

From: nurbaks78@gmail.com
To: "Akhilesh Kumar Trivedi" <advmn@traf.gov.in>
Sent: Monday, September 25, 2023 11:00:07 AM
Subject: Counter Comments-TRAI CP dated 07072023

Dear Sir,
The attachment is as per subject matter.
2.Submitted for kind consideration.
3.Withbest wishes & regards,
R B Sahajpal

1. Introduction:

1.1 This is an **ex post-facto** CP⁶ as **Broadband Internet** is a reality and ‘Broadband technology allows for high-speed transmission of voice, video and data over networks and ICT applications.’⁷

1.1 It may worthwhile to have a glimpse on the journey traversed before the appearance of the present **AVATAR** of the extant CP⁸:

2. Previous Consultation/Recommendations/Regulations/Directions/Other Papers are:

2.1 Consultations:

2.1.1 27/03/2015 **Regulatory Framework for Over-the-top (OTT) services** Quality of Service Division⁹ (**inconclusive**)¹⁰

2.1.2 12/11/2018 **Regulatory Framework for Over-The-Top (OTT) Communication Services** Quality of Service Division¹¹

2.1.3. 07/07/2023 **Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services** Network, Spectrum and Licensing¹²

3. Recommendation:

3.1. 14/09/2019 **the Authority sent its Recommendations on ‘Regulatory Framework for Over-The-Top (OTT) Communication Services’----- to DoT.**¹³

4.Regulations:

4.1. Nil.

5.Directions:

5.1. Nil.

6. Others:

6.1. DoT issued ‘**Net Neutrality DoT Committee Report**’⁸ in May 2015. **The said report examined, inter-alia, the OTT services, and their impact on the telecom sector.**¹⁴

6.2. ‘Thereafter, in the year 2016, DoT, through a reference letter dated 03.03.2016, requested TRAI to provide its recommendations on net neutrality including traffic management and economic, security & privacy aspects of OTT services, etc. Considering the complexity of the issues, referred to in the DoT’s reference letter dated 03.03.2016, and other interrelated issues, the Authority chose to deal with specific issues through distinct consultation processes’¹⁵.

The Authority released the following recommendations and regulations pertaining to the issues referred to in the DoT’s reference letter dated 03.03.2016:

Date	Recommendations and Regulations
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08.02.2016	TRAI issued ‘The Prohibition of Discriminatory Tariffs for Data Services Regulations, 2016’. ¹⁶
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24.10.2017	TRAI sent the Recommendations on ‘Regulatory Framework for Internet Telephony’ to DoT. ¹⁷
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28.11.2017	TRAI sent the recommendations on ‘Net Neutrality’ to DoT. ¹⁸
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16.07.2018	TRAI sent the recommendations on ‘Privacy, Security and Ownership of Data in the Telecom Sector’ to DoT.’ ¹⁹
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6.2 1.12.2021 SEVENTEENTH LOK SABHA

MINISTRY OF COMMUNICATIONS (DEPARTMENT OF TELECOMMUNICATIONS)

Counter Comments
TRAI CP¹PR^{2,3,4,5}

SUSPENSION OF TELECOM SERVICES/INTERNET AND ITS IMPACT

Presented to Lok Sabha on 01.12.2021

Laid in Rajya Sabha on 01.12.2021²⁰

3. “the present consultation is focused on the following:

- (a) Identification of a suitable regulatory mechanism for OTT communication services, and
- (b) Examination of the issues related to selective banning of OTT communication services.²¹

4. The phrase ‘level playing field’ in the extant CP is mentioned as ‘competitive neutrality’ quoting²².

5. The phrase ‘OTT Communication services’ is appearing ‘34’ times in the extant CP and distribution is as follows:

- (a) ‘12’ times in ‘Issues for Consultation’ Questions:
- (b) ‘7’ times in distributed question in the narrative of CP.
- (c) ‘15’ times in the narrative of CP.

ISSUES FOR CONSULTATION

Stakeholders are requested to provide responses to the following questions with detailed justifications:

A. Issues Related to Regulatory Mechanism for OTT Communication Services

Q1: What should be the definition of over-the-top (OTT) services? Kindly provide a detailed response with justification.

Q2: What could be the reasonable classification of OTT services based on an intelligible differentia? Please provide a list of the categories of OTT services based on such classification. Kindly provide a detailed response with justification.

Q3: What should be the definition of OTT communication services? Please provide a list of features which may comprehensively characterize OTT communication services. Kindly provide a detailed response with justification.

Q4: What could be the reasonable classification of OTT communication services based on an intelligible differentia? Please provide a list of the categories of OTT communication services based on such classification. Kindly provide a detailed response with justification.

Q5. Please provide your views on the following aspects of OTT communication services vis-à-vis licensed telecommunication services in India:

- (a) regulatory aspects;
- (b) economic aspects;
- (c) security aspects;
- (d) privacy aspects;
- (e) safety aspects;
- (f) quality of service aspects;
- (g) consumer grievance redressal aspects; and
- (h) any other aspects (please specify). Kindly provide a detailed response with justification.

