



RSM/COAI/2017/072

April 25, 2017

Shri. Sanjeev Banzal,  
Advisor (NSL),  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan ,  
Jawaharlal Nehru Marg (Old Minto Road)  
New Delhi 110 002

**Subject: COAI submission on TRAI Paper on "Ease of doing  
Telecom Business in India"**

Dear Sir,

This is with reference to the Paper on "Ease of doing Telecom Business in India" issued by TRAI on March 14, 2017.

In this regard, please find enclosed our response on the paper.

We hope that our submissions will merit your kind consideration and support.

Thanking You,

Yours faithfully,

Rajan S. Mathews  
Director General  
COAI



**Response to TRAI Paper on  
Ease of doing Telecom Business in India  
Released on March 14, 2017**

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At the outset, we would like to submit that the Industry is highly encouraged by the fact that Honourable Prime Minister has placed the highest emphasis on promoting an enabling environment for **'ease of doing business'** and for attracting investments in the economy.

Ease of business is about finding solutions to challenges faced by industry. It requires simplicity clarity and uniformity in executive decisions and harmony between Policy, Regulations and contracts (licenses).

We suggest following points for the consideration of Government/Regulator with regard to Ease of Doing Business:

- a. Telecom Regulatory regime needs to be reworked based on past experience of 22 years to iron out the creases and have a simple structure and an inbuilt road map with timelines to give effect / real meaning to Ease of doing Business.
- b. TRAI ACT needs to be revisited and brought in line with other forward looking enactments to suit the dynamics of fast changing telecom sector. This will reduce scope for disputes and ensure certainty cutting down risks and create a commercial environment best suited for the growth of the sector.
- c. There is need for designated nodal officer as a single point to receive feedback from industry and navigate issues / matters within Government/Regulator in a time bound manner. Thus, we suggest for the designated high level officer to address the various Industry concerns. This should be an ongoing / continuous process to ensure quick intervention.
- d. Further, the immediate attention is required to review various processes at DoT & other Government organizations; these processes can be simplified to save on the resources, paperwork and man-hours. The same will lead to faster clearances, transparent working, considerable cost savings, thereby helping the digitization initiatives.

Some of the processes and Regulatory issues which should be reviewed for enabling a more meaningful contribution by the telecom industry are listed below:

**A. LICENSING RELATED ISSUES:**

**1. Import License for RF Equipment:**

- a. Presently, telecom operators are required to acquire import licenses for all RF equipment procured from outside the country. Without the same, Customs department does not clear the entry of RF equipment into the country. This requirement is a major bottleneck, as getting a clearance takes up to 1-2 months and during this time, the RF equipment are withheld by the Customs.
- b. Moreover, seeking import licenses for every LSA separately is also a problem; as due to this requirement, Licensees having Pan India presence cannot import RF equipment in large quantities and deploy the same in the different licensed areas. Moreover, moving RF equipment from one circle to another requires additional prior clearances. Therefore, the requirement of import license is adversely affecting the network planning (both short-term and long-term) and network rollouts of telecom operators.
- c. We believe that the whole objective of an import license is merely to ensure that the DoT is informed of the details of imported RF equipment as well as its installation in licensed service areas. We believe that this objective can be achieved by DoT by seeking periodic reports from telecom operators rather than requiring them to seek separate license for all RF equipment

**2. Simplification under the current process of taking prior approval for Remote Access (RA):**

- a. All the licensed telecom operators requiring remote access approval of their Indian locations through designated and identified foreign locations, have been duly submitting their respective applications as required vide letter dated December 7, 2007 under the extant RA policy as stated under Press Note 3 of 2007 dated April 19, 2007, which has been duly incorporated in all the telecom licenses. The current dynamic scenario requires the processes to be responsive in order to thwart cyber threats, meet the Quality of Service norms and for general hygiene / upkeep of the network.
- b. The current process of obtaining prior approval for remote access from foreign locations has proved to be extremely time consuming and leads to continued, unexplained and inordinate delays in obtaining approvals. This delay is a barrier in efficiently managing the networks, especially in case of disaster or failure of particular RA locations, having serious implications for maintenance of networks, as also from quality of service

perspective. Especially in the current era, cyber security threats have become a serious challenge and need to be tackled efficiently and proactively.

