



19 November 2024

**Shri Akhilesh Kumar Trivedi,
Advisor (Networks, Spectrum and Licensing)
Telecom Regulatory Authority of India
Tower F, NBCC World Trade Centre,
Nauroji Nagar, New Delhi-110029**

Subject: Tata Communications Limited comments to TRAI Consultation Paper on 'Terms and Conditions of Network Authorisations to be Granted Under the Telecommunications Act, 2023'

Dear Sir,

This is with reference to the TRAI Consultation Paper No. 16/2024 dated 22-10-2024 on '**Terms and Conditions of Network Authorisations to be Granted Under the Telecommunications Act, 2023.**

In this regard, please find enclosed herewith Tata Communication Limited's comments for your kind consideration as Annexure.

We request you to kindly consider our submissions while finalizing the recommendations and would be happy to provide any additional information, if required.

Thanking You,

Yours Sincerely,

**Alka Selot Asthana
Vice President and Head Regulatory
Tata Communications Limited**

Enclosed: As above

TATA COMMUNICATIONS

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Tata Communications Limited's response to TRAI Consultation Paper on the Terms and Conditions of Network Authorisations to be Granted Under the Telecommunications Act, 2023

Preamble

At the outset, we thank TRAI for providing us an opportunity to share our comments/inputs on this very important consultation paper on the terms and conditions of Network Authorisations to be Granted Under the Telecommunications Act, 2023. This paper has significant bearing as it seeks to introduce substantial changes in the existing licensing regime as it brings fresh perspective to become a network service provider for catering the connectivity requirements of TSPs. Therefore, it is requested TRAI to have a holistic approach while finalising these recommendations.

The paper is covering various network Authorisations namely – IP-1, CDNs, IXPs, Satellite Earth Station Gateway etc. and also sought views on new network Authorisations such as Ground stations as a service (GSaaS) and Cloud-hosted telecommunication networks. Also proposed new network authorizations such as IP-1, CDNs, IXPs etc. which are presently do not fall under any license except IP-1 registration and same were earlier also discussed in other consultation papers. We also believe that this paper also provides an opportunity of introducing CNPN non-captive network license to provide CNPN services to Enterprises.

It is our submission that present License regime has matured over this decade and any wholesale changes in the present license regime may be avoided in the interest of regulatory certainty. Therefore, we support the light touch network authorisation framework for providing network services to the TSPs.

We believe that any change in licensing framework should adhere to following core principles

- Any change in licensing/ authorisation framework should result in ease of doing business, bring certainty in business environment, rule based and time bound disposal and benefit to industry and strengthen ecosystem.
- Any change in licensing/ authorisation framework should also be fair and equitable with the perspective of the existing licensing framework/ existing licensees
- Same service, same rules: In case the scope of services being provided by various telecom licensees is same, they should be governed under the same rules.
- Any amendment in the licensing framework should preserve level playing field
- Change in licensing framework should not cause any revenue arbitrage opportunities thereby causing a loss to Government exchequer.

We request TRAI to ensure that there is adequate operational & regulatory certainty and predictability for the existing service providers as they migrate to the authorization regime to support innovation and investments in the sector. We are also of the view that the recommendation of TRAI should bring about pragmatic changes in the present licensing regime keeping ease of doing business initiative in focus with simplicity and transparency as key factors.

In view of above, our issue wise comments / inputs are as follows:

Q-1. Whether there is a need to merge the scopes of the extant Infrastructure Provider-I (IP-I) and Digital Connectivity Infrastructure Provider (DCIP) authorization (as recommended by TRAI in August 2023), into a single authorisation under Section 3(1)(b) of the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.

Q-2. In case your response to the Q-1 is in the affirmative, kindly provide a detailed response with justifications on –

- (a) Eligibility conditions for the grant of the merged authorisation; and**
- (b) Area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the merged authorisation.**

Tata Communications' Response to Q1 & Q2:

