



EBG FEDERATION

Dated 3rd October 2017

Shri S.T. Abbas,
Advisor (Networks, Spectrum and Licensing),
Telecom Regulatory Authority of India
New Delhi

Dear Sir,

We would like to bring to your attention the issue of Remote Access (RA) which is critical for monitoring and network operational activities. The current process of preapproval of RA sites is very time consuming, hampering TSP network/business expansion activities.

TSP applications for new RA sites are pending with DoT from last many years and no permission is being granted. In fact, the compliance of operators are checked against the requirements which are not even part of the RA guidelines and the matter continues to be dealt between TERM cell and DoT.

We recommend that current process of obtaining prior approval of locations be changed to a process of prior-intimation or post-intimation.

Secondly, the draft recommendations are most appreciated for improving the SACFA Clearance process and all licenses and approvals of WPC, by introducing end-to-end online process with prescribed timelines as well as recommending 15 day and 30 day approvals for demo and Experimental licenses respectively from WPC. We request the Regulator to consider the points we had submitted in our earlier submission as these issues also speed up the processes of delivery and overall performance of the industry.

- facilitating 24x7 customs clearances. This is a major time delay and roadblock for maintaining schedules while implementing network rollout.
- Secondly, equipment that needs to be maintained in the networks face an issue as far as Repair and Return process is concerned. Global R&R policy of equipment necessitates equivalent hardware replacement where repair is not possible, which is not allowed re-entry into India.
- Thirdly, Capital goods for R&D purposes with no further sale or commercial transaction motive should be free to import without need to re-export the same in 3 years. R&D equipment has longer life cycle and there should be no need to re-export the same. This would encourage global companies to move existing investments on R&D operations to Indian locations bringing much needed technological development within our shores. MoEF and MeitY need to be engaged by DoT for improving this situation.

We thank the Regulator for this opportunity to submit our thoughts on the draft recommendations and hope that our contribution will help in formulating the policy.

Best Regards,

TV Ramachandran,
Chairman, EBG Federation
(Telecom Sector Committee)

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