- c. The licensees have made substantial investment in their networks and they should be allowed to legitimately operate without any overbearing conditions which impair their ability to attend to issues in a proactive manner. The change in the process requested will provide the much needed operational flexibility to telecom licensees to operate their network and also in addressing / eliminating the risk from cyber-attacks and other security threats.
- d. We request that the existing process be changed to “**prior intimation**” as against the current process of seeking “**pre-approval**”. This will help the telecom licensees to proactively and reactively mitigate and thwart such threats and prevent any such cyberattacks on their network on a timely basis. It is suggested that the process of intimation, be introduced instead of the current process of obtaining prior approval of locations which is time consuming and builds in uncertainty into the process. The TSPs will continue to provide all the required information and in the manner as prescribed. Also the existing process be made more transparent and responsive from timelines perspective.

## **B. ACCOUNTS AND FINANCE RELATED ISSUES:**

### **1. Online Reporting and Payments:**

- a. The TSPs have to provide data in various formats to the DoT at different points. There is a need to make a portal for online reporting of data by the TSPs. This will help in generation of regular reports automatically in the required format and other reports may be generated based on the specific requirements. This can also help in various dashboards which can provide summary of the information present in the online portal.
- b. Payment of license fees and WPC payments, etc. should also be provisioned via wire transfer such as RTGS/online portal (through NTPR Bharat Kosh <https://bharatkosh.gov.in/>) as being done in case of Income tax/Service tax so that payment can be made by Licensees directly to the credit of DoT. With this DoT will get the funds on a real time basis, without any delay (normally of 4-5 days from the time of making demand draft by the operator and till the time credit of the same into the bank account of DoT). Such a practice shall benefit DoT also as it will get the float of money early which otherwise is locked with banks.
- c. Integrated single window payment process for the satellite spectrum covering ISRO/Antrix/NOCC/WPC/DOT License Fee/SACFA needs to be established. This will enable hassle free payment system and avoid billing discrepancies as well as Foreign Exchange calculation complexities.

## 2. Introduction of a system of LFDS:

- a. DoT should develop an e-portal for the submission of LF and SUC, Electronic/ online filing of licensees' returns as per the TRAI Recommendation dated 06.01.2015.
  - i. TRAI vide its Recommendation dated January 2015 on "Definition of Revenue Base (AGR) for the Reckoning of License Fee and Spectrum Usage Charges" made following recommendations:

*"The Authority is of the view that steps should be immediately taken by the DoT to introduce a system of LfDS w.e.f. 1st April 2015 and develop an e-portal for submission of LF and SUC by 1st April 2016. The Authority also recommends that the transition to the LfDS system may be initiated at the earliest, by putting in place a system for electronic/ online filing of licensees' returns."*

- ii. Though TRAI had recommended a transition to the LfDS system, there has been a little progress in this regard.
- iii. **We request TRAI to kindly reiterate its Recommendations dated January 2015 to DoT on LfDS and other AGR related for the early action by DoT**

## 3. Set-off of license fee paid on input services against license fee payable on output services:

- a. There must not be any double taxation on industry. However, this currently exists, as payments made for critical inputs like bandwidth are currently not allowed as deductions while calculating AGR on which license fee is payable by a telecom operator. This is even when the bandwidth provider is subject to license fee on revenue received from service provider. This could seriously hamper the objective of high internet & broadband penetration in the country and is grossly unfair to the telecom industry.
- b. Further, the telecom industry should follow the proven principles behind GST; wherein such tax/levy is payable at each step of Input Services and thereafter is adjusted or set off against such tax/levy payable by the recipient of such service.
- c. Accordingly, every provider of services, on which, as per license, is supposed to pay license fee to DOT, would charge the said license fee as a part of the invoice to the recipient of such services and deposit such license fee with DOT.
- d. The recipient of the service should be allowed to deduct said license fee, charged by input provider, as per point 'c' above, out of total license fee payable by the recipient. This would thus be on the same line as G.S.T. or service tax where set off of amounts

paid on inputs are allowed against amount of G.S.T. or service tax payable on the output.

