From: UjaniGhosh@theiet.in
To: "Santanu Das" <jtadvbbpa-1@trai.gov.in>, "Sanjeev Kumar Sharma" <advbbpa@trai.gov.in>
Cc: SSanyal@theiet.org, sunphi@hotmail.com, "Mgupta ind" <Mgupta.ind@gmail.com>, rajudkm@gmail.com, "prashant bansal" <prashant.bansal@outlook.com>, SSanyal@theiet.org
Sent: Monday, February 27, 2023 5:04:16 PM
Subject: IET's response to Consultation Paper on Regulating Converged Digital Technologies and Services & Enabling Convergence of Carriage of Broadcasting and Telecommunication services

Dear Shri Sanjeev Kumar Sharma ji,

Greetings from the Institution of Engineering and Technology (The IET).

I am reaching out to you on behalf of the IET to present a response to TRAI's consultation paper on Regulating Converged Digital Technologies and Services & Enabling Convergence of Carriage of Broadcasting and Telecommunication services.

We would be grateful if you could take a look at the attached document with responses that have been provided by our experts in the **Digital Communications working group of IET Future Tech Panel.**

To give you a brief background, the IET is one of the world's largest professional societies for engineers, headquartered in the UK. Soon to turn 150 years, the IET works closely with industry, academia and government in its mission to engineer a better world. In line with this, the IET also has specific global initiatives around key sectors that are relevant to solving problems that impact the society at large. In India, the IET has over 13,000 members and has wide ranging activities in alignment with the overall global IET strategy that also includes sector focus in areas such as Future technologies. Future of Mobility and Transport, as well as the Future of Work. Eminent engineers like Shri Ratan Tata, Former Chairman Tata Sons, N R Narayana Murthy, Chairman Emeritus, Infosys and T V Ramachandran, President, Broadband India Forum (Ex-Resident Director, Vodafone) are Honorary Fellows of the IET. With our members, we are driving innovation and change in the fields of engineering and technology.

Founded in 2015 as the IET Internet of Things Panel, the IET Future Tech Panel is a neutral body to influence the evolving movement of emerging technologies in India and development of country-wide roadmaps and ecosystem building. The panel is led by Dr Rishi Bhatnagar, President, Aeris Communications India and works through 16 Working Groups currently –Digital Communication, Cyber Security, Water, Healthcare, Manufacturing, Retail, Skill Development, Smart Cities, Social Impact, Standards, Legal and Regulatory, BFSI, Energy, Artificial Intelligence, Blockchian, Robotics and Open Digital Innovation.
We look forward to having TRAI accept our views and responses against the consultation paper.

Thank you!

Ujani Ghosh
Manager- Thought Leadership and Policy

T: +91 (0) 80 40892201
M: +91 (0) 9538801050
theiet.in

IET India

Unit No 405 and 406, 4th Floor West Wing, Raheja Towers,
MG Road, Bangalore, 560 001
India

London | Stevenage | Beijing | Hong Kong | **Bangalore** | New Jersey

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Regards
Lieutenant Colonel Santanu Das
Joint Advisor (Broadband & Policy Analysis)
Networks, Spectrum and Licensing Division-I (NSL-I)
Telecom Regulatory Authority of India (TRAI Headquarters)
Room No 507, Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg, New Delhi (India) 110002
: +91 **9671711311**
☎ : +91 11 **23664254**

The Institution of Engineering and Technology

Future Tech Series

IET Future Tech Panel responds to

TRAI Consultation Paper on Regulating Converged Digital Technologies and Services & Enabling Convergence of Carriage of Broadcasting and

The Institution of Engineering and Technology

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With our members, we are driving innovation and change in the fields of engineering and technology. We research, investigate, review and analyse the industry's challenges, proposing solutions that will have a significant impact on the world for years to come. Read more about our Future Technology focus as well as our panels here: https://india.theiet.org/innovation-knowledge/. To become a volunteer and to contribute, please write to us at sectors@theiet.in

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IET Future Tech Panel response to TRAI's Consultation Paper on Regulating Converged Digital Technologies and Services & Enabling Convergence of Carriage of Broadcasting and Telecommunication services.

TRAI released a consultation paper **on Regulating Converged Digital Technologies and Services & Enabling Convergence of Carriage of Broadcasting and Telecommunication services** on January 30, 2023 requesting stakeholders to provide their comments on the various aspects related to the types of convergence and its impact on the economy and society at large, trends in the convergence space, global experiences of how developed markets have dealt with convergence etc. In India specifically, technology convergence at network, services and device level continues to face challenges due to absence of convergence at licensing, statutory, regulatory and administrative levels. The request was to comment on whether the present laws are adequate to deal with convergence of carriage of broadcast services and telecom services. Secondly, whether the existing laws need to be amended and finally whether we need a converged legal framework or not.

At the outset, the IET would like to thank the Telecom Regulatory Authority of India (TRAI) for its continuing efforts in improving connectivity and enhancing the adoption of digital technologies across the country. The recommendations in this document are a response by the Digital Communications Working Group of the IET Future Tech Panel if IET India to the aforementioned call issued by TRAI for their consultation paper on Regulating Converged Digital Technologies and Services & Enabling Convergence of Carriage of Broadcasting and Telecommunication services.

IET Future Tech panel responses

We would advocate the need for OTT players to be subject to light touch regulation so that we don't stifle innovation, especially now, when the technology and new solutions are in an early/evolving stage and yet to mature. Also, on licensing and other fees that Telcos are subject to, perhaps there should be a nominal cost that OTTs need to bear given that all these years they were getting a free ride on the Telecom Service provider network without incurring any charges. Billions of dollars of investment has been made by the service providers on infrastructure, spectrum, etc which has stretched the balance sheets of the service providers and given a huge amount of debt that the industry is reeling under. Given this, there is a need for the OTTs to absorb a certain percentage of the cost and work out revenue sharing models with the service providers to ensure Telecom service providers are able to sustain, grow and provide best in class and affordable network services to customers.

With increased Convergence, the need for collaborative, cross-functional and synergised working becomes an absolute imperative - across various Government Ministries/departments and Institutions. The formation of the "Inter-Ministerial committees" by DoT for 5G for Industry acceleration & adoption is a very good example. The need is for more of such cross-functional efforts and initiatives to be set up for achieving success & stronger socio-economic impact.

Contributors

Monika Gupta, Chair

Vice President Capgemini and Group 5G & Edge lead for industries & partnerships

Sunil David, Co-Chair

Advisor to IOT and AI Startups, Ex- Regional Director (IOT)- AT& T

Mohan Raju

Vice President - IoT, Reliance Jio

Prashant Bansal

AVP Sales - Communications & Media, L&T Technology Services Limited

For queries or comments regarding this document, please get in touch with please feel free to reach out to us at sectors@theiet.in. Read more about our work at india.theiet.org