- Yes, the scopes of the extant Infrastructure Provider-I (IP-I) and Digital Connectivity Infrastructure Provider (DCIP) authorization should be merged.
- IP-I (Infrastructure Providers Category-I) registration is being done under Section 4 of the Indian Telegraph Act and thus at par with other telecom service licenses in statutory terms. However, no license fee /entry fee was imposed on the premise that IP-1 entities are serving only to the licensed TSPs and not providing any telecom services directly to end customers.
- The scope of IP-I is limited to providing passive assets such as Dark Fibre, Right of Way, Duct space, Tower & Poles on lease/ rent out/ sale basis to licensees of telecom services on mutually agreed terms and conditions. Therefore, Infrastructure service providers should be expanded in line with the concept of Neutral Host and support various licensed service providers with underlying infrastructure.
- In view of the above context, 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 Section 3 of the Telecommunications Act, 2023 to be named as DCIP authorization.
- The Scope, terms and conditions should be in accordance with TRAI recommendations on 'Introduction of Digital Connectivity Infrastructure Provider (DCIP) Authorization under Unified License (UL)' dated 08th August 2023.

Q-3. In case your response to the Q1 is in the negative, -

- (a) What changes (additions, deletions or modifications) are required to be incorporated in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the IP-I authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 as compared to the extant IP-I registration?**
- (b) Whether there is a need to make certain changes in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions**

(general, technical, operational, security etc.) of the DCIP authorisation (as recommended by TRAI in August 2023)?

If yes, kindly provide a detailed response with justifications.

Tata Communications' Response:

No comments in view of response provided in Q1 & Q2 above.

Q-4. (a) Which telecommunication equipment/ elements should be included in the ambit of 'in-building solution' (IBS)?

(b) Whether there is a need to introduce a new authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding in-building solution (IBS) by any property manager within the limits of a single building, compound or estate controlled, owned, or managed by it?

If yes, what should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of such an authorisation?

Please provide a detailed response with justifications.

Tata Communications' Response:

- No, this should be allowed as one of the services in the scope of merged DCIP and IP-I.
- We are of the view that there is no need to introduce any sperate authorisation for establishing, operating, maintaining or expanding in-building solution (IBS) by any property manager within the limits of a single building, compound or estate controlled, owned, or managed by it.
- The proposed merged IP-1 & DCIP Authorisation should be able to cater to this requirement for provisioning of passive and active infrastructure on mutually agreed terms with property owners.
- The Scope, terms and conditions should be in accordance with TRAI recommendations on 'Introduction of Digital Connectivity Infrastructure Provider (DCIP) Authorization under Unified License (UL)' dated 08th August 2023.

Q-5. Whether there is a need to make any changes in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the Content Delivery Network (CDN) authorisation, as recommended by TRAI on 18.11.2022? If yes, what changes should be made in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the CDN authorisation? Kindly provide a detailed response with justification.

Tata Communications' Response:

- No, we do not foresee any changes in the terms recommended by TRAI in its recommendations dated 18-11-2022.
- Moreover, Content Delivery Network service is in the application layer therefore it should be treated similar to other application layer services like OTT.
- TRAI vide its recommendations dated 18-11-2022, recommended the light touch framework in the form of registration with DoT through a simple online registration process. The draft registration guidelines mandates the CDN service provider to be an Indian Company, under the ambit of FDI rules and mentioned that Content Delivery Network (CDN) Provider registered company shall offer delivery of content to Service Providers and users in a non-discriminatory manner.
- However, considering the fact that CDN services are similar to OTT services, we recommend that there is no need for any licensing framework for the CDN services. Additionally, CDN Service Provider should parent for connectivity to a licensed service provider.
- In case, if TRAI still wish to recommend the licensing framework, we suggest that there should only be a simple registration framework for CDN should be recommended in line with TRAI recommendations dated 18.11.2022.

Q-6. Whether there is a need to make any changes in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the Internet Exchange Point (IXP) authorisation, as recommended by TRAI on 18.11.2022? If yes, what changes should be made in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the IXP authorisation? Kindly provide a detailed response with justification.

Tata Communications' Response:

- TRAI vide its recommendations dated 18-11-2022 had recommended a separate regulatory framework for any entity who is operating/intend to operate as IXP in India.
- In our view, there is no need for separate regulatory framework for operating IXPs in India and only valid Licensed Service Providers having UL-ISP / Standalone ISP Licenses establish and operate Internet Exchanges.
- Activities under IXP license are already covered by the ISP license and since ISP license does not have any significant entry barrier not much would be achieved by adding one more category in the list of authorizations.

- It is also evident from the fact that there are only 37 active IXPs operating in India¹ vis-à-vis ISPs. Therefore, introducing separate network authorisation for few IXPs may not be suggested as it may further increase complexity in licensing framework in addition to the enhanced compliance and cost burden.

