanced to include the provision of leased circuits and

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Virtual Private Networks (VPNs), several terms and conditions should be applied to ensure effective regulation and service delivery.

1. Technical Conditions should mandate compliance with both national and international technical standards to ensure interoperability and high service quality.
2. Providers must adhere to Quality of Service (QoS) standards, implementing network redundancy and failover mechanisms to maintain service reliability.
3. Operational Conditions should require nationwide service coverage to ensure accessibility across all regions, complemented by robust customer support systems, including localized support offices for addressing grievances.
4. Service Level Agreements (SLAs) should be clearly defined to outline expected performance levels and penalties for non-compliance.

Security-Related Conditions are crucial, including the implementation of strong data protection measures aligned with national cybersecurity laws.

1. VPN services must employ strong encryption protocols to secure data integrity and confidentiality.
2. Providers should also comply with national security guidelines and collaborate with government agencies for lawful interception and monitoring.
3. Regulatory Conditions should include regular audits and compliance reporting to regulatory authorities, adherence to tariff regulations to ensure fair pricing, and the maintenance of appropriate licensing fees to support regulatory oversight.

To protect the interests of other authorized entities, several measures should be considered.

1. Fair Competition must be ensured by implementing anti-monopoly regulations to prevent market dominance by a few

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large players, and by regulating spectrum access to avoid undue advantages.

2.Support for Smaller Entities can be provided through financial incentives, grants, and infrastructure sharing agreements to reduce operational costs and support market entry. Additionally, Consumer Protection should be prioritized by mandating transparency in service terms and pricing, and by establishing robust grievance redressal mechanisms to address consumer complaints effectively.

Moreover, Innovation and Development should be encouraged through initiatives such as research and development support for smaller players and the creation of a regulatory sandbox to allow testing of new services and technologies with regulatory support. These measures will ensure a balanced and competitive telecom environment, fostering growth and innovation while protecting the interests of all stakeholders involved.

**Q9. Whether there is need for merging the scopes of the extant National Long Distance (NLD) Service authorization and International Long Distance (ILD) Service authorization into a single authorisation namely Long-Distance Service authorisation under the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.**

**Ans:** Yes, there is a need to merge the scopes of the extant National Long Distance (NLD) Service authorization and International Long Distance (ILD) Service authorization into a single Long-Distance Service authorization under the Telecommunications Act, 2023. This consolidation would simplify the regulatory framework by streamlining administrative processes, thereby reducing complexity and paperwork for both regulatory authorities and service providers. A unified authorization can enhance operational efficiency, allowing providers to manage both national and international long-distance communications more effectively under a single license. This integration can lead to better network management and cost efficiencies by eliminating the need for separate regulatory compliance for NLD and ILD services. Moreover, merging these authorizations can foster innovation and competition in the telecom sector by encouraging

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providers to develop and offer new, integrated services without the constraints of separate licensing regimes. This can result in improved pricing, service quality, and technological advancements, benefiting consumers and businesses alike. Aligning with global practices, where many countries have adopted integrated long-distance service frameworks, would position India in line with international standards, facilitating smoother international operations and partnerships.

Additionally, a unified Long-Distance Service authorization can enhance market dynamics by allowing new entrants to offer comprehensive long-distance services and ensuring a more competitive environment. It also simplifies regulatory

oversight and compliance, making it easier for authorities to monitor and enforce standards across both national and international long-distance services. Overall, merging NLD and ILD authorizations into a single framework will streamline the regulatory process, improve efficiency, and foster a more competitive and innovative telecom market.

**Q10. In case it is decided to merge the scopes of the extant NLD Service authorization and ILD Service authorization into a single authorisation namely Long-Distance service authorisation under the Telecommunications Act, 2023,**

- (a) What should be the scope of service under the proposed Long Distance Service authorisation?**
- (b) What terms and conditions (technical, operational, security related, etc.) should be made applicable on the proposed Long Distance Service authorisation?**
- (c) Any other suggestions to protect the reasonable interests of other authorised entities upon the introduction of such an authorisation? Kindly provide a detailed response with justifications.**

Ans: If the scopes of the extant National Long Distance (NLD) Service authorization and International Long Distance (ILD) Service authorization are merged into a single Long-Distance Service authorization under the Telecommunications Act, 2023, several key aspects should be addressed.

**Ambit service** The proposed Long-Distance Service authorization should cover a broad range of services. This includes National Long-Distance Services, which encompass voice and data communications across different states and regions

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within India, supporting enterprise solutions and private networks. It should also include International Long-Distance Services, providing voice, data, and multimedia connectivity between India and international destinations. Additionally, the scope should incorporate integrated solutions that bundle national and international long-distance services into comprehensive packages for both businesses and consumers. Value-added services, such as managed network services, cloud-based solutions, and integrated communication platforms, should also be included to offer a complete suite of long-distance communication options.

**Terms and Conditions:** The authorization should include several key terms and conditions. Technically, providers must adhere to national and international standards to ensure service quality and interoperability.

**Quality of Service (QoS)** standards should be defined to cover both national and international services, ensuring reliability, minimal latency, and adequate bandwidth. Providers must implement robust network infrastructure with redundancy and failover capabilities to maintain uninterrupted service. Operationally, the authorization should require nationwide and international service coverage, efficient customer support systems, and clear Service Level Agreements (SLAs) with performance metrics and penalties for non-compliance.

**Security-related conditions** should focus on compliance with data protection regulations and strong encryption standards, particularly for VPN services. Providers should also adhere to national security guidelines and cooperate with authorities for lawful monitoring. Regulatory conditions should include periodic reporting, compliance with tariff regulations, and maintenance of appropriate licensing fees to support sector development.

**Suggestions to Protect Interests:** To protect the reasonable interests of other authorized entities, several measures should be considered. Fair competition should be ensured by implementing anti-monopoly regulations and maintaining transparent spectrum allocation to avoid unfair advantages for dominant players. Support for smaller entities can be provided through financial incentives, grants, and infrastructure sharing agreements, which help reduce costs and facilitate market entry.

**Consumer protection** should be prioritized by mandating transparency in service terms and pricing and establishing robust

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grievance redressal mechanisms. Additionally, fostering innovation and development through research grants and a regulatory sandbox will support technological advancements and allow smaller players to test new services with regulatory backing. These measures will ensure a balanced, competitive, and innovative telecom market, benefiting all stakeholders involved.

**Q.11. Whether there is need for merging the scopes of the extant GMPCS authorization and Commercial VSAT CUG Service authorization into a single authorisation namely Satellite-based Telecommunication Service**

**authorisation under the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.**

**Ans:** There is a compelling need to merge the scopes of the extant Global Mobile Personal Communications by Satellite (GMPCS) authorization and Commercial Very Small Aperture Terminal (VSAT) Closed User Group (CUG) Service authorization into a single authorization, namely Satellite-Based Telecommunication Service authorization, under the Telecommunications Act, 2023.

Merging these authorizations will streamline the regulatory framework, simplifying the compliance requirements for service providers. By consolidating the regulatory processes, the complexity and administrative burden associated with managing separate authorizations will be reduced, benefiting both regulatory authorities and providers. This will lead to more efficient oversight and a more coherent regulatory environment. The unified Satellite-Based Telecommunication Service authorization will encompass a broad spectrum of satellite-based communications, integrating both global personal communications and commercial VSAT services. This comprehensive approach ensures that all satellite communication needs are addressed under one regulatory umbrella, facilitating better coordination and integration of services. Providers will be able to offer a wide range of satellite solutions, including personal mobility and commercial network services, under a single authorization.

Operational efficiency will be enhanced through this merger, as providers will be able to manage their satellite

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communication services more effectively. This integration allows for the optimization of resources and infrastructure, leading to improved service delivery and reduced operational redundancies. Additionally, it supports the deployment and utilization of advanced satellite technologies, such as high-throughput satellites (HTS) and Low Earth Orbit (LEO) constellations, which are critical for the future of satellite communications. Aligning with global standards is another key benefit of merging these authorizations. Many countries have adopted integrated regulatory frameworks for satellite services, reflecting international best practices. By adopting a similar approach, India will position itself competitively in the global satellite communications market and facilitate international cooperation and interoperability.

Furthermore, a single authorization will enhance market access for providers, encouraging competition and potentially leading to better service quality and pricing for consumers. It will also improve access to satellite communications in underserved and remote areas, expanding connectivity and service availability.

Hence merging the GMPCS and Commercial VSAT CUG Service authorizations into a unified Satellite-Based Telecommunication Service authorization will simplify regulation, improve operational efficiency, support technological advancements, align with global standards, and enhance market access and consumer benefits. This consolidation will foster a more effective and forward-looking regulatory environment in the satellite communications sector.

**Q12. In case it is decided to merge the scopes of the extant NLD Service authorization and ILD Service authorization into a single authorisation namely Long-Distance service authorisation under the Telecommunications Act, 2023,**

- (a) What should be the scope of service under the proposed Long Distance Service authorisation?**
- (b) What terms and conditions (technical, operational, security related, etc.) should be made applicable on the proposed Long Distance Service authorisation?**
- (c) Any other suggestions to protect the reasonable interests of other authorised entities upon the introduction of such an authorisation? Kindly provide a detailed response with justifications.**

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Ans: If the scopes of the extant National Long Distance (NLD) Service authorization and International Long Distance (ILD) Service authorization are merged into a single Long-Distance Service authorization under the Telecommunications Act, 2023, several key aspects should be addressed.

**Ambit service** The proposed Long-Distance Service authorization should cover a broad range of services. This includes National Long-Distance Services, which encompass voice and data communications across different states and regions within India, supporting enterprise solutions and private networks. It should also include International Long-Distance Services, providing voice, data, and multimedia connectivity between India and international destinations. Additionally, the scope should incorporate integrated solutions that bundle national and international long-distance services into comprehensive packages for both businesses and consumers. Value-added services, such as managed network services, cloud-based solutions, and integrated communication platforms, should also be included to offer a complete suite of long-distance communication options.

**Terms and Conditions:** The authorization should include several key terms and conditions. Technically, providers must adhere to national and international standards to ensure service quality and interoperability.

**Quality of Service (QoS)** standards should be defined to cover both national and international services, ensuring reliability, minimal latency, and adequate bandwidth. Providers must implement robust network infrastructure with redundancy and failover capabilities to maintain uninterrupted service. Operationally, the authorization should require nationwide and international service coverage, efficient customer support systems, and clear Service Level Agreements (SLAs) with performance metrics and penalties for non-compliance.

**Security-related conditions** should focus on compliance with data protection regulations and strong encryption standards, particularly for VPN services. Providers should also adhere to national security guidelines and cooperate with authorities for lawful monitoring. Regulatory conditions should include periodic reporting, compliance with tariff regulations, and maintenance of appropriate licensing fees to support sector development.

**Suggestions to Protect Interests:** To protect the reasonable interests of other authorized entities, several measures should

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be considered. Fair competition should be ensured by implementing anti-monopoly regulations and maintaining transparent spectrum allocation to avoid unfair advantages for dominant players. Support for smaller entities can be provided through financial incentives, grants, and infrastructure sharing agreements, which help reduce costs and facilitate market entry.

**Consumer protection** should be prioritized by mandating transparency in service terms and pricing and establishing robust grievance redressal mechanisms. Additionally, fostering innovation and development through research grants and a regulatory sandbox will support technological advancements and allow smaller players to test new services with regulatory backing. These measures will ensure a balanced, competitive, and innovative telecom market, benefiting all stakeholders involved.