e. **Thus, like in the case of GST, the set-off of license fee paid on input services against license fee payable on output services should be allowed**

4. **Doing away with multiple audits:** It is well appreciated that conducting an Audit is a time consuming exercise involving substantial resources. TSPs already have their quarterly and annual audits by the Statutory Auditors as they follow the highest standard in corporate governance. We believe that these audits are sufficient and there should not be duplication of efforts by multiple audits in a given financial Year. The same will help in saving the duplication of efforts, wastage of time, manpower and precious public resources.

### C. SPECTRUM MANAGEMENT AND WPC ASPECTS:

#### 1. **SACFA related Issues:**

##### a. **Reduction in number of applications leading to cost Optimization:**

- i. Since the main aim of SACFA is to ensure aviation safety and security which has been addressed by taking one clearance for a tower/ antenna / site. There is no additional benefit by evaluating the same site / tower again and again even when an additional antenna is added to the same site / tower as it doesn't affect the current status of aviation safety and security. The requirement of additional SACFA clearance for the same site/tower location should be done away with. Also, the MW sites SACFA application parameters need to be merged with RF sites so as to avoid duplicity in filing.
- ii. Further, there is no need to obtain SACFA clearance for each and every site deployed in the network as all sites do not affect the aviation safety and security aspects. Thus, it is suggested as follows:
  - SACFA to be obtained only for those sites which are <3 Km from the nearest Airport and for the sites having height >40 m between 3-10 Km of the airport.
  - Only intimation to be given to SACFA secretariat for sites <40 m height & distance >3 km from Airport and for the sites which are >40m in height but beyond 10 Km from the nearest Airport.
- iii. Paperless submission of SACFA application is also proposed with online clearance, as this will enable a faster clearance and hence much faster roll-out by the industry

- iv. The complete working of SACFA should be made paperless with a Portal similar to Tarang Sanchar which is currently being used for EMF compliance. The above suggestion will not only bring huge cost savings to the industry but would also optimize the overall work to be done and would enhance work efficiency in terms of faster approvals at WPC.

**b. Reduction in the SACFA Application Fee:**

- i. Currently, Licensees have to pay Rs. 1000/- per application while applying a SACFA through WPC online website/ TSP has to pay application fee separately for GSM and MW (link to link).
- ii. In addition to the above, TSPs are mandated to take clearance for every antenna being added on any existing site/ tower for which SACFA clearance has already been obtained from WPC under the “Additional Antenna” category.
- iii. The current Application fee and its structure need to be reviewed.
- iv. It is suggested that WPC should charge Rs 1000/- basis per 100 application lots instead of each application to compensate the administrative / website maintenance charges.

**c. Single clearance for multiple technology application:**

- i. TSPs are currently in the process of deploying higher/advanced technologies and need to send multiple applications for SACFA clearance for the same tower. This becomes more complex in case of sharing of the same tower by other TSPs.
- ii. In order to enable ease of doing business, instead of multiple approvals for each application for a particular tower, single clearance should be given in a time bound manner.

**2. Increase in RF transmit power from BTS:**

- a. At present, TSPs have been allowed to transmit only at 20 watts power. This is has been set historically from the time when GSM, operating with a channel bandwidth of 0.2 MHz, was the predominant technology.
- b. Unlike GSM where the transmitted power is concentrated in a bandwidth of 0.2 MHz, the power is distributed in a much wider bandwidth, typically 5 MHz, in case of 3G/4G (LTE).
- c. Further, all 3G/4G technologies are operating in different frequency bands and the free space losses are different in different frequency bands.