Q6. Whether there is a need to bring OTT communication services under any licensing/regulatory framework to promote a competitive landscape for the benefit of consumers and service innovation? Kindly provide a detailed response with justification.

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Q7. In case it is decided to bring OTT communication services under a licensing/ regulatory framework, what licensing/ regulatory framework(s) would be appropriate for the various classes of OTT communication services as envisaged in the question number 4 above? Specifically, what should be the provisions in the licensing/ regulatory framework(s) for OTT Communication services in respect of the following aspects:

- (a) lawful interception;
- (b) privacy and security;
- (c) emergency services;
- (d) unsolicited commercial communication;
- (e) customer verification;
- (f) quality of service;
- (g) consumer grievance redressal;
- (h) eligibility conditions;
- (i) financial conditions (such as application processing fee, entry fee, license fee, bank guarantees etc.); and
- (j) any other aspects (please specify). 86 Kindly provide a detailed response in respect of each class of OTT communication services with justification.

Q8. Whether there is a need for a collaborative framework between OTT communication service providers and the licensed telecommunication service providers? If yes, what should be the provisions of such a collaborative framework? Kindly provide a detailed response with justification.

Q9. What could be the potential challenges arising out of the collaborative framework between OTT communication service providers and the licensed telecommunication service providers? How will it impact the aspects of net neutrality, consumer access and consumer choice etc.? What measures can be taken to address such challenges? Kindly provide a detailed response with justification.

B. Issues Related to Selective Banning of OTT Services

Q10. What are the technical challenges in selective banning of specific OTT services and websites in specific regions of the country for a specific period? Please elaborate your response and suggest technical solutions to mitigate the challenges.

Q11. Whether there is a need to put in place a regulatory framework for selective banning of OTT services under the Temporary Suspension of Telecom Services (Public Emergency or Public Safety) Rules, 2017 or any other law, in force? Please provide a detailed response with justification. 87

Q12. In case it is decided to put in place a regulatory framework for selective banning of OTT services in the country, -

(a) Which class(es) of OTT services should be covered under selective banning of OTT services? Please provide a detailed response with justification and illustrations.

(b) What should be the provisions and mechanism for such a regulatory framework? Kindly provide a detailed response with justification.

Q13. Whether there is a need to selectively ban specific websites apart from OTT services to meet the purposes? If yes, which class(es) of websites should be included for this purpose? Kindly provide a detailed response with justification.

Ans.13. No specific answer to **Q1.** to **Q13.** However please consider **Ans.14.** below.

Q14. Are there any other relevant issues or suggestions related to regulatory mechanism for OTT communication services, and selective banning of OTT services? Please provide a detailed explanation and justification for any such concerns or suggestions.

Ans.14.

4. Conclusions:

1. The extant Consultation Paper is on 'Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services'.

1.1 The phrase "**OTT Communication Services**" occurs '34' times in the CP.

1.2 There are '14' Questions in the extant CP soliciting response from the 'stake holders'.

(a) Questions '1' to '9' are regarding scope & attributes of the 'OTT Communication Services'

(i) **Q3.** is about the 'definition of OTT Communication Services'

(x) The response of one academic stake holder is:

'While I do not propose a definition for OTT communications services, I want to stress how difficult it is to assign internet applications, content, and services to particular categories.'²³

(ii) **Q5.** Is about 'aspects of OTT communication services vis-à-vis licensed telecommunication services in India: quality of service.'

(x) The response of one academic stake holder is:

'there is no need to subject OTT communications services to quality of service requirements. For the last 30 years, OTT services have flourished using best-effort connections over consumer-facing broadband networks.'²⁴

2. Kindly refer paras **1.,3.,3.1** above:

2.1. "3.1 The Authority recommends that:

(i.) Market forces may be allowed to respond to the situation without prescribing any regulatory intervention. However, developments shall be monitored and intervention as felt necessary shall be done at appropriate time.

(ii.) No regulatory interventions are required in respect of issues related with Privacy and security of OTT services at the moment.

(iii.) It is not an opportune moment to recommend a comprehensive regulatory framework for various aspects of services referred to as OTT services, beyond the extant laws and regulations prescribed presently. The matter may be looked into afresh when more clarity emerges international jurisdictions particularly the study undertaken by ITU."²⁵ is not available in the extant CP²⁶.

(a) However ITU issued

(i) '**Economic Impact of OTTs Technical Report 2017'**²⁷ containing material relevant to the extant CP.

(ii) Collaborative framework for OTTs Recommendation ITU-T D.262²⁸

3. Kindly refer to paras **1.,6.,6.1.** above:

3.1.

TRAI took action taking the issue as complex.