**Q13. Whether there is a need for merging the scopes of the extant Infrastructure Provider-I (IP-I) and DCIP authorization (as recommended by TRAI) into a single authorisation under the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.**

Ans: Yes, there is a compelling need to merge the scopes of the extant Infrastructure Provider-I (IP-I) and Direct Communication Infrastructure Provider (DCIP) authorizations into a single authorization under the Telecommunications Act, 2023.

Here is the detailed justification

**1. Enhanced Regulatory Efficiency:** Merging IP-I and DCIP authorizations into a single framework would streamline regulatory oversight, reducing the complexity associated with managing multiple authorizations. A unified authorization would simplify the compliance process for infrastructure providers and make it easier for regulatory authorities to monitor and enforce regulations. This simplification would enhance the efficiency of regulatory processes and reduce administrative burdens for both providers and regulators.

**2. Improved Infrastructure Integration:** The IP-I and DCIP authorizations cover overlapping areas of infrastructure provision, including network access and facility management. Combining these authorizations would lead to a more

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integrated approach to infrastructure development and deployment. It would facilitate better coordination between different aspects of infrastructure provision, ensuring that all components work together seamlessly to support network operations and service delivery.

**3. Cost Efficiency and Resource Optimization:** A single authorization would help reduce redundancy and overlap in infrastructure development. By consolidating requirements and processes, providers can achieve cost savings through more efficient resource utilization and reduced investment duplication. This cost efficiency can lead to lower operational expenses and potentially lower costs for end-users, benefiting the overall telecommunications ecosystem.

**4. Encouragement of Innovation and Technological Advancement:** A unified authorization can foster innovation by providing a clear and cohesive framework that supports the adoption of new technologies and practices. With a single set of regulations, providers are more likely to invest in advanced infrastructure solutions and innovative technologies, such as high-speed fibre networks and next-generation data centres. This approach can accelerate technological advancement and improve service quality across the sector.

**5. Support for Comprehensive Infrastructure Planning:** The merger would enable more effective planning and development of telecommunications infrastructure. By combining IP-I and DCIP scopes, the regulatory framework can better address the full spectrum of infrastructure needs, including both traditional and emerging technologies. This comprehensive approach supports the strategic planning and deployment of infrastructure that aligns with current and future demands.

**6. Alignment with Global Trends:** Many countries have adopted integrated regulatory approaches for infrastructure provision, reflecting global best practices. Merging IP-I and DCIP authorizations would align India's regulatory framework with these international trends, facilitating greater interoperability and cooperation with global markets. This alignment enhances India's competitive position and supports its integration into the global telecommunications industry.

So, there is a significant need to merge the scopes of the extant IP-I and DCIP authorizations into a single authorization under the Telecommunications Act, 2023. This merger would enhance regulatory efficiency, improve infrastructure

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integration, achieve cost efficiency, encourage innovation, support comprehensive planning, and align with global trends. A unified authorization would streamline processes, optimize resource use, and support the growth and modernization of the telecommunications sector.

**Q14. In case it is decided to merge the scopes of the extant IP-I and DCIP (as recommended by TRAI) into a single authorisation under the Telecommunications Act, 2023,**

**(a) What should be the scope under the proposed authorisation?**

**(b) What terms and conditions should be made applicable to the proposed authorisation? Kindly provide a detailed response with justifications.**

**Ans:** If the decision is made to merge the scopes of the existing Infrastructure Provider-I (IP-I) and Direct Communication Infrastructure Provider (DCIP) authorizations into a single authorization under the Telecommunications Act, 2023, the following considerations should be addressed:

**(a) Scope under the Proposed Authorization:** The scope of the proposed unified authorization should encompass a comprehensive range of infrastructure services that includes:

1. Network Infrastructure Provision
2. Facility Management
3. Service Access
4. Advanced Technologies and Innovations
5. Infrastructure Sharing

A broad and integrated scope ensures that the unified authorization addresses all aspects of infrastructure provision necessary for a modern telecommunications ecosystem. It supports comprehensive infrastructure development, encourages

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innovation, and facilitates efficient resource use.

**(b) Terms and Conditions Applicable to the Proposed Authorization**

The following terms and conditions should be made applicable to the proposed unified authorization:

1. Technical Standards
2. Operational Conditions
3. Security and Data Protection:
4. Regulatory Compliance:
5. Infrastructure Sharing and Access:

These terms and conditions are designed to ensure high standards of service quality, operational efficiency, and security. They promote transparency, encourage infrastructure sharing, and facilitate compliance with regulatory requirements, thereby supporting a robust and competitive telecommunications sector.

**Q15. Whether there is a need for clubbing the scopes of some of the other authorisations into a single authorisation under the Telecommunications Act, 2023 for bringing more efficiency in the operations? If yes, in your opinion, the scopes of which authorisations should be clubbed together? For each of such proposed (resultant) authorisations,**

- (a) What should be the scope of the service?**
- (b) What should be the service area?**
- (c) What terms and conditions (technical, operational, security, etc.) should be made applicable? Kindly provide a detailed response with justification.**

Ans: Yes, there is a potential benefit in clubbing the scopes of certain telecommunications authorizations into a single authorization under the Telecommunications Act, 2023, to enhance operational efficiency. This consolidation can

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streamline regulatory oversight, reduce administrative burdens, and promote more integrated service offerings. Here are some proposed combinations and details for the resultant authorizations:

### **1. Combination of Internet Service Authorization and Virtual Private Network (VPN) Authorization**

Merging the Internet Service and VPN authorizations into a single framework would unify the provision of internet connectivity and secure private network services. The scope of the proposed authorization should encompass the delivery of both **broadband and leased line internet services, alongside secure VPN services** that enable private, encrypted communications for businesses. This integration aligns with the increasing demand for comprehensive network solutions that combine public internet access with private, secure connectivity. The service area for this unified authorization should be national, ensuring that both internet and VPN services are available across the country. The terms and conditions should include adherence to national and international technical standards for both services, clear Service Level Agreements (SLAs) defining performance metrics such as uptime and response times, and stringent security measures to protect data integrity. This approach would simplify compliance, enhance service quality, and provide more efficient and secure network solutions.

### **2. Combination of National Long Distance (NLD) and International Long Distance (ILD) Authorizations**

Integrating NLD and ILD authorizations into a single authorization would streamline the provision of long-distance voice and data services, both domestically and internationally. The scope of this combined authorization should cover national and international voice and data transmission, as well as transit and interconnection services. By merging these authorizations, providers can offer seamless long-distance communication services with reduced operational complexity. The service area should encompass both pan-India and international regions, allowing for comprehensive long-distance connectivity. Terms and conditions should require compliance with technical standards for reliability and quality of service (QoS), clear SLAs specifying performance benchmarks for latency and throughput, and adherence to international regulatory requirements for cross-border communications. This consolidation would enhance operational efficiency,

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simplify regulatory oversight, and support a more integrated long-distance communication framework.

### **3. Combination of Satellite-Based Communication Services and GMPCS Authorizations**

Combining Satellite-Based Communication Services with GMPCS (Global Mobile Personal Communications by Satellite) authorizations would facilitate a more integrated approach to satellite communications. The scope of the proposed authorization should include a wide range of satellite services, such as satellite internet, broadcasting, and remote area connectivity, alongside global mobile communications via satellite. This merger reflects the growing convergence of satellite technologies and the need for comprehensive satellite-based solutions. The service area for this unified authorization should be global, supporting both satellite communications and GMPCS services on an international scale. The terms and conditions should mandate adherence to international satellite communication standards, defined SLAs for service performance, including coverage and reliability, and robust security measures to safeguard data transmitted via satellite networks. This unified approach would support global connectivity, enhance service delivery, and ensure high standards of quality and security.

Merging the scopes of these authorizations into unified frameworks can lead to significant improvements in operational efficiency, regulatory clarity, and service integration. By combining related services such as internet and VPN, NLD and ILD, or satellite and GMPCS, the telecommunications sector can benefit from streamlined processes, reduced duplication of efforts, and more effective regulatory oversight. These integrations would not only enhance service delivery

but also support the sector's growth and modernization in line with evolving technological and market demands.

**Q16. Whether there a need for removing some of the existing authorizations, which may have become redundant?**

**If yes, kindly provide the details with justification.**

**Ans:** Yes, there is a need to evaluate and potentially remove some of the existing telecommunication's authorizations that may have become redundant. Streamlining the regulatory framework by eliminating outdated or overlapping authorizations

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can improve operational efficiency, reduce regulatory complexity, and foster a more agile telecommunications environment. Below are examples of such authorizations and the justification for their removal:

### **1. Outdated VSAT CUG Authorizations**

The authorization for Commercial Very Small Aperture Terminal (VSAT) Closed User Group (CUG) services may have become redundant with the advancements in satellite technology and the increasing availability of broadband services. Modern satellite communication services now encompass a broader range of applications, including high-throughput satellites and more versatile broadband solutions. By doing so, the evolution of satellite technology has rendered specific VSAT CUG authorizations less relevant, as contemporary satellite services offer more comprehensive and flexible solutions. Removing this authorization would streamline the regulatory framework and align it with current technological advancements, reducing administrative burdens and avoiding overlap with other satellite communication services.

### **2. Redundant Fixed-Line Local Exchange Authorizations**

Authorizations specifically for fixed-line local exchanges might be redundant in an era where telecommunications networks are increasingly converging and focusing on integrated service delivery, including VoIP and mobile communications. By this, the shift towards digital and integrated communication solutions has diminished the need for separate fixed-line local exchange authorizations. Consolidating these into broader, more flexible authorization categories would reduce regulatory complexity and better reflect the current state of telecommunications infrastructure, which increasingly relies on digital and converged technologies.

### **3. Legacy NLD and ILD Authorizations**

The traditional National Long Distance (NLD) and International Long Distance (ILD) authorizations might be considered redundant with the integration of these services into a unified long-distance service authorization.

With the increasing convergence of domestic and international long-distance services, maintaining separate authorizations for NLD and ILD can create unnecessary complexity. A unified long-distance service authorization would streamline regulatory processes, reduce administrative overhead, and better support integrated service delivery across national and

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international boundaries.

#### **4. Separate GMPCS and Satellite Communication Authorizations**

The Global Mobile Personal Communications by Satellite (GMPCS) authorization and general satellite communication authorizations could be seen as redundant, given the broad scope of modern satellite services that cover both GMPCS and other satellite-based communications.

The merging of GMPCS with broader satellite communication authorizations would simplify the regulatory framework and address the convergence of satellite technologies. This integration would reflect the evolving nature of satellite communications, where distinct categories of service are becoming less relevant. It would also streamline regulatory oversight and reduce the complexity associated with managing separate authorizations.

Therefore, removing redundant or outdated authorizations can enhance regulatory efficiency, reduce complexity, and better align the regulatory framework with current technological and market realities. By evaluating and consolidating or eliminating authorizations that have become obsolete or overlapping, the telecommunications sector can benefit from a more streamlined and effective regulatory environment. This approach supports the modernization of the sector, facilitates innovation, and ensures that regulatory frameworks are aligned with contemporary technological advancements and service delivery models.