Q.7 Whether there is a need to make any changes in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the Satellite Earth Station Gateway (SESG) authorisation, as recommended by TRAI on 29.11.2022? If yes, what changes should be made in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the SESG authorisation? Kindly provide a detailed response with justification.

Tata Communications' Response:

- Satellite services is evolving to be an alternate media for X-haul for terrestrial networks wherein separate licensing may not be needed for this media specifically. It should be available as an alternate media to all licensed service providers for providing licensed services and need X-haul connectivity.
- TRAI recommendations dated 29-11-2022 for SESG provides authorisation holder to establish, operate and maintain the Hub/Gateway and provide it as service to the service licensee. Spectrum will not be allocated to the spectrum and baseband equipment also will not be allowed to be installed for SESG authorization holder.
- The Baseband equipment & spectrum will be rather in scope of service licensee.
- Therefore, in our view, there is a no need to make any changes in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) related to SESG.

Q8. Whether there is a need to introduce a new authorisation for establishing, operating, maintaining or expanding satellite communication network, which may be used to provide network as a service to the entities authorised under Section 3(1)(a) of the Telecommunications Act, 2023? If yes-

(a) What should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of such authorisation?

(b) Whether an entity holding such authorisation should be made eligible for the assignment of spectrum for both feeder link as well as user link?

Kindly provide a detailed response with justification.

Tata Communications' Response:

¹ [IXP Tracker — Pulse](#)

- Tata Communications supports having a provision for a new authorization for Network as a service. Network authorisation for NGSO which will allow it authorisation holder to put the baseband system and hold the spectrum which can be used to provide services to multiple service licensee, though should not be allowed to provide services to end customers. Such network authorisation may be used to provide 'network as a service' (NaaS) for NGSO system.
- Following terms are suggested, related to this authorisation:
 - (i) Eligibility: Only Satellite Operator or its authorised local partner should be allowed to take such authorisation.
 - (ii) Term period: Considering large investment involved, the initial term of such authorisation should be 20 years extendible by 10 years period.
 - (iii) Area of operation: National and should also be allowed to serve countries outside India, subject to compliance of respective country local regulations) for ensuring ROI
 - (iv) Baseband equipment: NaaS authorisation holder should be allowed to put the baseband equipment though it should be mandatory that logical separated baseband and NMS (with full & exclusive control to configure, change, manage respective end customers on the network of respective service licensee) should be provided to respective service licensee.
- This network authorisation can be subsumed in the Long-Distance Service Authorisation considering satellite bandwidth as an alternate media for X-haul to cater connectivity requirements of the terrestrial networks.

Q-9. Whether there is a need to introduce an authorisation under Section 3(1) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding ground stations, which may be used to provide ground station as a service (GSaaS)?

If yes, what should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) for the authorisation to establish, operate, maintain, or expand ground stations, which may be used to provide GSaaS? Kindly provide a detailed response with justifications.

Tata Communications' Response:

- Tata Communications supports having a provision for a new authorisation for establishing, operating, maintaining or expanding Ground station as a service (GSaaS).
- Under this Authorization, the entity should be allowed to set up permanent ground stations, transportable earth stations, NGSO earth stations etc. The authorized entity should be allowed to set up any number of ground station antennas at a particular given location, particularly for NGSO. However, the authorized entity should not provision of services to the end users on the basis of this authorization. Ground Station gateway authorization should be treated as enabler for Service licensee who in turn would be provisioning and establishing end to end service/connectivity.
- To enable the growth of such services, it is important to have enabling provisions. Tata Communications recommends allotting the Ground station Authorization to an Indian entity which may have tie-up with the Satellite Operators.

- Few of the other suggested terms are as given below:
 - (i) Entry Fee: Nil / Negligible
 - (ii) Performance & Financial Bank Guarantee: Nil / Negligible
 - (iii) Eligibility Condition: Non-Government Entities, Companies registered under companies act 2013 in India.
 - (iv) Validity period: 20 years, extendible to 20 years.
- Though, it is a new and upcoming alternate media, satellite-based communications has high entry barrier of cost and availability, thus, GSaaS can also be allowed under DCIP.

Q-10. Whether there is a need to introduce an authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding cloud-hosted telecommunication networks, which may be used to provide telecommunication network as a service to the authorized entities under Section 3(1)(a) of the Telecommunications Act, 2023? If yes, what should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of such an authorisation? Kindly provide a detailed response with justifications.