- d. TSPs have been requesting to allow transmission power from BTS to be in the range of 60-80 Watts power instead of presently allowed 20 Watts. The lower transmit power reduces the network coverage and results in inefficient use of the spectrum.
  - e. The radiated power from BTSs is already being monitored via the EMF guidelines, which prescribes the maximum power allowed to be received at any place.
  - f. Further, while assigning BWA spectrum, DoT has permitted different BTS output power ranging from 10 watts to 40 watts to different operators, which creates non level playing field and needs a correction.
  - g. **TSPs should be allowed to configure 60-80 W transmit power while maintaining compliance to the EMF norms.**
3. **Assignment of spectrum:**
- a. Single window clearance process needs to be established for the Satellite spectrum assignment covering ISRO/Antrix/NOCC/WPC/SACFA clearances.
  - b. Service Providers shall be allowed to use the Spectrum as per their business and operational requirements including shuffling of carriers, change of Modulation, Data rate, FEC, etc. within their allocated spectrum whenever necessary.
4. **The Wireless Planning & Coordination (WPC) Wing of the Ministry of Communications clearances:** There is a need to implement time bound clearances and subjects which are time barred should be deemed as cleared. Up to Feb 2017, there was a manual process of WPC clearance and was more people dependent than process dependent. From Feb 2017, a new online system has been introduced, however, all process prior to issuance are manual and create delays.
5. **WPC Clearance for Demo license:** Global companies import products and solutions for demo purposes during exhibitions, events and for trials with customers. The demo license process is also complicated which requires submission to Local RLAs who send physical applications for approval to DOT HQ. The lead time for such demo licenses stretches beyond 5-6 weeks. We request that the process of giving demo licenses for non-commercial purposes and for exhibitions, demos, events and trials should be expedited and issued in a time bound manner with clear guidelines.

#### D. TARIFF & OTHER OPERATIONAL ISSUES:

1. **Introduction of M Bill enabling replacement of hard copy of mobile bill as default option for postpaid subscribers:**
  - a. We are of the view that the introduction of mobile bill (M Bill) or e- bill as a default option for the postpaid subscribers would provide a much needed boost to the Government of India's efforts towards digitization.
  - b. The M-bill option has been worked out for such customers who may not have an email account for receiving the telephone bill.
  - c. M-bill is not only environment friendly but also leads to cost reduction for the telecom service providers. These options will provide support to the Government's policy objective of Digital India as well. At present, the 46<sup>th</sup> amendment to the Telecom Tariff Order (TTO) mandates service providers to provide a hard copy of the bill by default to the customer. There is no provision to provide the customer the default option of paper less bill in form of E-bill or M-bill.
  - d. **With the introduction of M-bill as another option for paperless billing, it is requested that the extant 46<sup>th</sup> TTO may be amended so that M-bill or E- bill can be considered as default option for postpaid billing.**
2. **Discontinuation of non-significant Directions and Regulations:** Various directions and guidelines issued by DoT/TRAI or any other concerned authority in the past which seem non-significant in current scenarios should be discontinued. A few such directions/guidelines are mentioned below:
  - a. Tariff is not a fixed component and it varies continuously basis the market requirements and also all tariff details or contact information pertaining to complaint Redressal are already been updated by service providers on regular basis. Therefore, TRAI's mandate for the publication of such details in newspapers twice in a year should be discontinued.
  - b. As customer is free to migrate to any plan after enrollment, basis his/her requirement; the requirement of Tariff Enrollment Form collection at the time of subscriber acquisition should be discontinued.
  - c. All other existing Regulations and guidelines which do not hold sanctity in current highly competitive market should be discontinued on priority basis.

## **E. VERIFICATION RELATED ISSUES:**

### **1. Aadhaar based e-KYC for Outstation customers:**

- a. Presently, Aadhaar based e-KYC verification and re-verification of existing subscribers is not allowed for outstation subscribers (which is a significant portion of subscriber base). There seems to be no valid reason to restrict the Aadhaar based e-KYC process for issuance of SIM card for mobile connection to the home state where the subscriber is registered and disallow its usage in any location outside the home state. More so when the Aadhaar based e-KYC is a safe and secure way of verifying a customer irrespective of his home location.
- b. There is a large population of subscribers (Government officers / Armed Forces personnel, Central Police Organization personnel (CRPF, BSF etc.)/ working professionals / migrant population) who often by the nature of their employment have to be outside their home state and have obtained mobile connection in the new locations and cannot get themselves re-verified through Aadhaar based e-KYC – such subscribers may not be updating their address due to the nature of their jobs which changes periodically. These subscribers would not be able to get themselves re-verified through e-KYC. Students travel outside their home states for higher education. While they may have obtained SIM card through the conventional process which allowed them to get enrolled as outstation subscribers, they will not be able to get themselves re-verified as their Aadhaar carries their home state address which is their permanent address.
- c. TRAI in its recommendation on ‘Applicability of e-KYC process for existing mobile subscribers as well as outstation customers’ after reviewing the process of Aadhaar based activations has already recommended that Aadhaar based e-KYC should be permitted for outstation customers. We request TRAI to recommend the same again.