**Q17. Whether there is a need for introducing certain new authorisations or sub-categories of authorisations under the Telecommunications Act, 2023? If yes,**

**(a) For which type of services, new authorisations or sub-categories of authorisations should be introduced?**

**(b) What should be the respective scopes of such authorisations?**

**(c) What should be the respective service areas for such authorisations? 59**

**(d) What terms and conditions (general, technical, operational, Security, etc.) should be made applicable for such authorisations? Kindly provide a detailed response with justifications.**

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Ans: Yes, introducing certain new authorizations or sub-categories of authorizations under the Telecommunications Act, 2023, could be beneficial to address emerging technologies and service models. The evolving landscape of telecommunications necessitates a more nuanced regulatory framework to accommodate advancements and new service paradigms. Here is a detailed response with justifications for potential new authorizations:

**(a) Types of New Authorizations or Sub-Categories:**

1. **5G Network Infrastructure Provider Authorization:** The deployment of 5G networks represents a significant technological advancement, requiring specific regulatory frameworks to address the unique aspects of 5G infrastructure, such as high-frequency spectrum and dense network deployment.
2. **Internet of Things (IoT) Services Authorization:** IoT services are expanding rapidly, with diverse applications requiring a tailored regulatory approach. This authorization would facilitate the growth of IoT ecosystems and ensure that services meet technical and security standards specific to IoT.
3. **Cloud Services and Edge Computing Authorization:** The rise of cloud computing and edge computing necessitates a dedicated regulatory framework to address the specific requirements of these services, such as data storage, processing, and security.

**(b) Scope of Each Authorization:**

1. **5G Network Infrastructure Provider Authorization:**
  - **Scope:** This authorization should cover the deployment, operation, and maintenance of 5G network infrastructure, including base stations, small cells, and related equipment. It should also encompass spectrum management, network planning, and integration with existing infrastructure.
2. **Internet of Things (IoT) Services Authorization:**

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- **Scope:** This authorization should cover the provision of IoT services, including device connectivity, data transmission, and management platforms for IoT applications. It should address various IoT use cases, such as smart cities, industrial IoT, and consumer IoT solutions.

**3. Cloud Services and Edge Computing Authorization:**

- **Scope:** This authorization should cover the provision of cloud computing services, including Infrastructure as a Service (IaaS), Platform as a Service (PaaS), and Software as a Service (SaaS), as well as edge computing services that bring computational resources closer to end-users for improved performance.

**(c) Service Areas for Each Authorization:**

**1. 5G Network Infrastructure Provider Authorization:**

- **Service Area:** The authorization should cover national and potentially regional service areas, depending on the scale of the 5G deployment. It should align with spectrum licensing and operational requirements to ensure comprehensive coverage.

**2. Internet of Things (IoT) Services Authorization:**

- **Service Area:** The authorization should cover both national and localized areas, depending on the specific IoT applications. For instance, urban IoT solutions might have city-wide coverage, while industrial IoT might be site-specific.

**3. Cloud Services and Edge Computing Authorization:**

- **Service Area:** The authorization should include national coverage, with considerations for data center locations and edge computing nodes. It should ensure that cloud and edge services are available across different regions to support varied user needs.

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**(d) Terms and Conditions for Each Authorization:**

**1. 5G Network Infrastructure Provider Authorization:**

- **General Terms:** Compliance with national and international regulations for spectrum use and infrastructure deployment.
- **Technical Conditions:** Adherence to 5G technical standards, including network performance metrics, spectrum efficiency, and interoperability.
- **Operational Requirements:** Clear guidelines for network planning, deployment timelines, and maintenance.
- **Security:** Robust measures for securing network infrastructure and data, including encryption and access controls.

**2. Internet of Things (IoT) Services Authorization:**

- **General Terms:** Compliance with IoT-specific regulations and industry standards.
- **Technical Conditions:** Requirements for device connectivity, data transmission protocols, and interoperability.
- **Operational Requirements:** SLAs defining performance standards for connectivity, data handling, and service availability.
- **Security:** Implementation of security protocols to protect IoT devices and data, including secure communication channels and data protection measures.

**3. Cloud Services and Edge Computing Authorization:**

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- **General Terms:** Adherence to regulations for cloud and edge services, including data privacy and cross-border data transfer rules.
- **Technical Conditions:** Standards for cloud service delivery, performance metrics, and edge computing capabilities.
- **Operational Requirements:** SLAs for uptime, data management, and service reliability.
- **Security:** Comprehensive security measures for cloud infrastructure and edge computing, including data encryption, access controls, and compliance with data protection regulations.

So, by introducing new authorizations or sub-categories under the Telecommunications Act, 2023, is essential to address the specific needs of emerging technologies and service models. By establishing dedicated frameworks for 5G infrastructure, IoT services, and cloud/edge computing, the regulatory environment can support innovation, ensure service quality, and maintain robust security standards. These measures will help streamline operations, align with global trends, and foster a more dynamic and responsive telecommunications sector.

**Q18. In view of the provisions of the Telecommunications Act, 2023 and technological/ market developments, -**

- (a) What changes (additions, deletions, and modifications) are required to be incorporated in the respective scopes of service for each service authorisation with respect to the corresponding authorizations under the extant Unified License?**
- (b) What changes (additions, deletions, and modifications) are required to be incorporated in the terms conditions (General, Technical, Operational, Security, etc.) associated with each service authorisation with respect to the corresponding authorizations under the extant Unified License? Kindly provide a detailed response with justifications.**

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**Ans: (a) Changes to Scopes of Service**

**1. Broadband Service Authorization:**

- **Additions:** Include provisions for gigabit-speed services and advanced fiber-to-the-home (FTTH) technologies.
- **Deletions:** Remove outdated definitions related to legacy technologies such as dial-up services.
- **Modifications:** Update to encompass emerging technologies like 5G fixed wireless access.

**2. Mobile Service Authorization:**

- **Additions:** Incorporate provisions for 5G and future mobile technologies, as well as advanced network slicing capabilities.
- **Deletions:** Eliminate specifications tied to older mobile standards, such as 2G.
- **Modifications:** Adjust to include new spectrum bands and improve network sharing provisions.

**3. Telecom Infrastructure Authorization:**

- **Additions:** Include requirements for green technology and energy-efficient infrastructure.
- **Deletions:** Remove redundant or overlapping infrastructure categories.
- **Modifications:** Update to align with modern practices for shared infrastructure and co-location.

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The proposed changes are necessary to align with technological advancements and market needs. This ensures that service scopes remain relevant and support the deployment of next-generation technologies while removing outdated provisions.

**Q19. In view of the provisions of the Telecommunications Act, 2023 and technological/ market developments,**

**(a) What changes (additions, deletions, and modifications) are required to be incorporated in the respective scopes of service for each service authorisation with respect to the corresponding authorizations under the extant Unified License for VNO? 76**

**(b) What changes (additions, deletions, and modifications) are required to be incorporated in the terms and conditions (General, Technical, Operational, Security, etc.) associated with each service authorisation with respect to the corresponding authorizations under the extant Unified License for VNO? Kindly provide a detailed response with justifications.**

Ans: Changes for VNO Authorizations

(a) Changes to Scopes of Service

**1. Virtual Network Operator (VNO) Authorization:**

- Additions: Include provisions for advanced network services like 5G and IoT connectivity.
- Deletions: Remove scope elements related to outdated network technologies.
- Modifications: Adjust to allow VNOs to leverage new technologies and market opportunities.

As the telecommunications landscape evolves, VNO scopes should be updated to support modern services and technologies. This ensures VNOs can provide relevant and competitive offerings.

(c) Changes to Terms and Conditions

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1. General Terms:

- **Additions:** Introduce terms that reflect new business models and service agreements.
- **Deletions:** Remove terms related to obsolete operational practices.
- **Modifications:** Update to align with current industry standards and practices.

2. Technical Conditions:

- **Additions:** Include requirements for next-generation technologies and performance metrics.
- **Deletions:** Remove conditions that pertain to outdated technologies.
- **Modifications:** Adapt to new technical standards and network requirements.

3. Operational Conditions:

- **Additions:** Specify requirements for operational flexibility and responsiveness.
- **Deletions:** Remove outdated operational requirements.
- **Modifications:** Update to match modern operational practices and network management.

4. Security Conditions:

- **Additions:** Strengthen security requirements to address current threats.
- **Deletions:** Remove outdated security measures.
- **Modifications:** Update to ensure robust protection against contemporary security challenges.

These changes will ensure that VNO authorizations are compatible with new technologies and market demands, enabling

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VNOs to operate efficiently and securely in a rapidly evolving environment.

**Q20. Whether the Access Service VNOs should be permitted to parent with multiple NSOs holding Access Service authorisation for providing wireless access service? If yes, what conditions should be included in the authorisation framework to mitigate any possible adverse outcomes of such a provision? Kindly provide a detailed response with justifications.**

**Ans:** Allowing Access Service Virtual Network Operators (VNOs) to partner with multiple Network Service Operators (NSOs) for providing wireless access services could enhance competition and service flexibility. This approach would enable VNOs to offer more diverse and extensive wireless coverage by leveraging the infrastructure of multiple NSOs, thus potentially improving service quality and expanding market reach.

However, to mitigate possible adverse outcomes, several conditions should be included in the authorization framework. Firstly, **service quality requirements** must be established to ensure that VNOs maintain high standards of performance across all partnered networks. This helps prevent service degradation due to the complexities of managing multiple NSO partnerships.

Secondly, **operational coordination** guidelines should be defined to facilitate seamless integration and management of services across different networks, reducing the risk of conflicts or service interruptions.

Thirdly, it is essential to ensure **regulatory compliance** across all partnerships, making sure that all parties adhere to industry regulations and standards, thereby safeguarding fair competition and consumer protection.

Finally, robust **data management practices** must be implemented to protect customer information and ensure consistent privacy standards across all networks.

These conditions are necessary to address potential challenges and ensure that the benefits of multi-parenting are realized without compromising service quality or regulatory standards. By implementing these safeguards, the regulatory framework can support the growth and innovation of VNOs while maintaining a competitive and fair

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market environment.

**Q21. Considering that there are certain overlaps in the set of services under various authorisations, would it be appropriate to permit service specific parenting of VNOs with Network Service Operators (NSOs) in place of the extant authorisation-specific parenting? Kindly provide a detailed response with justifications.**

**Ans:** Permitting service-specific parenting of VNOs with NSOs could improve service specialization and flexibility. Key considerations include:

1. **Scope of Services:** Clearly define the range of services covered under each VNO-NSO partnership to avoid overlaps.
2. **Quality Assurance:** Implement measures to ensure consistent service quality across different service types.
3. **Regulatory Oversight:** Maintain effective regulatory oversight to manage and monitor service-specific arrangements.

**Justification** Service-specific parenting allows VNOs to specialize and innovate service areas, enhancing market differentiation. It also requires careful regulation to ensure fair competition and high service standards.

**Q22. In view of the provisions of the Telecommunications Act, 2023 and technological/ market developments,**

- (d) **What changes (additions, deletions, and modifications) are required to be incorporated in the respective scopes of service for each service authorisation with respect to the corresponding extant standalone licenses/ authorizations/ registrations/ NOC etc.?**
- (e) **What changes (additions, deletions, and modifications) are required to be incorporated in the terms and conditions (General, Technical, Operational, Security, etc.) associated with each service authorisation with respect to the corresponding extant standalone licenses/ authorizations/ registrations/ NOC etc.? Kindly provide a detailed response with justifications.**

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Ans: (a) **Changes to Scopes of Service**

1. **Internet Service Provider (ISP) Authorization:**

- **Additions:** Include provisions for high-speed broadband and advanced internet services.
- **Deletions:** Remove outdated service types no longer relevant.
- **Modifications:** Update to reflect new technologies and service models.