Tata Communications' Response:

- No, Cloud based telecom services are essentially OTT services. Hence, these should be kept out of Telecom regulations. However, security and data privacy related regulations needs to be complied.
- Presently, the contemporary business landscape is defined by a confluence of technology trends. Cloud migration, cybersecurity concerns, the emergence of software-defined networks, exponential data expansion, the proliferation of connected devices, and the remote-work revolution are forcing Enterprises to rethink how they operate and how to do so securely to bolster security and harness the full potential of digital evolution.
- Cloud communications is being used predominantly by Enterprises in India and for Enterprises the security is the essence for their operations. When an enterprise move their communications from on premise to cloud, they are looking to address mainly following
 - Flexibility
 - Commercial viability and
 - Security.
- Similarly, with the technology advancements, licensed service providers are also having flexibility to offer licensed communications services irrespective of technology and/or platform (Cloud Computing, SDN, NFV etc.) being used in order achieve higher operational efficiency provided same should be able to demonstrate Lawful Interception capability. Moreover, major telecom service providers are already availing cloud hosted telecommunications network

services using their own private cloud such as virtualized instances of appliances like Billing server, KPI reporting, SBC, Soft switch etc.

- TRAI in its recommendations dated 18-09-2024 had recommended that the *authorised entities should be permitted to take telecommunication network resources on lease or hire from cloud service providers, which are either empaneled by the Ministry of Electronics and Information Technology (MeitY), Government of India as cloud service providers, or are authorised under Section 3(1) of the Telecommunications Act, 2023. The cloud is to be situated in India. The networks resources taken on lease or hire from cloud service providers shall be treated as part of the network of the Authorised Entity.*

In view of the above, it is submitted that Cloud hosted services provided to Authorised entities / enterprises should not be subjected to regulatory or licensing authorization. However, if such Cloud service provider (CSP) offering telecommunication network resources on lease or hire to authorised entities, such CSP should either be empaneled by the Ministry of Electronics and Information Technology (MeitY), Government of India as cloud service provider, having its cloud hosted along with the associated data/ information stored in India.

We also believe that introduction of such authorisation could lead to possibility of regulatory arbitrage and uneven playing field; therefore, the best possible way to leverage technological developments is to encourage infrastructure sharing without introducing any new authorisation.

Q-11. What should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the authorisation for Mobile Number Portability Service under Section 3(1)(b) of the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.

Tata Communications' Response:

No Comments.

Q-12. What provisions should be included in the terms and conditions of various network authorisations under Section 3(1)(b) of the Telecommunications Act, 2023 considering the various sections including Sections 4 to 9, 19 to 24, 32 to 42, 44, 45, 49, and 55 of the Telecommunications Act, 2023 and technological/ market developments in the telecommunication sector? Kindly provide a detailed response with justifications.

Tata Communications' Response:

- In order to have robust and forward-looking network authorizations under Section 3(1)(b) of the Telecommunications Act, 2023, key terms should address network security, adaptability to technological advancements, cyber threats, disaster management and market efficiency. However, we are of the view that any specific terms and conditions proposed to be included in authorisations under the provisions of the Telecom Act should be deliberated as a separate consultation before being proposed/ finalised.

Q-13. What provisions should be included in the terms and conditions of various network authorisations under Section 3(1)(b) of the Telecommunications Act, 2023 considering the

policy/ Act in the Space Sector and other relevant policies/ Acts in the related sectors?
Kindly provide a detailed response with justifications.

Tata Communications' Response:

No Comments.

Q-14. What should be the terms and conditions for the merger, demerger, acquisition, or other forms of restructuring of the entities holding network authorisations under Section 3(1)(b) of the Telecommunications Act, 2023? Please provide a detailed response with justifications in respect of each network authorisation.

Tata Communications' Response:

- As recommended earlier, the 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.
- Following are some of the suggestive terms:
 - The Network Authorization should have a provision to provide a simplified exit policy for Authorized Entities for closure of business through merger and de-merger.
 - It should be rule based and to be done in a time bound manner so to ensure that the companies do not lose out on the value of assets they have created due to delays in regulatory approvals.
 - In case an Authorized Entity does not hold any access spectrum, winding down of such telecom business should follow only NCLT process without any additional conditions or approvals from DoT.
 - Additionally, there should be an easy exit for the listed companies.

