

Counter Comments

TRAI CP Dated 08-12-2021

1.Introduction:

1.1The acronym 5G is appearing in three places in the CP. It is appearing in the beginning, around middle and towards the end of the documents.

1.2. As per PIB Delhi posting dated 04-05-2021 DoT has approved 5G trials. However there is no reference to these trials and their out come in the CP.

1.3.Although acronym '5G' is occurring 12 times in NDCP ref-(MINISTRY OF COMMUNICATIONS (Department of Telecommunications) NOTIFICATION New Delhi, the 22nd October, 2018 NATIONAL DIGITAL COMMUNICATIONS POLICY-2018 (MINISTRY OF COMMUNICATIONS AND INFORMATION TECHNOLOGY (Department of Telecommunications), however, definition of 'Broadband' still is confined to 512kbps ref-(MINISTRY OF COMMUNICATIONS AND INFORMATION TECHNOLOGY (Department of Telecommunications) NOTIFICATION New Delhi, the 18th July, 2013 S.O. No. 4-4/2009-Policy-I).

Approval logics/preconditions:

1.4. The combination of words like 'if yes', 'if----- eligible' are indicative of some decision about choice/approval logic before going to next process in a flow chart. These are appearing '18' times.'7' times in the CP. Primarily the same are used to judge the eligibility of the entity desirous of getting a license of a specific type.

1.5. CP discusses the processes of the grant of Various licenses/permissions/registration for various services by Ministry of Information and Broadcasting, Department of Telecommunications, Department of Space & Ministry of Electronics and Information Technology, Ministry of Power.

Availability of suitable references documents/measures:

1.6. To arrive at the right decision the updated references are a prerequisite irrespective of online/offline process.

Online/offline process:

1.7. The various flow charts shown in the CP are only indicative in nature both containing offline/online processes.

1.8. Offline processes are predominant in the flowchart up to judging the suitability of the applicant for a license and remaining processes are mainly online.

1.9. The status indicated above(**1.8**) has been reached by a study of various flow charts provided in CP, various reforms done in Ministry of Information and Broadcasting, Department of Telecommunications, Department of Space & Ministry of Electronics and Information Technology, Ministry of Power for speeding up the processes of the grant of various licenses/permissions/registration for various services.

Questions & Answers

Q1. Whether the present system of licenses/permissions/registrations mentioned in para no. 2.40 or any other permissions granted by MIB, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:

a. Simple, online and well-defined processes

b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any

c. Precise and well-documented timelines along with the possibility of deemed approval

d. Well-defined and time bound query system in place.

e. Seamless integration and approvals across various ministries/departments with the end-to-end online system

f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of license/permission/registration Give your suggestions with justification for each license/permission/registration separately with detailed reasons along with examples of best practices if any.

Q2. Whether the present system of licenses/permissions/registrations mentioned in para no. 3.81 or any other permissions granted by DoT, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:

a. Simple, online and well-defined processes

b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any.

c. Precise and well-documented timelines along with the possibility of deemed approval.

d. Well-defined and time bound query system in place,

e. Seamless integration and approvals across various ministries/departments with the end-to-end online system.

f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of license/permission/registration Give your suggestions with justification for each license/permission/registration separately with detailed reasons along with examples of best practices if any.

Q3. What are the issues being faced in the existing processes of granting registration to IP-I providers? Identify and suggest measures to address the same.

Q4. What measures should be taken to promote small and medium telecom infrastructure providers with ownership of the network created by them for maintaining the quality of services?

Q5. Please provide your response with suggestions to improve the present system of operations and maintenance of the undersea cable network in respect of: a. What procedure should be followed to facilitate O&M agencies for smooth operations and maintenance of undersea cables/cable networks and restoration of faults within a definite timeline? b. What additional support is needed in terms of import and export of equipment, measurement tools and accessories etc., vessel conversion and various other clearances for expediting repair and operations of submarine cables by ship/vessel at cable landing station within Indian maritime zones?