2. **Telecom Infrastructure Authorization:**

- **Additions:** Include requirements for modern infrastructure practices.
- **Deletions:** Remove obsolete infrastructure requirements.
- **Modifications:** Adapt to current industry standards and practices.

**Justification:** Aligning the scope of service with current market demands and technological advancements ensures that authorizations remain relevant and effective in a rapidly changing environment.

(b) **Changes to Terms and Conditions**

1. **General Terms:**

- **Additions:** Include terms reflecting current business practices and regulatory standards.
- **Deletions:** Remove outdated or redundant terms.
- **Modifications:** Update to match modern regulatory and operational requirements.

2. **Technical Conditions:**

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- **Additions:** Incorporate requirements for new technologies and performance standards.
- **Deletions:** Remove conditions related to outdated technologies.
- **Modifications:** Adjust to reflect current technical standards and practices.

3. **Operational Conditions:**

- **Additions:** Specify requirements for modern operational practices.
- **Deletions:** Remove obsolete operational procedures.
- **Modifications:** Update to align with current industry practices.

4. **Security Conditions:**

- **Additions:** Strengthen security requirements to address current threats.
- **Deletions:** Remove outdated security measures.
- **Modifications:** Update to ensure robust protection against contemporary security challenges.

**Justification:** Updating terms and conditions ensures that they reflect the latest technologies, market practices, and regulatory standards, enhancing the effectiveness and relevance of **service authorizations**.

**Q23. In view of the provisions of the Telecommunications Act, 2023 and market developments, whether there is a need to make some changes in the respective scopes and terms and conditions associated with the following service authorisations, recently recommended by TRAI:**

**(a) Digital Connectivity Infrastructure Provider (DCIP) Authorization (under Unified License)**

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**(b) IXP Authorization (under Unified License)**

**(c) Content Delivery Network (CDN) Registration**

**(d) Satellite Earth Station Gateway (SESG) License If yes, kindly provide a detailed response with justifications in respect of each of the above authorisations.**

**Ans: (a) Digital Connectivity Infrastructure Provider (DCIP) Authorization**

The scope of the DCIP Authorization should be updated to reflect advancements in infrastructure technologies and sustainability practices. This includes incorporating requirements for modern, high-capacity digital infrastructure such as advanced Fiber networks and next-generation data centres. The updated scope should emphasize the need for infrastructure that supports high-speed connectivity and energy efficiency. In terms of terms and conditions, there should be a stronger focus on environmental impact, requiring DCIPs to implement practices that minimize their carbon footprint and promote energy efficiency. Additionally, operational standards should be revised to support the integration of new technologies and ensure that infrastructure deployment meets current best practices and regulatory standards.

**(b) IXP Authorization**

The Internet Exchange Point (IXP) Authorization scope should be expanded to cover modern interconnection technologies, including those that facilitate international peering agreements and high-capacity data transfers. This would ensure that IXPs can support the growing demands of internet traffic and enhance connectivity options. Terms and conditions should be updated to include enhanced security measures and performance metrics that address the increasing complexity and volume of data exchanges. Ensuring robust security protocols and high-performance standards will help maintain the reliability and efficiency of internet traffic management.

**(c) Content Delivery Network (CDN) Registration**

The scope of the CDN Registration should be revised to encompass advanced CDN technologies, including edge caching and distributed content delivery. This change is necessary to keep pace with evolving content delivery requirements and technological advancements. Terms and conditions for CDN Registration should include stringent requirements for content

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security and delivery performance, ensuring that CDNs can reliably handle high traffic volumes and protect against cyber threats. Updating these conditions will support the effective delivery of content and enhance user experience.

**(d) Satellite Earth Station Gateway (SESG) License**

For the Satellite Earth Station Gateway (SESG) License, the scope should be updated to incorporate next-generation satellite technologies and services, such as high-throughput satellites and low Earth orbit constellations. This will ensure that the authorization remains relevant in the context of advancing satellite communications. Terms and conditions should include enhanced security and operational standards to address the complexities of modern satellite communications and ensure reliable service. These updates will help SESG operators meet current demands and technological challenges in the satellite industry.

These recommendations are aimed at aligning authorizations with technological advancements and market developments. By updating scopes and terms, the regulatory framework can better support the evolving needs of the telecommunications industry, ensure effective service delivery, and maintain high standards for infrastructure, interconnection, content delivery, and satellite communications.

**Q24. In view of the provisions of the Telecommunications Act, 2023 and market developments, any further inputs on the following issues under consultation, may be provided with detailed justifications:**

**(a) Data Communication Services Between Aircraft and Ground Stations Provided by Organizations Other Than Airports Authority of India.**

**(b) Review of Terms and Conditions of PMRTS and CMRTS Licenses; and (c) Connectivity to Access Service VNOs from more than one NSO.**

Ans: **(a) Data Communication Services Between Aircraft and Ground Stations Provided by Organizations Other Than Airports Authority of India.**

There is a need to establish a clear regulatory framework for data communication services between aircraft and ground

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stations provided by entities other than the Airports Authority of India (AAI). This framework should address licensing requirements, operational standards, and security measures to ensure the reliability and safety of aviation communication services. Such services should be regulated to guarantee that they meet aviation standards and do not interfere with other critical communication systems. Implementing a structured regulatory approach will support the growth of alternative service providers while maintaining high safety and operational standards.

**(b) Review of Terms and Conditions of PMRTS and CMRTS Licenses**

The terms and conditions for Public Mobile Radio Trunked Services (PMRTS) and Commercial Mobile Radio Trunked Services (CMRTS) licenses should be reviewed to reflect current technological advancements and market needs. This includes updating operational and technical standards to accommodate the integration of modern digital communication technologies and enhanced security protocols. The review should also consider the scalability of services and the need for flexibility in operational requirements to support evolving business models and user demands. Ensuring that the terms and conditions align with contemporary practices will help maintain service quality and industry relevance.

**(c) Connectivity to Access Service VNOs from More Than One NSO**

Permitting Access Service VNOs to connect with multiple NSOs can enhance service flexibility and competition. However, this should be managed carefully to prevent potential conflicts and ensure smooth operational integration. The regulatory framework should include clear guidelines on coordination between VNOs and NSOs, establish quality of service requirements, and ensure compliance with all relevant regulations. By setting these conditions, the framework can support the benefits of multi-NSO connectivity while minimizing risks related to service management and regulatory compliance.

**Justification:**

Addressing these consultation issues is essential for adapting the regulatory framework to current technological and market developments. By establishing clear guidelines and updating terms and conditions, the framework will support innovation, ensure service reliability, and maintain high standards across various telecommunications services. This approach will enhance the efficiency and effectiveness of the regulatory environment, fostering a competitive and dynamic industry.

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**Q25. Whether there is a need for introducing any changes in the authorisation framework to improve the ease of doing business? If yes, kindly provide a detailed response with justifications.**

**Ans:** There is a significant need to introduce changes in the authorization framework to enhance the ease of doing business within the telecommunications sector. Streamlining regulatory processes and reducing bureaucratic hurdles can foster a more business-friendly environment, encouraging investment and innovation.

### **1. Simplification of Licensing Procedures**

The current licensing procedures can be complex and time-consuming, involving multiple stages and extensive documentation. Simplifying these processes by consolidating application forms, reducing the number of required approvals, and implementing a single-window clearance system can significantly reduce administrative burdens for businesses. Streamlining these procedures would not only speed up the approval process but also lower compliance costs, making it easier for new and existing players to operate efficiently.

### **2. Digitalization and Automation**

Adopting digital platforms for licensing, reporting, and compliance can enhance operational efficiency. Implementing automated systems for application submissions, status tracking, and regulatory updates can reduce processing times and minimize human errors. A robust digital infrastructure would facilitate real-time communication between regulatory authorities and service providers, ensuring faster resolution of issues and easier management of compliance requirements.

### **3. Flexible Regulatory Framework**

Introducing a more flexible regulatory framework that accommodates emerging technologies and business models is essential. This includes providing clearer guidelines for new service offerings, such as IoT and 5G, and creating provisions for adaptive regulatory practices that can quickly respond to technological advancements. Flexibility in regulations will help businesses adapt to changing market conditions and technological innovations without facing excessive regulatory constraints.

### **4. Streamlined Compliance and Reporting**

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Reducing the frequency and complexity of compliance reporting requirements can ease the operational burden on businesses. Introducing standardized reporting formats and allowing for periodic rather than continuous submissions can help. Additionally, providing clear guidance on compliance obligations and creating support mechanisms for businesses to understand and meet these requirements will contribute to a more manageable regulatory environment.

### **5. Enhanced Stakeholder Engagement**

Regular consultations with industry stakeholders can help identify pain points and areas for improvement in the authorization framework. Engaging with businesses through public consultations, feedback mechanisms, and industry forums will ensure that regulatory changes align with practical needs and challenges faced by the industry. This collaborative approach can lead to more effective and balanced regulatory policies.

### **Justification**

Implementing these changes is crucial for fostering a more conducive business environment in the telecommunications sector. Simplifying licensing procedures, embracing digital tools, and adopting flexible regulatory practices will reduce operational hurdles, encourage investment, and support the growth of innovative services. By making the regulatory framework more responsive and efficient, businesses can operate more effectively, leading to enhanced industry development and competitive market dynamics.

**Q26. In view of the provisions of the Telecommunications Act, 2023 and market/ technological developments, whether there is a need to make some changes in the extant terms and conditions, related to ownership of network and equipment, contained in the extant Unified License? If yes, please provide the details along with justifications.**

**Ans:** In light of the Telecommunications Act, 2023, and recent technological and market developments, there is a need to review and potentially revise the extant terms and conditions related to ownership of network and equipment in the Unified License. These changes are necessary to align regulatory practices with contemporary industry trends and technological advancements.

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### 1. Flexibility in Ownership Structures

The traditional ownership models prescribed in the Unified License often do not accommodate modern, flexible business models. With the rise of virtual network operators (VNOs), cloud-based services, and shared infrastructure models, it is essential to update ownership terms to allow for more diverse and flexible arrangements. This includes recognizing and facilitating co-investment and co-sharing agreements among operators, which can enhance infrastructure efficiency and reduce capital expenditure. Flexibility in ownership structures will support innovative business models and encourage investment in new technologies.

### 2. Incorporation of Shared Infrastructure

Given the increased emphasis on shared infrastructure to optimize resource use and reduce operational costs, the regulatory framework should be updated to better support shared ownership and co-location of network equipment. This involves revising terms to clearly define the conditions under which network infrastructure can be shared, ensuring that it does not compromise service quality or security. Updating these terms will promote collaboration between operators and lead to more efficient use of network resources.

### 3. Technological Upgrades and Equipment Ownership

The rapid evolution of technology necessitates a review of ownership conditions related to network equipment. Current regulations may not adequately address the integration of advanced technologies such as 5G, IoT, and edge computing. The regulatory framework should be updated to support the deployment of next-generation technologies and allow for the ownership of modern, high-performance equipment. This includes revising conditions to facilitate the rapid adoption of new technologies and ensuring that regulatory requirements do not hinder technological advancements.

### 4. Security and Compliance

With the increasing complexity of telecommunications networks, updating ownership terms to enhance security and compliance is critical. This includes introducing stricter security requirements for network equipment and ensuring that ownership and operational practices align with cybersecurity best practices. Enhanced security measures will protect against

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potential threats and ensure that network operators meet current security standards.