Q-15. What conditions should be made applicable for the migration of existing network licenses, registrations etc. to the new network authorisation regime under Section 3(1)(b) of the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.

Tata Communications' Response:

- At the outset, it is our submission that any changes from the terms and conditions in the existing license regime while devising new Authorization regime should be such that it should be better than existing terms in the old regime and new Regime should provide for an almost automatic path for migration to the new regime depending upon willingness of the licensee.
- There should be adequate operational certainty and predictability for the existing service providers as they migrate to the authorization regime to support the innovation and more investments in the sector.

- The migration of the existing Licensees to the new authorisation regime under the Telecommunications Act, 2023 should be either on expiry of the existing licenses or upon the willingness of the existing licensee to migrate to new authorization regime.
- There should not be any forced migration to the new authorization regime rather the terms and conditions of the new authorization regime should be made in such a manner that it incentivizes the migration to the new authorisation regime.

Q-16. What procedure should be followed for the migration of existing network licenses, registrations etc. to the new network authorisation regime under Section 3(1)(b) of the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.

Tata Communications' Response:

- The procedure for migration of the existing Network Licensees should be broadly on the same lines as contained in the guidelines for grant of Unified License where in the process for migration to UL was given.
- Following issues need to be kept in mind while migrating the existing Licensee to the new authorization regime:
 - On migration the new authorization shall be for a period of 20 years from the effective date of the new authorization irrespective of the validity period of the old license.
 - Credit of prorated entry fee (if any) paid while migrating to new authorization regime.
 - Existing operators should not be required to repay the application processing fee while migrating.

Q-17. Whether there is a need to introduce certain new authorisations (other than the authorisations discussed above) to establish, operate, maintain or expand telecommunication networks under Section 3(1)(b) of the Telecommunications Act, 2023? If yes, -

- (a) For which type of telecommunication networks, new authorisations should be introduced?**
- (b) What should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of such authorisations?**

Kindly provide a detailed response with justifications.

Tata Communications' Response:

- The deployment of private networks by Enterprise in India is at nascent stage and ecosystem for Captive Non-public Network (CNPN) use cases is dependent upon the availability of wireless spectrum for Enterprises in an affordable manner. Presently, despite having CNPN

license framework in place, there is no take-off of deployment of private networks because spectrum is not available.

- Therefore, there is a need to for introducing an new network authorisation for setting up of CNPN Services for Enterprises wherein, CNPN Network Service Provider would act as System integrator for Enterprises and should also be allowed to either acquire spectrum in its present licensing capacity from other Authorised entities or direct administrative spectrum may be assigned by the Government to deploy CNPNs for Enterprises on their behalf in line with the global practices.
- This will be a significant step for taking-off of CNPN services in India and for the success of Industry 4.0 initiative.
- CNPN as a concept needs rethink. Spectrum, license and CNPN network architecture designing should be the responsibility of licensed service provider and not Enterprises.

Q-18. Whether there is a need to remove certain existing authorisations to establish, operate, maintain or expand telecommunication networks, which may have become redundant with technological advancements? If yes, kindly provide a detailed response with justifications.

Tata Communications' Response:

No comments.

Q-19. Whether there is a need to club the scopes of certain authorisations to establish, operate, maintain or expand telecommunication networks into a single network authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 for bringing more efficiency in the telecommunication networks? If yes, kindly provide a detailed response with justifications.

Tata Communications' Response:

No Comments.

Q-20. What provisions should be included in the terms and conditions of various network authorisations under Section 3(1)(b) of the Telecommunications Act, 2023 to improve the ease of doing business? Kindly provide a detailed response with justifications.

Tata Communications' Response:

We are of the view that with a simplified authorisation process in place, the Regulatory framework will act as an enabler for emerging technologies and innovative services thereby promoting ease of doing business in the telecom sector.

In this context, we suggest as follows

- There should not be any license fee applicable on the network services provided under any of the network authorisation considering the fact that these services are being provided to other Authorised Entities / Enterprises and not to the end users.
- Authorisation format should be simple and cover the minimum requirements.
- The end-to-end process of obtaining the authorisation – new/ additional/ renewal/ surrender/ stop/ start in between the validity, should be through single online portal only with maximum automation and minimum human intervention
- Services under new Network Authorisation framework should be treated as add-ons with a single click of a web page as intimation with minimum processing fee.
- Grant of various Network service authorisations should be systematic, time-bound and single window clearance approach.
- The cost of compliance including minimum license fee, document submissions and monitoring requirements should not be the responsibility of Network Authorisation entities. Instead, Service Authorisation can be a single point for such responsibility.