4. Kindly refer to paras **1.,6.,6.2.** above:

4.1. '2.A kind reference is also invited to the recommendation no. 14 of the 26 th report of the Parliament's Standing Committee on Communication and Information Technology²⁹ on the subject 'Suspension of Telecom Services/ Internet and its impact **gist** of which is as under

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“The Committee strongly recommended that the Department urgently examine the recommendation of TRAI and come out with a policy which will enable the selective banning of OTT services with suitable

technological intervention, such as Facebook, WhatsApp, Telegram services during period of unrest/ crisis that are liable to be used by the terrorists or anti-national element/ forces of ferment trouble in the specified regions. The Committee look forward to positive development in this regard. With respect to the above mentioned recommendation of the Parliament’s Standing Committee,

(a) DoT replied that it will explore the possibility of regulation of OTT services and banning the services on selective basis in consultation with TRAI, MEITY and MHA.”³⁰

(i) However ‘gist’ above is at a variance with the contents of the Report as the reference to significant entry ‘XVIII. Selective Banning of Services and continuation of services over Government Telecom Network’³¹ is missing.

5. Kindly refer paras **1.4** above:

5.1. Stake holders have used the phrase ‘level playing field’ clarifying the concept/ sans clarifying.

(a) ‘same service same rules’ as per ³².

(b) ‘similar licensing and regulatory framework would help ensure a level playing field.’ as per ³³.

(c) ‘This principle of ‘Same Service – Same Rules’ is a must to ensure a level playing field and fair competition in the sector.’ as per ³⁴.

(d) ‘same service same rules’ for OTT communication services and Telcos, to ensure a level playing field.’ as per ³⁵.

(e) ‘same service same rules’ for OTT communication services and Telcos, to ensure a level playing field.’ as per ³⁶.

6. Kindly refer para **1.5** above:

6.1. The distribution of the phrase ‘**OTT Communication Services**’ clearly indicates that there no clarity within TRAI itself about the definition of the said phrase.

6.2. Stake holders have used the phrase ‘OTT Communication Services’ clarifying the concept/ sans clarifying:

(a) ‘1. Definition: DoT’s definition as provided in Net Neutrality Committee Report, May 2015, appears to the most closely placed. We recommend that the same definition should be used for OTT-CS, with a minor modification -----”:³⁷

(b) ‘OTT communication services are services that provide real time person-to-person telecommunication services over the internet, bypassing the regulatory mechanism of traditional network operators, but using their internet infrastructure. Some popular examples of these include messaging platforms like WhatsApp, Telegram, Duo, Google Meet, Signal etc. using internet protocol to transfer data packets independently using different layer and these features that may comprehensively characterise OTT communication services.’³⁸

(c) ‘In fact, this consultation too, begins with the assumption that “OTT communication services” form a category of Internet-based services, before stakeholders have had a chance to respond to the consultation paper. There is already a pre-existing, clear, and indeed intelligible differentia between the telecom and Internet ecosystems—justified by their separate regulation by different ministries.

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This not only makes it an unnecessary exercise for TRAI to undertake, but indeed risks regulatory disharmony. Such a bifurcation must continue, as any attempt to regulate or govern Internetbased services as a telecom service would be a colorable exercise of power, i.e. under the doctrine of colorable legislation in the country, TRAI transgressing its powers and indirectly attempting to do something that it could not have done directly.³⁹

5. Summarising:

(a) The ‘Topic’ of relevant CP’s has been varying over time:

(i) Please refer to **references 7.,8.,9.,10.,11.** below.

(b) Even the ‘Topic’ of the extant CP is subject to **inter-alia** the very definition of ‘**OTT Communication Services**’ which is yet to be firmed up.

(i) Please refer to **Conclusions** paras **4.,4.1** and its subparagraphs above.

(c) The TRAI earlier has stated that ““3.1 The Authority recommends that i. Market forces may be allowed to respond to the situation without prescribing any regulatory intervention. However, developments shall be monitored and intervention as felt necessary shall be done at appropriate time.”⁴⁰

(i) Please refer to **Conclusions** paras **4.,4.,4.1** above.

6.Suggestions:

1.The following suggestions are submitted for kind consideration:

(i) Considering paras **5.,a,(i),b.,(i),c.,(i).** above, it may not be advisable to resort to **a priori, ex ante** Regulatory Frame work for **OTT Communications** for an **ex post-facto** situation.⁴¹

(ii) Instead TRAI may try for **a Regulatory Framework** for **OTT Communications** adopting **Empirical Approach** considering the following inputs:

(i) **Regulatory impact analysis or regulatory impact assessment (RIA) report**⁴² based on Monitoring data collected as per paras **5.,(c)** above

(ii) Comments received from as many as ‘207’ stake holders.(Reference **43. 1** to **207** below.)

2.Extant CP may be held in abeyance please.

3. TRAI may also consider any other input/inputs for the purpose as deemed fit.

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30. para 1.8 supra reference **'1'**.
31. page '27' supra reference **'20'**.
32. page '2' below reference **43.206**.
33. Page 33 of 46 below reference **43.207**.
34. Page 3/7 of below reference **43.205**.
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36. Page 4/8 of below reference **43.180.**
37. Page 3/7 of below reference **43.207.**
38. Page 3/13 of below reference **43.156.**
39. Page 3/14 of below reference **43.21.**
40. Page '4' supra '**1**'.
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42. https://en.wikipedia.org/wiki/Regulatory_impact_analysis
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