### 5. Regulatory Alignment

The revised terms should also ensure alignment with international best practices and standards. This will help maintain competitiveness on a global scale and ensure that the regulatory framework is up to date with international norms. Harmonizing local regulations with global standards will support cross-border operations and improve market accessibility for international players.

Updating the terms and conditions related to ownership of network and equipment is essential for aligning the regulatory framework with current technological advancements and market realities. Flexible ownership structures, support for shared infrastructure, and modernization of equipment regulations will foster innovation, improve operational efficiency, and enhance security. These changes will ensure that the regulatory environment supports the growth and competitiveness of the telecommunications sector while adapting to evolving technological and market conditions.

### Q27. Whether any modifications are required to be made in the extant PMWANI framework to encourage the proliferation of Wi-Fi hotspots in the country? If yes, kindly provide a detailed response with justifications.

Ans: Yes, modifications to the extant Public Wi-Fi Access Network Interface (PMWANI) framework are necessary to encourage the proliferation of Wi-Fi hotspots across the country. These adjustments can address existing barriers and create a more favorable environment for the expansion of Wi-Fi networks.

#### 1. Simplification of Licensing and Registration

One key modification is to streamline the licensing and registration process for Wi-Fi hotspots. Currently, the process may be cumbersome and time-consuming, which can deter potential operators from deploying hotspots. Simplifying these procedures by reducing paperwork, introducing a more straightforward application process, and providing a digital platform for registrations can lower the entry barriers for new players and accelerate the deployment of hotspots.

#### 2. Incentives for Deployment

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To stimulate investment in Wi-Fi hotspots, the framework should include financial and operational incentives. This could involve subsidies or tax breaks for the installation of Wi-Fi infrastructure in underserved or rural areas, as well as grants for innovative technologies that improve network performance and coverage. These incentives will encourage more players to invest in Wi-Fi deployment and expand coverage to areas with limited connectivity.

### **3. Streamlined Spectrum Allocation**

Addressing spectrum allocation issues is another crucial modification. Simplifying and expediting the process for spectrum assignment, particularly for frequencies used in Wi-Fi networks, will reduce delays and costs associated with setting up hotspots. Clear guidelines and faster approval processes for spectrum use will facilitate the expansion of Wi-Fi networks and enhance connectivity.

### **4. Encouragement of Public-Private Partnerships**

Encouraging public-private partnerships can be an effective strategy for expanding Wi-Fi hotspots. The framework should provide clear guidelines and support for collaborations between government bodies and private sector players, facilitating joint efforts to deploy and manage Wi-Fi networks. Such partnerships can leverage the strengths of both sectors to improve network reach and service quality.

### **5. Support for Technology and Standards**

The PMWANI framework should be updated to support the latest Wi-Fi technologies and standards. This includes incorporating provisions for the adoption of advanced Wi-Fi standards like Wi-Fi 6 and future generations. By ensuring that the framework supports cutting-edge technologies, the regulatory environment will promote the deployment of high-performance Wi-Fi hotspots and enhance overall network quality.

### **6. Enhanced Security Measures**

To ensure the secure operation of Wi-Fi hotspots, the framework should include comprehensive security requirements. This involves mandating robust security protocols to protect user data and prevent unauthorized access. Enhanced security measures will build trust among users and encourage more widespread adoption of Wi-Fi services.

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Modifying the PMWANI framework is essential for addressing current barriers and promoting the widespread deployment of Wi-Fi hotspots. Simplified processes, financial incentives, streamlined spectrum allocation, and support for technology advancements will create a more favorable environment for Wi-Fi expansion. Encouraging public-private partnerships and enhancing security will further support the growth of Wi-Fi networks and improve connectivity across the country. These changes will help achieve broader internet access, particularly in underserved areas, and foster a more inclusive digital economy.

**Q28. What should be the broad framework including the specific terms and conditions that should be made applicable for captive authorisations, which are issued on a case-to-case basis? Kindly provide a detailed response with justifications.**

Ans: For the effective management and regulation of captive authorizations issued on a case-to-case basis, it is crucial to establish a broad framework with specific terms and conditions. This framework should ensure that captive networks operate efficiently, comply with regulatory standards, and do not adversely affect public networks. Below is a detailed response outlining the proposed framework and its justifications.

### **1. Scope of Captive Authorizations**

The scope of captive authorizations should be clearly defined to specify that these authorizations are intended for private networks used solely by the licensee or its affiliates. Captive networks are typically set up for internal use, and their scope should be limited to internal communications and operations, ensuring that they do not provide public telecommunications services. The framework should also specify that captive authorizations are not transferable or assignable to other entities without regulatory approval.

### **2. Terms and Conditions**

#### **a. Technical Standards**

Captive networks must adhere to established technical standards to ensure compatibility with existing public networks and

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avoid interference. The technical conditions should include guidelines on network design, equipment standards, and interoperability requirements. These standards will help maintain network performance and ensure that captive networks do not cause disruptions to public services.

#### **b. Operational Requirements**

The operational terms should include requirements for maintaining network security, reliability, and performance. Captive network operators should be required to implement robust security measures, including encryption and access controls, to protect against unauthorized access and data breaches. Additionally, they should establish protocols for regular maintenance, monitoring, and reporting to ensure continuous and reliable network operation.

#### **c. Compliance and Reporting**

Captive authorizations should include provisions for compliance with relevant regulations and reporting requirements. Operators should be required to submit periodic reports on network performance, security incidents, and compliance with technical standards. These reports will allow regulatory authorities to monitor captive networks and ensure that they meet the necessary operational and security standards.

#### **d. Spectrum Usage**

If captive networks require spectrum allocation, the framework should include specific terms for spectrum use, including licensing conditions and frequency management. Captive network operators should be required to use spectrum efficiently and comply with frequency coordination requirements to prevent interference with other services.

#### **e. Restrictions on Resale and Interconnection**

To prevent captive networks from being used for unauthorized commercial activities, the framework should include restrictions on resale and interconnection with public networks. Captive networks should not be used to provide services to third parties or interconnect with public networks without explicit regulatory approval.

#### **f. Environmental and Safety Standards**

Operators should be required to comply with environmental and safety standards related to network infrastructure. This

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includes ensuring that network equipment and facilities meet health and safety regulations and are designed to minimize environmental impact.

By Implementing a comprehensive framework for captive authorizations ensures that these networks operate within a structured and regulated environment. By defining the scope, establishing technical and operational requirements, and setting compliance and reporting standards, the framework will promote efficient network management, enhance security, and prevent potential misuse. These measures will help maintain the integrity of public telecommunications networks while allowing organizations to use captive networks for their internal needs. The framework will also support regulatory oversight and ensure that captive networks do not adversely impact public services or the broader telecommunications ecosystem.

**Q29. What amendments are required to be incorporated in the terms and conditions of authorisations for providing telecommunications services using satellite-based resources considering the policy/ Act in the Space Sector? Kindly provide a detailed response with justifications.**

Ans: In view of recent developments in the Space Sector policy and the Telecommunications Act, 2023, it is essential to update the terms and conditions for authorisations that involve satellite-based telecommunications services. These amendments will ensure alignment with national space policies, support the integration of new technologies, and address the evolving landscape of satellite communications. Below are the recommended amendments along with their justifications.

#### 1. Alignment with Space Sector Policy

##### a. Licensing and Regulatory Framework

The terms and conditions should be updated to align with the new space sector policy, which may include changes to licensing procedures, spectrum allocation, and regulatory oversight. This alignment ensures that satellite-based telecommunications services are regulated in harmony with national space policy objectives and international agreements.

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#### **b. Coordination with Space Agencies**

Amendments should include provisions for coordination with national space agencies, such as the Indian Space Research Organization (ISRO). This will ensure that satellite operations are integrated with national space missions and policies, including satellite launches, space traffic management, and compliance with space debris mitigation guidelines.

### **2. Spectrum Management and Coordination**

#### **a. Spectrum Allocation and Use**

The framework should specify updated procedures for spectrum allocation and use, reflecting current policies and international standards. This includes clear guidelines on the frequency bands available for satellite communications and mechanisms for avoiding interference with other services. The terms should also address coordination with international bodies to ensure that spectrum use is harmonized globally.

#### **b. Frequency Coordination**

Operators should be required to follow updated frequency coordination processes to prevent interference between satellite systems and other communications networks. The framework should include detailed procedures for coordinating satellite frequencies with other operators and regulatory authorities.

### **3. Technology and Innovation**

#### **a. Support for New Technologies**

The terms should accommodate advancements in satellite technology, such as Low Earth Orbit (LEO) constellations, high-throughput satellites (HTS), and integrated space and terrestrial networks. This includes provisions for the deployment of advanced technologies and the use of new satellite systems to enhance service capabilities.

#### **b. Capacity and Coverage Requirements**

The framework should specify capacity and coverage requirements to ensure that satellite-based services meet quality standards and provide comprehensive coverage. This includes guidelines for service area definitions, bandwidth requirements, and performance metrics.

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#### 4. Operational and Security Standards

##### a. Security and Resilience

Updated terms should include enhanced security and resilience measures to protect satellite networks from cyber threats and physical interference. This includes requirements for encryption, access controls, and incident response protocols to safeguard the integrity and confidentiality of satellite communications.

##### b. Disaster Recovery and Continuity

The framework should incorporate disaster recovery and continuity planning requirements to ensure that satellite services remain operational during emergencies and disruptions. This includes provisions for backup systems, redundancy, and recovery plans.

#### 5. Compliance and Reporting

##### a. Compliance with Space Policy

Operators should be required to comply with space policy regulations, including guidelines on space debris management, satellite deorbiting procedures, and environmental impact assessments. The terms should ensure that operators adhere to national and international standards for space operations.

##### b. Reporting and Monitoring

The terms should specify reporting and monitoring requirements for satellite-based services, including regular updates on satellite performance, service quality, and compliance with regulatory standards. This will enable effective oversight and ensure that operators meet their obligations.

By Amending the terms and conditions for satellite-based telecommunications authorisations is crucial for aligning with the latest space sector policies and technological advancements. These changes will ensure that satellite services are regulated effectively, support innovation, and address emerging challenges in satellite communications. By incorporating updated procedures for spectrum management, security, and operational standards, the framework will foster a robust and resilient satellite communications sector that meets national and international expectations.

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**Q30. Whether the provisions of any other Policy/ Act in the related sectors need to be considered while framing terms and conditions for the new authorisation regime? If yes, kindly provide a detailed response with justification.**

Ans: When framing terms and conditions for a new authorization regime, it is crucial to consider the provisions of existing policies and acts in related sectors to ensure comprehensive and coherent regulation. Here's a detailed response with justification:

#### **Considerations for Related Policies/Acts**

##### **1. Consistency with Existing Laws:**

- **Justification:** Ensuring consistency with existing laws helps avoid conflicts and overlaps. For instance, if the new authorization regime pertains to environmental regulations, it should align with laws such as the Environmental Protection Act or Forest Conservation Act. This ensures that the new regime complements rather than contradicts existing regulatory frameworks.

2. **Integration with Sector-Specific Regulations:** Different sectors often have specialized regulations. For example, in forestry, regulations under the Forest Act and Wildlife Protection Act must be considered to harmonize with new authorization terms related to forest management or land use. This integration prevents legal ambiguities and ensures comprehensive governance.

3. **Compliance with National and International Standards:** Adhering to national and international standards (such as ISO standards) can enhance the credibility and effectiveness of the new authorization regime. For example, if the new regime involves industrial processes, compliance with safety and environmental standards is critical.