Q-21. Whether there is a need for mandating a reference agreement between authorized entities establishing, operating, maintaining or expanding the telecommunication network, and authorized entities providing telecommunication services? If yes, -

- (a) Between which type of entities, reference agreements are required to be mandated?**
(b) What should be the salient features of the reference agreements between such entities?

Kindly provide a detailed response with justifications.

Tata Communications' Response:

- We are of the view that there is no need for mandating a reference agreement between authorised entities establishing, operating, maintaining or expanding the telecommunication network and authorised entities providing telecommunication services.
- It should be left to market forces and in case of market failure TRAI may consider the same for consultation in future.

Q-22. Are there any other inputs or suggestions relevant to the subject? Kindly provide a detailed response with justifications.

Tata Communications' Response:

No Comments.

Q-23. In case it is decided for merging the scopes of the extant Infrastructure Provider-I (IP-I) and the Digital Connectivity Infrastructure Provider (DCIP) authorization into a single authorization under the Section 3(1)(b) of the Telecommunications Act, 2023, what should be the: -

- (a) Minimum equity and Networth of the Authorized entity.**
(b) Amount of application processing fees
(c) Amount of entry fees
(d) Any other Fees/Charge Please support your response with proper justification.

Tata Communications' Response:

The minimum equity and Networth, amount of application processing fees, Entry fee, PBG, FBG etc. for the single (IP-I) and the Digital Connectivity Infrastructure Provider (DCIP) authorization should be in accordance with TRAI recommendations on 'Introduction of Digital Connectivity Infrastructure Provider (DCIP) Authorization under Unified License (UL)' dated 08th August 2023.

Q-24. In case it is decided not to merge the scopes of IP-I and DCIP, what changes/modifications are required to be made in the financial conditions of –

(a) DCIP authorisation as recommended by TRAI in August 2023

(b) IP-I authorisation under the Telecommunications Act, 2023 with respect to the extant IP-I registration?

Please provide a detailed response with justification.

Tata Communications' Response:

No Comments in view of our response to Q23.

Q-25. In case it is decided to introduce a new authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding in-building solution (IBS) by any property manager within the limits of a single building, compound or estate controlled, owned, or managed by it, then-

(a) Whether there is a need to have financial conditions associated with such an authorisation?

(b) In case your response to the above is in the affirmative, then what should be financial conditions for such an authorisation?

Please provide detailed response with justification.

Tata Communications' Response:

- As per our response to Q4 above, we are of the view that there is no need to introduce any sperate authorisation for establishing, operating, maintaining or expanding in-building solution (IBS) by any property manager. The proposed merged IP-1 & DCIP Authorisation should be able to cater to this requirement for provisioning of passive and active infrastructure on mutually agreed terms with property owners.
- The financial conditions for single (IP-I) and the Digital Connectivity Infrastructure Provider (DCIP) authorization should be in accordance with TRAI recommendations on 'Introduction of Digital Connectivity Infrastructure Provider (DCIP) Authorization under Unified License (UL)' dated 08th August 2023.

Q-26. Whether there is a need to change/ modify any of the financial conditions of the IXP and CDN authorisations from those recommended by TRAI on 18.11.2022?

If yes, please provide a detailed response with justification(s).

Tata Communications' Response:

Please refer our detailed response provided in Q5 & Q6.

Q-27. Whether there is a need to change/ modify any of the financial conditions of the Satellite Earth Station Gateway (SESG) authorization from those recommended by TRAI on 29.11.2022?

If yes, please provide a detailed response with justification(s).

Tata Communications' Response:

No Comments.

Q-28. In case it is decided to introduce a new authorisation for establishing, operating, maintaining or expanding satellite communication network under Section 3(1)(b) of the Telecommunications Act, 2023, then, what should be the financial conditions for such authorisation?

Tata Communications' Response:

No Comments.

Q-29. In case it is decided to introduce an authorisation under Section 3(1) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding ground stations, which may be used to provide Ground Station as a Service (GSaaS), then:
(a) Whether there is a need to have financial conditions associated with such an authorisation?

