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Re: Consultation Paper on Regulatory Framework for Promoting Data Economy through Establishment of Data Centres, Content Delivery Networks, and Interconnect Exchanges in India (CP 16122021)

Respected Sir:

Juniper Networks is pleased to provide this input in response to the Telecom Regulatory Authority of India's (TRAI) Consultation Paper on Regulatory Framework for Promoting Data Economy through Establishment of Data Centres, Content Delivery Networks, and Interconnect Exchanges in India. We appreciate that TRAI is seeking stakeholder comments on whether the government should mandate trusted source procurement for data centres. We appreciate the government's need to ensure a secure communications infrastructure comprised of trusted solutions and respectfully recommend that TRAI not extend the existing National Security Directive on Telecommunication Sector to data centres.

Juniper Networks is a global and trusted developer of networking infrastructure solutions spanning routing, switching, security, network access, and network management hardware and software. We are particularly proud of our presence in India, which features our India Excellence Centre (IEC). The IEC hosts over 3,000 employees in Bengaluru providing services to in-country service providers and enterprises, including all Tier 1 service providers, the Indian Railways ticketing system, and the National Knowledge Network.

It is clear from the Consultation Paper that TRAI is taking a very careful and thoughtful approach to the nation's communications infrastructure. Our comments are limited to one question that TRAI raises.

**Q.13: Whether trusted source procurement should be mandated for Data Centre equipment? Whether Data Centres should be mandated to have security certifications based on third-party Audits? Which body should be entrusted with the task? Should security certifications be linked to incentives? If so, please give details with justifications.**

Based on our experience with the current National Security Directive on Telecommunication Sector (NSDTS), we recommend that TRAI not extend the trusted source program in its current form to data centre equipment. As industry groups have indicated to government ministries and departments over the past several months since that program took effect, confusion remains around how the program works and how products are evaluated. This confusion makes it difficult to get products approved and means telecom providers in India cannot build networks in a timely fashion.

In addition, please keep in mind that the Indian government recognizes the Common Criteria Certification Scheme (CC). As you may be aware, the CC is an international standard for computer security that allows product users and developers to identify relevant security requirements and evaluate solutions accordingly. Many major IT providers, including Juniper Networks, already subject their solutions to the Common Criteria and have certified products that we offer to telecom providers and data centre operators in India.

Thank you again for issuing the Consultation Paper and for considering our views. If you have any questions about this submission, please feel free to reach me at [spgarg@juniper.net](mailto:spgarg@juniper.net) or 1-571-203-1908.

Sincerely,



**Sampak P. Garg**  
**Senior Director**  
**Government Relations**