4. **Alignment with Economic Policies:** The new regime should be aligned with economic policies and trade regulations to avoid unintended economic impacts. For instance, if the regime affects business operations, it should consider provisions of the Companies Act or Trade and Commerce regulations to ensure economic viability and compliance.

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5. **Consideration of Public Health and Safety Regulations:** If the new authorization regime impacts public health or safety, it must integrate provisions from health and safety regulations. For example, if the regime involves chemicals or hazardous materials, it should comply with regulations under the Hazardous Substances Act or Occupational Safety and Health Act.
6. **Incorporation of Local and Regional Policies:** Local and regional policies may have specific requirements or conditions that need to be addressed. For instance, urban planning and local land use regulations should be considered if the authorization regime involves land development or construction.

#### **Example Scenario: Forestry Authorization Regime**

If the new authorization regime is related to forestry, consider the following:

- **Forest Conservation Act:** Ensure that the terms and conditions align with conservation requirements to prevent deforestation and habitat destruction.
- **Wildlife Protection Act:** Incorporate provisions to protect wildlife and their habitats within forested areas.
- **Environmental Protection Act:** Include measures to mitigate environmental impact and ensure sustainable practices.
- **National Forest Policy:** Align with national strategies for forest management and conservation.

#### **Example Scenario: Telecommunications Authorization Regime**

If the new authorization regime is related to telecommunications, consider the following:

- **Indian Telegraph Act, 1885:** Ensure that the terms and conditions align with the foundational legal framework governing telecommunication services in India.

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- **Information Technology Act, 2000:** Incorporate provisions related to cybersecurity, electronic governance, and data protection.
- **Telecom Regulatory Authority of India (TRAI) Act, 1997:** Include measures to comply with regulatory guidelines on service quality, tariffs, and consumer protection.
- **Unified License (UL) Framework:** Align with the licensing regime that covers a range of telecom services, ensuring comprehensive regulatory compliance.
- **Personal Data Protection Bill, 2019:** Integrate data privacy and protection measures to safeguard user information and comply with emerging data protection standards.

Incorporating provisions from related policies and acts is essential for creating a robust and coherent authorization regime. It ensures legal consistency, operational effectiveness, and alignment with broader regulatory and policy frameworks, ultimately leading to more effective governance and compliance.

**Q31. What conditions should be made applicable for the migration of the existing licensees to the new authorisation regime under the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.**

Ans: The migration of existing licensees to the new authorisation regime under the Telecommunications Act, 2023, should be governed by the following conditions:

1. **Eligibility Confirmation:** Existing licensees must demonstrate that they meet the eligibility criteria outlined in the new regime. This includes providing documentation of financial stability, technical capability, and compliance history.
2. **Application Submission:** Licensees should be required to submit a formal application for migration, including a detailed plan outlining how they will comply with the new regime's requirements.

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3. **Compliance Audit:** A comprehensive audit should be conducted to ensure that licensees are in full compliance with their current licensing terms. This audit will assess operational, technical, and financial aspects.
4. **Migration Fee:** A reasonable fee structure should be established for the migration process, reflecting the administrative costs incurred by the regulatory body.
5. **Transition Period:** A defined transition period should be provided, allowing licensees ample time to align their operations with the new regulatory requirements. This period should be sufficient to address any operational or technical changes needed.
6. **Technical Upgrades:** Licensees must undertake necessary technical upgrades to meet the new standards stipulated in the authorisation regime, ensuring service quality and interoperability.
7. **Documentation and Reporting:** Licensees must submit all relevant documentation, including updated business plans, technical specifications, and compliance reports, to support their migration application.

Implementing these conditions ensures a seamless and orderly transition to the new authorisation regime. It guarantees that all licensees meet the updated regulatory standards, promoting fairness and consistency across the industry. Moreover, this structured approach protects the interests of consumers by maintaining service continuity and quality during the transition period.

**Q32. What procedure should be followed for the migration of the existing licensees to the new authorisation regime under the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.**

Ans: The procedure for migrating existing licensees to the new authorisation regime under the Telecommunications Act, 2023 should include the following steps:

1. Notification

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2. Information Sessions
3. Application Process
4. Submission Deadline
5. Review and Approval
6. Interim Compliance
7. Final Verification
8. Issuance of New Authorisation

This procedure ensures a systematic and transparent migration process. The formal notification and information sessions help in effectively communicating the new requirements and procedures to all stakeholders, reducing the risk of confusion and non-compliance. A clear application process and submission deadline streamline the transition, ensuring that all applications are processed efficiently. The review and approval stage guarantees that only those entities meeting the new standards are authorised, maintaining high regulatory standards. Interim compliance requirements ensure that there is no lapse in adherence to regulatory norms during the transition. Final verification acts as a safeguard, confirming that all conditions are met before new authorisations are issued. This structured approach facilitates a smooth and orderly transition, ensuring continuity and stability in the telecommunications sector.

**Q33. Do you agree that new guidelines for the transfer/ merger of authorisations under the Telecommunications Act, 2023 should be formulated after putting in place a framework for the authorisations to be granted under the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.**

Ans: Yes, it is essential to formulate new guidelines for the transfer/merger of authorisations under the Telecommunications.

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Act, 2023, after establishing the framework for the authorisations to be granted under the same Act. This approach ensures consistency and clarity, as the authorisation framework will define the foundational terms, conditions, and requirements for obtaining authorisations, which the transfer/merger guidelines can then align with. By first establishing the authorisation framework, we ensure that all legal and regulatory aspects are clearly defined, preventing potential conflicts or inconsistencies that could arise if guidelines were developed independently. Moreover, this sequential approach allows for operational efficiency, as the transfer/merger guidelines can be designed to streamline the process, reducing administrative burdens. Stakeholders will have greater confidence in the regulatory process, knowing that the guidelines are based on a well-defined framework, enhancing trust and encouraging compliance. Additionally, this method offers flexibility and adaptability, allowing the regulatory authority to gather feedback and observe the practical impacts of the authorisation framework before finalising the transfer/merger guidelines. This ensures that the guidelines are robust and responsive to real-world conditions. Lastly, this approach provides enhanced oversight and control, allowing the regulatory authority to establish clear and enforceable rules for transfers and mergers, thus reducing the risk of regulatory loopholes. In conclusion, formulating the transfer/merger guidelines after the authorisation framework is a strategic approach that promotes a stable, effective, and transparent regulatory environment.

**Q34. Whether there is a need to formulate guidelines for deciding on the types of violations of terms and conditions which would fall under each 89 category as defined in the Second Schedule of the Telecommunications Act, 2023? If yes, kindly provide a detailed response with justifications.**

Ans: Yes, there is a need to formulate guidelines for deciding on the types of violations of terms and conditions that would fall under each category as defined in the Second Schedule of the Telecommunications Act, 2023. Establishing clear guidelines is crucial for ensuring consistency, fairness, and transparency in the enforcement of the Act. These guidelines would provide a structured framework for categorizing violations based on their severity, impact, and nature, which in turn would facilitate uniform application of penalties and remedial measures.

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Formulating such guidelines ensures consistency in enforcement across different cases, thereby preventing arbitrary or biased decisions. By clearly defining the types of violations and their respective categories, regulators can apply the law uniformly, ensuring that similar violations are treated in a similar manner, regardless of the entities involved. This approach enhances the fairness of the regulatory process and builds trust among stakeholders. Moreover, detailed guidelines help in maintaining transparency in the regulatory framework. When stakeholders are aware of the specific violations and the categories they fall under, they can better understand the consequences of non-compliance. This transparency aids in compliance by providing clear expectations and reducing the ambiguity around regulatory requirements.

Furthermore, categorising violations based on their severity and impact allows for proportional enforcement. Minor infractions can be addressed with less severe penalties, while serious violations that pose significant risks to the telecommunications infrastructure, public safety, or consumer rights can be met with stringent measures. This proportional approach ensures that the response to violations is appropriate and justifiable, enhancing the credibility of the regulatory authority. In addition, these guidelines support the regulatory authority in maintaining a proactive stance towards compliance. Clear definitions of violations and their categories enable the authority to identify potential risks and address them promptly. This proactive approach helps in preventing minor issues from escalating into major violations, thereby protecting the integrity of the telecommunications sector.

**Q35. Are there any other inputs/ suggestions relevant to the subject? Kindly provide a detailed response with justifications.**

**Ans:** Yes, there are additional inputs and suggestions relevant to the subject that could further enhance the effectiveness and implementation of the Telecommunications Act, 2023. These include establishing a robust public consultation mechanism, incorporating technological advancements, enhancing consumer protection measures, and ensuring continuous regulatory updates.

- **Public Consultation Mechanism:** Establishing a robust public consultation mechanism is crucial for inclusive and

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transparent policymaking. By actively engaging with stakeholders—including industry players, consumer groups, and technical experts—the regulatory authority can gather diverse perspectives and insights. This approach ensures that the regulations are well-informed and balanced, addressing the needs and concerns of all parties involved. Public consultations also enhance the legitimacy and acceptance of regulatory decisions, fostering a collaborative regulatory environment.

- **Incorporating Technological Advancements:** The telecommunications sector is rapidly evolving, driven by advancements in technology such as 5G, the Internet of Things (IoT), and artificial intelligence. It is essential to incorporate provisions within the Act that allow for the integration of these emerging technologies. By proactively addressing technological changes, the regulatory framework can remain relevant and effective in managing new challenges and opportunities. This adaptability is crucial for fostering innovation and maintaining the competitiveness of the telecommunications sector.
- **Enhancing Consumer Protection Measures:** Consumer protection is a fundamental aspect of telecommunications regulation. Strengthening consumer protection measures within the Act can ensure that consumers' rights are safeguarded against unfair practices and service deficiencies. This could include stricter regulations on data privacy, clearer guidelines on service quality standards, and mechanisms for efficient dispute resolution. Enhanced consumer protection measures build consumer trust and confidence in the telecommunications services, which is vital for the sector's sustainable growth.
- **Continuous Regulatory Updates:** Given the dynamic nature of the telecommunications industry, it is essential to establish a mechanism for continuous regulatory updates. This could involve periodic reviews of the regulatory framework to assess its effectiveness and relevance in the face of industry changes. By institutionalizing regular updates, the regulatory authority can ensure that the regulations remain current and capable of addressing emerging issues. This proactive approach helps in maintaining a stable and predictable regulatory environment.
- **Capacity Building and Training:** Investing in capacity building and training for regulatory staff and stakeholders

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is vital for the effective implementation of the Telecommunications Act, 2023. Continuous professional development programs can enhance the regulatory authority's capability to handle complex regulatory challenges and enforce compliance effectively. Training programs for industry stakeholders can also promote better understanding and adherence to regulatory requirements, fostering a culture of compliance within the sector.

- **Inter-Agency Collaboration:** Promoting inter-agency collaboration can enhance the regulatory framework's effectiveness. Telecommunications often intersects with other sectors such as finance, cybersecurity, and public safety. Establishing formal collaboration mechanisms with relevant agencies can ensure a holistic approach to regulation, addressing cross-sectoral issues more efficiently. This collaboration can lead to more comprehensive and coherent regulatory policies, benefiting the broader ecosystem.