(b) In case your response to the above is in the affirmative, then what should be financial conditions for such an authorisation?

Please provide detailed response with justification.

Tata Communications' Response:

No comments.

Q-30. In case it is decided to introduce an authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding cloud-hosted telecommunication networks, which may be used to provide telecommunication network as a service to the authorised entities under Section 3(1)(a) of the Telecommunications Act, 2023, then:

(a) Whether there is a need to have financial conditions associated with such an authorisation?

(b) In case your response to the above is in the affirmative, then what should be financial conditions for such an authorisation? Please provide detailed response with justification.

Tata Communications' Response:

In reference to our response to Q10 above, we reiterate that the Cloud hosted services provided to Authorised entities / enterprises should not be subjected to regulatory or licensing authorization.

Q-31. For Mobile Number Portability Service authorisation under Section 3(1)(b) of the Telecommunications Act, 2023, should the amount of entry fee and provisions of bank guarantees be:

- (a) kept same as per existing MNP license.
- (b) kept the same as recommended by the Authority vide its Recommendations dated 19.09.2023
- (c) or some other amount/ provisions may be made for the purpose of Entry Fee and Bank Guarantees. Please support your response with proper justification.

Tata Communications' Response:

No Comments.

Q-32. For Mobile Number Portability Service authorisation under Section 3(1)(b) of the Telecommunications Act, 2023, whether there is a need to review/ modify:

- (a) Definition of GR, AGR, ApGR
- (b) Rate of authorisation fee
- (c) Format of Statement of Revenue Share and License Fee
- (d) Norms for the preparation of annual financial statements
- (e) Requirement of Affidavit Please provide your response with detailed justification.

Tata Communications' Response:

No comments.

Q-33. What financial conditions should be made applicable for the migration of the existing licensees/ registration holders to the relevant new authorisations under section 3(1) (b) of the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.

Tata Communications' Response:

We wish to submit that there should not be any migration fee / charge should be levied on the existing licensees / registration holders at the time of migration.

Q-34. In case it is proposed for introducing certain new authorisations to establish, operate, maintain or expand telecommunication networks under Section 3(1)(b) of the Telecommunications Act, 2023, what should be the respective financial conditions for each of such authorisation(s)? Please provide a detailed response with justifications in respect of each network authorisation, separately.

Tata Communications' Response:

In response to Q17 above, we have recommended for introducing a new network authorisation for setting up of CNPN Services for Enterprises. In line with TRAI recommendations on DCIP on imposition of license fee, it is suggested that there should not be any license fee applicable on the CNPN services provided under the proposed CNPN network authorisation considering the fact that these services are being provided to the Enterprises for their captive purposes and not to the end users.

Q-35. What should be the financial conditions for the merger, demerger, acquisition, or other forms of restructuring of the entities holding network authorisations under Section 3(1)(b) of the Telecommunications Act, 2023? Please provide a detailed response with justifications in respect of each network authorisation.

Tata Communications' Response:

No Comment.

Q-36. In case it is decided to club the scopes of certain authorisations to establish, operate, maintain or expand telecommunication networks into a single network authorisation under Section 3(1)(b) of the Telecommunications Act, 2023, then, what should be the financial conditions for such authorisations? Please provide a detailed response with justifications for each network authorisation, separately.

Tata Communications' Response:

No Comments.

Q-37. Whether there are any other issues/ suggestions relevant to the fees and charges? The same may be submitted with proper explanation and justification.

Tata Communications' Response:

TRAI in its recommendations on 'Framework for Service Authorisations to be granted under Telecommunications Act, 2023', has recommended Enterprise Communication Service Authorisation in the category of Auxiliary Service authorisations. The scope of this authorisation would include Audio Conferencing/ Audiotex/Voice Mail service authorisation in addition to Cloud based EPABX service also, as all these services are being provided, generally, to the enterprise customers.

In this regard, we request TRAI to kindly review the need for allocation of numbering resources (which could be 10 digit or any other format – to be recommended) to Enterprise Service Providers directly from DoT at Pan India basis for various communication-based services including cloud-based services, rather than only going through Access Service providers for the same. The separate earmarking and allocation of numbering resources for Enterprises will help in end-to-end stamping for traceability purposes and can be an alternative to bulk number resources and also reduce their dependency on Access Service Providers.