Q6. Please suggest changes needed to simplify the following clearance/ permit procedures by various Government Authorities: a. In-transit permits b. Pre-repair permits c. Post-repair permits Provide your suggestions for each activity separately.

Q7. Please provide your response with proper justification to improve the present system of EMF radiation compliance in terms of: a. Relevance of EMF radiation audit and its impact for quick roll out of the network b. Measures to safeguard public interest and building confidence in public against propaganda of hazardous EMF radiations in field c. Issues being faced in the existing processes related to the self certification, audit and penalty scheme of EMF radiation compliance process on Tarang Sanchar portal.

Q8. What mechanism do you think should be followed in DoT to facilitate investors in exploring possibilities of business opportunities in the field of telecom? Provide your comments with justifications. Also, provide best international practices and adoption of new technologies for various processes and suggested process flow that could be adopted for further facilitating ease of doing business in India.

Q9. Whether the present system of licenses/clearances/certificates mentioned in para no. 3.94 or any other permissions granted by WPC, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of: a. Simple, online and well-defined processes b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any c. Precise and well-documented timelines along with the possibility of deemed approval d. Well-defined and time bound query system in place e. Seamless integration and approvals across various ministries/departments with the end-to-end online system f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of license/clearance/certificate Give your suggestions with justification for each license/ clearance/certificate separately with detailed reasons along with examples of best practices if any.

Q10. Whether the present system of permission/approval mentioned in para no. 3.101 or any other permissions granted by NOCC, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of: a. Simple, online

and well-defined processes b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any c. Precise and well-documented timelines along with the possibility of deemed approval d. Well-defined and time bound query system in place e. Seamless integration and approvals across various ministries/departments with the end-to-end online system f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of permission/approval Give your suggestions with justification for each permission/approval separately with detailed reasons along with examples of best practices if any.

Q11. Whether the present system of permissions/approvals mentioned in para no. 3.107 or any other permissions granted by TEC, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of: a. Simple, online and well-defined processes b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any c. Precise and well-documented timelines along with the possibility of deemed approval d. Well-defined and time bound query system in place e. Seamless integration and approvals across various ministries/ departments with the end-to-end online system f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of permission/approval Give your suggestions with justification for each permission/approval separately with detailed reasons along with examples of best practices if any.

Q12. What measures should be taken to ensure that there is no duplicity in standards or in testing at BIS, WPC, NCCS, and TEC? Which agency is more appropriate for carrying out various testing approvals? Provide your reply with justification.

Q13. Whether the present system of getting fresh and additional space segment capacity on Indian and foreign satellites for various services mentioned in para no. 4.15 or any other new service from DOS, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of a. Simple, online and well-defined processes b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any c. Precise and well-documented timelines along with the possibility of deemed approval d. Well-defined and time bound query system in place e. Seamless integration and approvals across various ministries/ departments with the end-to-end online system f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of space segment capacity Give your suggestions with justification for allocation of space segment capacity for each service separately with detailed reasons along with examples of best practices if any.

Q14. Whether the existing procedures to acquire a license for providing satellite-based services in the existing framework is convenient, fast, and end-to-end online for the applicants? If not, what other measures are required to simplify the various processes to enable ease of doing business in India for satellite-based services? Give details along with justification.

Q15. Whether the present system of permissions/registrations mentioned in para no. 5.10 or any other permissions granted by MeitY along with BIS, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of: a. Simple, online and well-defined processes 83 b. Simple application format with a need to review of archaic fields, information, and online submission of documents if any c. Precise and well-documented timelines along with the possibility of deemed approval d. Well-defined and time bound query system in place e. Seamless integration and approvals across various ministries/ departments with the end-to-end online system f. Procedure, timelines and online system of notice/appeal for rejection/cancellation of permission/registration Give your suggestions with justification for each permission/ registration separately with detailed reasons along with examples of best practices if any.

Q16. What are the issues being faced by various service providers in seeking stable and committed quality power supply connections from power DISCOMS? For statewide operations whether it is feasible to get power supply in time bound manner for various locations from a single-window contact or has to be made region-wise. What measures do you suggest to improve the same?