Implementing these suggestions will ensure a more comprehensive, adaptable, and inclusive regulatory framework. A public consultation mechanism enhances legitimacy and stakeholder engagement, while incorporating technological advancements keeps the regulations relevant. Enhanced consumer protection measures build trust, and continuous regulatory updates ensure the framework's dynamism. Capacity building improves regulatory effectiveness, and inter-agency collaboration fosters a holistic approach. These measures collectively contribute to a robust and forward-looking telecommunications regulatory environment, capable of meeting current and future challenges effectively.

**Q.36 In case it is decided to introduce a unified service authorisation for the provision of end-to-end telecommunication services with pan-India service area, what should be the:**

1. **Ans:** Application Fee:

- Recommendation: Set to zero or a minimal amount

Reasoning: Like the application processes for GST or PAN Cards, a negligible or zero fee for applications will help lower barriers to entry and make it easier for all service providers to apply.

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**2. Entry Fee:**

- Recommendation: Eliminate entry fees entirely
- Reasoning: Dropping entry fees for all types of authorizations removes unnecessary barriers and promotes a more open and competitive market environment.

**3. Bank Guarantee:**

- Recommendation: Discard the requirement
- Reasoning: Removing the bank guarantee requirement will free up funds for service providers and reduce financial strain, making it simpler for both new and existing operators.

**4. Definitions of GR, APGR, and AGR:**

- Recommendation: Simplify definitions and exempt terrestrial services from licensing fees for the next 10 years or until a pre-agreed target is met.
- Reasoning: Define services using GST return based HSN codes. Services that aren't subject to license fees can be identified through these codes. Payments to other service providers should be tracked as credits, similar to GST forms, ensuring a transparent and straightforward process.

**5. Authorization Fee:**

- Recommendation: Keep the fee low with a tiered structure
- Reasoning:

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- Fee Structure:
  - AGR up to INR 25 Cr.: No fee
  - AGR between INR 25 Cr. and INR 50 Cr.: 1% fee
  - AGR between INR 50 Cr. and INR 100 Cr.: 2% fee
  - AGR above INR 100 Cr.: 3% fee
- Example: For a company with an AGR of INR 125 Cr.:
  - The first INR 25 Cr.: No fee
  - Next INR 25 Cr. (from INR 25 Cr. to INR 50 Cr.): 1% of INR 25 Cr.
  - Next INR 50 Cr. (from INR 50 Cr. to INR 100 Cr.): 2% of INR 50 Cr.
  - Remaining INR 25 Cr. (above INR 100 Cr.): 3% of INR 25 Cr.

#### 6. Minimum Net Worth:

- Recommendation: No minimum net worth requirement for terrestrial authorizations; restrict applications to private limited or LLP entities.
- Reasoning: This approach lowers financial entry barriers and ensures that only properly structured entities (private limited or LLP) can apply. Separate minimum net worth requirements can be set for resource-based authorizations if needed.

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This revised approach aims to simplify regulations, reduce financial barriers, and support a more accessible and competitive environment for terrestrial services.

**Q37. In case it is decided to enhance the scope of Internet Service authorization as indicated in the Q7 above, what should be the:**

- (i) **Amount of application processing fees**
- (ii) **Amount of entry fees provisions of bank guarantees**
- (iii) **Definitions of GR, ApGR and AGR**
- (iv) **Rate of authorisation fee**
- (v) **Minimum equity and net worth of the Authorised entity Please support your response with proper justification.**

Ans: (i) **Amount of Application Processing Fees**

**Recommendation:** Set to zero or a nominal amount (e.g., INR 50,000)

Keeping the application processing fee low or zero will encourage more participants to apply without imposing a financial burden, similar to the approach for terrestrial services.

(ii) **Amount of Entry Fees and Bank Guarantees**

**Recommendation:**

- **Entry Fees:** Abolish entry fees.
- **Bank Guarantees:** Remove requirement.

**Justification:** Eliminating both entry fees and bank guarantees will reduce financial barriers and facilitate greater market participation. This approach aligns with the goal of minimizing entry barriers for new and existing Internet Service

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Providers (ISPs).

### (iii) Definitions of GR, ApGR, and AGR

**Recommendation:** Simplify definitions as follows:

- **GR (Gross Revenue):** Total revenue from all Internet services before any deductions.
- **ApGR (Adjusted Gross Revenue):** Gross Revenue adjusted for non-Internet related revenues and specific allowed deductions.
- **AGR (Adjusted Gross Revenue):** Revenue used to calculate specific regulatory fees, incorporating ApGR adjustments.

**Justification:** Simplified definitions will ensure clarity and ease in compliance. Using GST return-based HSN codes can streamline the identification of revenues and deductions, making the process more transparent and manageable.

### (iv) Rate of Authorization Fee

**Recommendation:** Keep minimal with a tiered structure:

- **Fee Structure:**
  - AGR up to INR 25 Cr.: Exempt
  - AGR between INR 25 Cr. and INR 50 Cr.: 1% fee
  - AGR between INR 50 Cr. and INR 100 Cr.: 2% fee
  - AGR above INR 100 Cr.: 3% fee

A tiered fee structure ensures that fees are proportional to the revenue size, making it more equitable. The exemption for the first INR 25 Cr. of AGR encourages smaller players, while the graduated rates ensure that larger entities contribute fairly.

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**(v) Minimum Equity and Net Worth of the Authorized Entity**

Setting these thresholds ensures that entities have sufficient financial resources to operate responsibly while not imposing excessive barriers. This approach balances accessibility with the need for financial stability.

By applying these recommendations, the enhanced scope of Internet Service authorization will be more accessible, encouraging greater market participation and ensuring a fair regulatory environment.

**Q38. In case it is decided to merge the scopes of the extant NLD Service authorization and ILD Service authorization into a single authorization namely Long-Distance Service authorization under the Telecommunications Act, 2023, what should be the: -**

- (i) Amount of application processing fees
- (ii) Amount of entry fees
- (iii) Provisions of bank guarantees
- (iv) Definitions of GR, ApGR and AGR
- (v) Rate of authorisation fee
- (vi) (Minimum equity and networth of the Authorised entity Please support your response with proper justification.

**Ans:** If the scopes of the existing National Long Distance (NLD) Service authorization and International Long Distance (ILD) Service authorization are merged into a single Long Distance Service authorization under the Telecommunications Act, 2023, the following recommendations can be made:

**(i) Amount of Application Processing Fees**

This fee should be sufficient to cover the costs associated with processing applications while remaining affordable for applicants. It should reflect the complexity of assessing a combined NLD and ILD authorization.

**(ii) Amount of Entry Fees**

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A moderate entry fee ensures that only serious applicants enter the market, contributing to the financial stability of the regulatory body without discouraging potential entrants. This fee range balances accessibility with the financial commitment required to provide long-distance services.

**(iii) Provisions of Bank Guarantees**

A bank guarantee in this range will provide adequate financial security for regulatory compliance while not being excessively burdensome. It acts as a safeguard against potential non-compliance or operational issues.

**(iv) Definitions of GR, ApGR, and AGR**

**Recommendation:**

- **GR (Gross Revenue):** Total revenue from long-distance services, including both NLD and ILD, before deductions.
- **ApGR (Adjusted Gross Revenue):** GR adjusted for revenues not related to long-distance services and specific allowed deductions.
- **AGR (Adjusted Gross Revenue):** A further adjusted figure used for calculating regulatory fees, incorporating relevant ApGR adjustments.

Simplifying and standardizing these definitions will ensure consistency and clarity in revenue reporting and fee calculation. This approach helps in managing combined NLD and ILD revenues effectively.

These thresholds ensure that the service provider has a solid financial foundation to support long-distance operations, encompassing both NLD and ILD services. This balance helps in maintaining operational stability and regulatory compliance.

These recommendations aim to create a balanced and fair framework for the merged Long Distance Service authorization, facilitating market entry while ensuring financial and operational reliability.

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**Q39. In case it is decided to merge the scopes of the extant GMPCS authorization and Commercial VSAT CUG Service authorization into a single authorization namely Satellite-based Telecommunication Service authorization under the Telecommunications Act, 2023, what should be the: -**

- i. Amount of application processing fees**
- ii. Amount of entry fees**
- iii. Provisions of bank guarantees**
- iv. Definitions of GR, ApGR and AGR**
- v. Rate of authorisation fee (vi) Minimum equity and net worth of the Authorised entity Please support your response with proper justification.**

**Ans:** The overall fee should be sufficient to cover the costs associated with processing applications while remaining affordable for applicants. It should reflect the complexity of assessing a combined NLD and ILD authorization. Rest all the recommendations have been discussed in above questions of chapter 3.

**Q40. In case you are of the opinion that there is a need for clubbing the scopes of some other authorisations into a single authorisation under the Telecommunications Act, 2023 for bringing more efficiency in the operations, what should be the:**

- (i) Amount of application processing fees**
- (ii) Amount of entry fees**
- (iii) Provisions of bank guarantees**
- (iv) Definitions of GR, ApGR and AGR**
- (v) Rate of authorisation fee**
- (vi) Minimum equity and net worth of the Authorised entity Please support your response with proper justification.**

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**Ans:** The overall fee should be sufficient to cover the costs associated with processing applications while remaining affordable for applicants. It should reflect the complexity of assessing a combined NLD and ILD authorization. Rest all the recommendations have been discussed in above questions of chapter 3.

**Q41. In case you are of the opinion there is a need to introduce certain new authorisations or sub-categories of authorisations under the Telecommunications Act, 2023, what should be the:**

- (i) **Amount of application processing fees**
- (ii) **Amount of entry fees**
- (iii) **Provisions of bank guarantees**
- (iv) **Definitions of GR, ApGR and AGR**
- (v) **Rate of authorisation fee**
- (vi) **Minimum equity and net worth of the Authorised entity Please support your response with proper justification.**

**Ans:** The overall fee should be sufficient to cover the costs associated with processing applications while remaining affordable for applicants. It should reflect the complexity of assessing a combined NLD and ILD authorization. Rest all the recommendations have been discussed in above questions of chapter 3.

**Q42. What should be the amount of application processing fees for the various service authorisations including VNOs, other than the merged/clubbed/new service authorisations? Please provide your response for each of the service authorisation separately.**

**Ans:** Minimal or exemption.

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**Q43. Whether the amount of entry fee and provisions for bank guarantee for various service authorisations including VNOs, other than the merged/clubbed/new service authorisations, should be:**

- i. kept the same as existing for the various service authorisations under the UL/UL(VNO) license.
- ii. kept the same as recommended by the Authority for the various service authorisations under the UL/UL(VNO) license, vide its Recommendations dated 19.09.2023.
- iii. or some other provisions may be made for the purpose of Entry Fee and Bank Guarantees Please support your response with proper justification separately for each authorisation.

**Ans:** Kindly refer to question 36.

**Q44. Whether there is a need to review any of the other financial conditions for the various service authorisations including VNOs, other than the merged/clubbed/new service authorisations? Please provide your response for each service authorisation separately with detailed justification.**

**Ans:**

**1. Voice Service Authorization (VSA):**

- Recommendation: Review minimum financial requirements.

The current financial thresholds may be high relative to the market and technological advancements. Lowering these could encourage more entrants and competition in the voice service sector.

**2. Data Service Authorization (DSA):**

- Recommendation: Assess capital and net worth requirements.

With the increasing importance of data services, the financial conditions should reflect current infrastructure costs and

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market realities, ensuring they are neither too restrictive nor too lenient.

**3. Unified License (UL):**

- Recommendation: Reevaluate the overall financial conditions.

A unified license covers multiple services, and financial conditions should be adjusted to reflect the broad scope of operations. Ensuring that the requirements are balanced will support efficient service provision across different telecom segments.

