AMCHAM's SUGGESTIONS

1. **Manufacturing of Telecom Products**

   - Exemption/No increase in import duty for raw material (preform) used in manufacturing optical fiber. Applicable for made in India products.

   - Import duty clause for raw material (preform) used in manufacturing optical fiber to be reviewed every 10 years.

   - Fiber import duty to be continued for supporting make in India initiative.

   - Telecom products like optical fiber and cable which offer better specifications than the recommended specs in standards should be given due weightage and graded accordingly.

2. **Certification/Approval Process Telecom Products**

   - TEC/CACT optical fiber and cable approval process to be simplified. Simplified procedure will significantly improve supply chain efficiencies and on time infrastructure deployment.

   - Validity of product certification to be extended from 3 to 5 year period for optical fiber and cable since these are established products in the market

3. **Telecom Products Planning**

   - Envisage a clear roadmap of active and passive telecom product requirements for rolling 5 year planning period; to enable the telecom industry effectively plan demand supply situation. The 5 year forecast of products will enable speedy completion of critical telecom projects.

4. **Broadband**

   - To increase and speed up FTTH deployment in cities and towns by enabling guidelines and policies.

5. **Standardization of telecom products**

   - Standard OFC designs to be recommend in consultation with TRAI, across State owned Operators/ carriers including BBNL, BSNL, MTNL, ONGC, Power Grid Corp, GAIL, Indian Railways, Indian Defense (for non-Tactical applications) as well as Private Carriers for the following:

     o For long distance applications – 96F / 48F single jacketed armored cables- LT design, standard length, standard dimensions with recommended raw material sources,

mandatory for State owned operators. Cables to be installed in HDPE ducts with maximum 30% fill-factor on day-1

- For access network applications – 48F/ 24F cables- armored/ unarmored LT type standard length, standard dimensions with recommended raw material sources, mandatory for State owned operators

- Joint closure design to be standardized

6. OFC Network Installation

OFC network installation guidelines to be published and following points to be made mandatory to ensure strong OFC backbone network.

- GIS mapping to be used while installing OFC, so that it will ensure traceability of cable. Data to be mapped during maintenance of OFC networks as well.

- OFC to be installed separate from power, water, cooking gas and sewer pipelines

- Power lines must be at least 1000mm away from Telecom duct cluster

- Underground deployment first preference. Aerial in case of terrain constraints

- Splice manhole design to be standardized across country

- DoT must ensure severe penalties on agencies/ individuals disrupting/ sabotaging telecom cable routes, as they must be considered essential services along with electricity, water supply.

7. Infrastructure

- Development of utility corridors while constructing new roads. OFC ducts to be laid along with new road construction to reduce multi digging. Since the duct for OFC is present at the time of cable installation, the additional fiber can be deployed easily

- The Government could consider moving away from L1 bid criteria (lowest cost) for awarding contracts for critical applications like Datacenters and etc., and give weightage to emerging and futuristic technologies.

- Set the regulation for use of Fire retardant products for use in in-building installations like Datacenters etc. For example it should consider using only LSZH products (Low smoke zero halogen products). It is a well-established fact that more people die due to smoke than the actual fire itself.

8. **Address the issue of double taxation on AGR and License Fee**

    Industry has to firstly pay license fees and thereafter provide a share in revenue to the Government (AGR). This is a double whammy since AGR is computed after including charges paid to Government. This leads to a cascade impact imposing burden on the consumer. The industry requires AGR to be computed only on value addition by the capacity provider since licensing fees has already paid on the raw price. This needs to be addressed to improve business viability and consumer affordability.

9. **Revenue neutrality**

    Flat rate results in uncapped amounts being paid. Once the desired revenue target is achieved by the Government, no further burden may be cast on licensee so that reduced costs can be offered to consumers. This can be achieved by a variable rate instead of a flat rate.

10. **Corresponding obligations of Government**

    The telecom sector has been the bed rock of innovation and growth in India. This has been possible by the initiative taken by the industry despite not having clear guidelines on the Government obligations, such as time commitment for spectrum allocation, licenses etc.

11. **Ease of doing business**

    There still are several hurdles to take the industry to the next level. Telecom requires to be given infrastructure status and single window clearances for all telecom projects.

12. **IPR & security of networks**

    IPR is an important aspect for data sharing and there should be absolute protection of IPR for data sharing.

13. **Regulatory policy as key enabler to Digital transformation through License Reforms**

    The new NTP to promote and create an enabling regulatory framework for growth of digital services SDN/NFV and remove any barriers to seamless flow of data across boundaries while balancing the privacy & security needs.

    The existing telecom licensing reforms process completes 25 years and have resulted in phenomenal growth of voice based services. However, the next phase of growth as also recognized by numerous Government and Industry policies is of Data, fueled by emerging technologies and service formats. The next couple of years will see transition of traditional brick and mortar networks to software based sophisticated and cloud based platforms (Software Defined Networks (SDN, Network Virtualization Function (NVFs), IoT/M2M etc.).

    While the existing licensing regime has made numerous attempts (through license amendments) to keep pace with the emerging technologies, however this has not been fully successful in aligning with international best practices as far as growth of data services is concerned.

It is quite evident that the policies and regulations that have helped achieve phenomenal success in the voice segment may not be fully helpful for the growth and targets which has been envisaged for data and broadband services. The need of the hour is to ensure a full review of the current license regime and arrive at a framework which is based on the needs of the sector, based on light touch regulation, embraces technology and innovation which is the key in the data services. The misses in the existing licensing regime to corroborate the new technological developments and new services/ platforms etc. needs to be number 1 priority under the new policy.

The current effort on formulating National Telecom Policy (NTP-2018) will surely change the licensing regime which is forward looking as well as corroborating with the new technological developments, new services/ platforms and embraces global best practices. The premise of proliferation of data services is seamless interconnection and convergence of services, networks and devices. This was also recognized under the NTP 2012. However, the restrictions continue to impact the growth. There is an urgent need to remove such interconnection barriers as future is on data side, a shift from voice centric licensing to data centric.

14. **Machine-2-Machine (M2M)**

The M2M guidelines being prepared as part of NTP 2012, should not impose any restrictions on cross border data flows, embrace light touch regulations, impose no data localization requirements, facilitate permanent international roaming in line with global best practices, and seeks removal of proposed registration/licensing requirements.

15. **Over The Top (OTT)**

Focus of the New NTP is to give a healthy push to application/platform services, so we should emphasize concept of regulatory neutrality or deregulation so that OTT & Telecom Operators can compete on a level playing field basis.

16. **Security & Privacy**

Review sector specific Data Privacy restrictions, where required remove additional compliance/reporting obligations as our business is increasingly reliant on data centric business model , existing horizontal data privacy requirements are sufficient to deal with the Data Privacy concerns.