**4. Virtual Network Operator (VNO):**

- Recommendation: Examine financial entry barriers.

VNOs often face significant operational and interconnection costs. Adjusting financial conditions could facilitate better market access while ensuring that VNOs have adequate resources to operate effectively.

**5. Satellite-based Service Authorization:**

- Recommendation: Review the minimum financial thresholds.

Satellite services involve high capital expenditures. Financial requirements should be updated to match the current technological and market landscape, ensuring they are realistic for new and existing providers.

**6. Telecom Infrastructure Provider (TIP):**

- Recommendation: Reassess net worth and financial stability criteria.

Infrastructure providers require substantial investment. The financial conditions should ensure that TIPs have the necessary resources while supporting new entrants who are essential for expanding telecom infrastructure.

These reviews will ensure that financial conditions are aligned with current market conditions and operational needs.

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**Q45. In case it is decided to merge the scopes of the extant IP-I Registration and the Digital Connectivity Infrastructure Provider (DCIP) authorization into a single authorization under the Telecommunications Act, 2023, what should be the: -**

- i. Amount of application processing fees**
- ii. Amount of entry fees**
- iii. Any other Fees/Charge**
- iv. Minimum equity and net worth etc. of the Authorised entity. Please support your response with proper justification.**

Ans: Discussed in the above questions.

**Q46. For MNP license and CMRTS authorisation, should the amount of entry fee and provisions of bank guarantees be:**

- i. kept same as existing for the respective license/authorisation.**
- ii. kept the same as recommended by the Authority vide its Recommendations dated 19.09.2023.**
- iii. or some other provisions may be made for the purpose of Entry Fee and Bank Guarantees Please support your response with proper justification separately for each authorisation.**

Ans: Should be as minimal as possible.

**Q47. For other standalone licenses/ registrations/ authorisations/ permissions, should the existing framework for financial conditions be continued? Please provide detailed justification.**

Ans: The existing framework for financial conditions for standalone licenses/registrations/authorizations/permissions should be reviewed and potentially updated. Rapid changes in technology and market dynamics can render current financial

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conditions outdated, impacting operational costs and investment attractiveness. Adjusting these conditions ensures they reflect current industry realities, encourage investment, and align with international best practices, fostering a competitive and sustainable market environment. Regular updates help balance entry barriers with the need for financial stability and regulatory compliance.

**Q48. If answer to question above is no, what should be the new/revised financial requirement viz. bank guarantee/ entry fee/ processing fee/ authorisation fees/ registration fees or any other charge/ fees? Please provide detailed justification in support of your response for each other license/ registration/ authorisation/ permission separately.**

Ans: Recommendations provided in above questions.

**Q49. In case of the merged M2M-WPAN/WLAN service authorisation, what should be the processing fees or any other applicable fees/ charges. Please support your response with proper justification.**

Ans: No proper figure however minimal charges as possible.

**Q50. In the interest of ease of doing business, is there a need to replace the Affidavit to be submitted with quarterly payment of license fee and spectrum usage charges with a Self-Certificate (with similar content)? Please justify your response.**

Ans: Yes, replacing the affidavit with a self-certificate for quarterly payments of license fees and spectrum usage charges is beneficial for ease of doing business. A self-certificate simplifies the compliance process by eliminating the need for notarization and legal formalities associated with affidavits, thereby reducing administrative burdens and associated costs. This shift can speed up processing times and lower expenses for both businesses and regulators. Additionally, self-certification encourages accountability by relying on the entity's assurances, which can enhance trust and ensure diligent reporting. Aligning with modern practices, this change would streamline regulatory processes and make compliance more

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efficient.

**Q51. Is there a need to revise/ modify/simplify any of the existing formats of Statement of Revenue Share and License Fee for each license/authorisation (as detailed at Annexure 3.2)? In case the answer to the question is yes, please provide the list of items to be included or to be deleted from the formats along with detailed justification for the inclusion/deletion.**

Ans: Yes, the existing formats of the Statement of Revenue Share and License Fee should be revised and simplified. The updated formats should include a detailed revenue breakdown by service type to enhance transparency and accuracy, as well as automated calculation fields to reduce errors and streamline the reporting process. A compliance checklist should be added to ensure all necessary data is included, and standardized HSN codes should be incorporated for consistency with GST reporting. Conversely, redundant data fields and manual calculation sections should be removed to simplify the formats and minimize administrative burdens. Eliminating overly detailed subcategories that do not significantly impact financial reporting will further streamline the process, making it more user-friendly and efficient.

**Q52. In case of a unified service authorisation for the provision of end-to-end telecommunication services with pan-India service area, what should be the format of Statement of Revenue Share and License Fee for each of these authorisations? Please support your response with justification.**

Ans: For a unified service authorization providing end-to-end telecommunication services with a pan-India service area, the format of the Statement of Revenue Share and License Fee should be designed to ensure clarity and accuracy. The format should include a detailed revenue breakdown by service segments (such as voice, data, and value-added services) and, if relevant, by geographic regions. This ensures transparent tracking of different revenue streams. The license fee calculation should clearly outline the total revenue, applicable license fee rate, and total fee due, including any deductions or adjustments. Similarly, the revenue share calculation should specify the total revenue and the revenue share rate, with a

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clear total amount due. Additionally, the format should include a compliance checklist to ensure all required information is provided and a certification statement by an authorized signatory to confirm the accuracy of the reported figures. Automated calculation fields should be incorporated to reduce manual errors and enhance efficiency.

**Q53. In case the scope of Internet Service authorization is enhanced, what should be the format of Statement of Revenue Share and License Fee for each of these authorisations? Please support your response with justification.**

Ans: If the scope of Internet Service authorization is enhanced, the format of the Statement of Revenue Share and License Fee should be updated to reflect the expanded service offerings while maintaining clarity and precision. The revised format should include a detailed breakdown of total revenue, specifying income from new and existing internet services, as well as ancillary services like managed and cloud services. This ensures a comprehensive view of all revenue streams. The calculation sections should clearly outline the total revenue, the applicable license fee rate, and any adjustments or deductions, providing transparency in how fees are determined. For revenue share calculations, the format should specify the total revenue and applicable revenue share rate, ensuring straightforward reporting. Additionally, a compliance checklist should be included to verify that all required information is provided, along with a certification statement by an authorized signatory to confirm the accuracy of the data. Automated calculation fields should be incorporated to reduce manual errors and streamline the reporting process.

**Q54. In case of merged extant NLD Service authorization and ILD Service authorization into a single authorization namely Long-Distance Service authorization, what should be the format of Statement of Revenue Share and License Fee for each of these authorisations? Please support your response with justification.**

Ans: For the merged Long Distance Service authorization, integrating the extant NLD (National Long Distance) and ILD (International Long Distance) Service authorizations, the format of the Statement of Revenue Share and License Fee should be updated to ensure clarity and efficiency. The format should begin with a detailed revenue breakdown that separates

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income from both NLD and ILD services, allowing for precise tracking and calculation of fees based on these distinct revenue streams. The license fee calculation should clearly outline the total revenue, apply the appropriate fee rates for both NLD and ILD services, and include any necessary adjustments or deductions. This transparency ensures accurate fee determination. Similarly, the revenue share calculation should detail the total revenue and applicable rates for both service categories, facilitating straightforward reporting. The format should also include a compliance checklist to confirm that all required data is submitted and a certification statement by an authorized signatory to verify the accuracy of the information provided. Incorporating automated calculation fields will reduce manual errors and streamline the reporting process.

**Q55. In case of merged extant GMPCS authorization and Commercial VSAT CUG Service authorization into a single authorization namely Satellite-based Telecommunication Service authorization, what should be the format of Statement of Revenue Share and License Fee for each of these authorisations? Please support your response with justification.**

Ans: For the merged GMPCS (Global Mobile Personal Communications by Satellite) authorization and Commercial VSAT (Very-Small-Aperture Terminal) CUG (Closed User Group) Service authorization into a single Satellite-based Telecommunication Service authorization, the format of the Statement of Revenue Share and License Fee should include a comprehensive revenue breakdown that separates income from GMPCS and VSAT services. This allows for precise calculation of fees based on the distinct revenue streams. The license fee calculation should clearly outline total revenue, apply the relevant fee rates for both service types, and include any necessary adjustments or deductions. Revenue share calculations should specify the rates applicable to each service type and the total due.

**Q56. In case you have proposed to club the scope of some of other authorizations OR introduce certain new authorisations/ sub-categories of authorisations, what should be the format of Statement of Revenue Share and License Fee for each of these authorisations? Please support your response with justification.**

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Ans: If the scope of some authorizations is merged or new authorizations or sub-categories are introduced, the format for the Statement of Revenue Share and License Fee should be adapted accordingly. It should include a detailed revenue breakdown for each authorization or sub-category, ensuring transparency in tracking and calculating fees. The license and revenue share calculations should reflect the specific rates and adjustments applicable to each new or merged authorization. Automated calculation fields and compliance checklists should be incorporated to simplify reporting and enhance accuracy. This approach ensures that the format accommodates changes while maintaining clarity and efficiency.

**Q57. Whether there is a need to review/ simplify the norms for the preparation of annual financial statements (that is, the statements of Revenue and License Fee) of the various service authorizations under UL, UL(VNO) and MNP licenses? Please give detailed response with proper justification for each authorization/license separately.**

Ans: There is a need to review and simplify the norms for preparing annual financial statements for various service authorizations under UL (Unified License), UL(VNO) (Unified License for Virtual Network Operators), and MNP (Mobile Number Portability) licenses. Simplification could involve standardizing formats, reducing complexity in revenue and fee reporting, and incorporating automated tools to minimize manual errors. For UL and UL(VNO) licenses, streamlining revenue and fee reporting could improve accuracy and reduce administrative burdens. For MNP licenses, simplifying financial statements would enhance clarity in tracking porting-related revenues and fees.

**Q58. In case of migration, how the entry fee already paid by the company be calculated/ prescribed for the relevant authorisation(s)? Please provide detailed justification in support of your response.**

Ans: In case of migration, the entry fee already paid should be prorated based on the period remaining under the current authorization and the scope of the new authorization. The calculation should consider the proportion of time elapsed and any differences in scope or coverage between the old and new authorizations. This approach ensures a fair adjustment of the entry fee based on the value received and the new authorization's requirements.

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**Q59. Should the application processing fee be applicable in case of migration. In case the response is yes, what should be amount of application processing fee? Please give reason(s) in support of your answer.**

Ans: The application processing fee should be applicable in the case of migration to cover administrative costs. The amount should be reasonable and reflect the complexity of processing the migration request.

**Q60. What should be terms and conditions of security interest which Government may prescribe? Please provide detailed response.**

Ans: Terms and conditions for security interest prescribed by the Government should include clear requirements for the form and amount of security, the conditions under which it can be claimed, and the process for its release. The security should be sufficient to cover potential liabilities and should be held in a secure manner, with provisions for periodic review and adjustment based on the authorization's scope and risk factors.

**Q61. Whether there are any other issues/ suggestions relevant to the fees and charges for the authorisations to provide telecommunication services? The same may be submitted with proper explanation and justification.**

Ans: Additional issues to consider include simplifying fee structures, reducing the frequency of fee payments, and incorporating flexible payment terms to accommodate varying financial conditions of service providers. Reviewing and updating fee categories to align with technological advancements and market conditions can also improve the regulatory framework's effectiveness and fairness.

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