### **2. Subscriber re-verification through E-KYC:**

- a. Based on Hon’ble Supreme Court Order, the DoT has issued guidelines for re-verification of all existing subscribers through Aadhaar based e-KYC. All existing subscribers of all the TSPs were already verified as per the existing guidelines issued by DoT in 2012, which were based on Hon’ble Supreme Court Order (Avishek Goenka PIL). During that time, various rounds of discussions were held between the Government and industry to formulate the process before submission to the Hon’ble Supreme Court. However, in the Lokniti Foundation writ petition, no discussions were held with the industry prior to making submissions to the Hon’ble Supreme Court. However, in view of the Hon’ble Supreme Court Order and the instructions issued by DoT, our member operators will embark on the journey and put in their best of efforts to carry out this re-verification exercise. There are also many impediments to carrying out the e-KYC based re-verification:

- i. E-KYC not allowed for outstation
    - ii. E-KYC not possible for foreign nationals
    - iii. Aadhaar penetration in some service areas is very low
    - iv. Time taken for roll outs
    - v. E-KYC not required for enterprise and postpaid customers
  - b. Looking at the volume of existing non e-KYC subscriber, and more importantly given that the industry is adding about 40 mn gross new subscribers every month, approximately 15 mn new paper CAF, which will translate to 150 mn paper CAFs till Feb 2018 which will again have to be re-verified based on e-KYC. Thus, the intent of 100% base being e-KYC verified will be left meaningless and will become a never ending exercise. Despite the intent of the industry, the end result may not be achieved. Even with current numbers, the industry would be re-verifying over 900 mn subscribers, which will be costing the industry over 2500 Cr. and huge monumental effort, which seems almost unachievable within 1 year period.
3. **E-acquisition of Enterprise Business Customers and acceptance of optical/digital signatures:**
- a. E-acquisition of enterprise customers through on-line web portals/e-CAFs should be allowed in place of existing cumbersome process of hardcopies collection of CAFs and other documentation proofs.
  - b. Optical/digital signatures should be allowed for subscriber acquisition and various contract executions. This will ensure the faster execution of the contracts and subscriber acquisition processes.
4. **E-collection and storage of all subscriber documentation:**
- a. E-collection and storage of the subscriber documentations should be allowed by the concerned authorities instead of the existing mandatory requirements of storage in hard copies.
  - b. This will be an environmental friendly step and will help service providers to reduce their cost in terms of warehouse space/charges and also the cost involved in collection, transit and storage of hard copies.

**F. EQUIPMENT MANUFACTURING AND TESTING RELATED ISSUES:**

- 1. **Electronics Manufacturing Ecosystem:**
  - a. Telecommunication technologies are changing rapidly with time and have advanced design & development needs to cope up with the market demands and trends.

Presently, India does not have any FAB unit to support the manufacturing and supply of silicon components for domestic consumption. Today no single country has the capability to manufacture all the raw-materials required for a telecom product or to produce all the telecom products in a solution. These procurements are met from multiple countries; multiple suppliers

- b. India's manufacturing has got to be addressed as a complete ecosystem. Easy availability to quality components and Raw Materials is possible only if global raw material suppliers are incentivized to manufacture domestically. This will accelerate manufacturing and build widespread manufacturing capability.
- c. Thus, an eco-system comparable to the global manufacturing ecosystem needs to be created in India, which should include:
  - i. The Government of India should encourage the Global Silicon Manufacturers to manufacture the Silicon in India; once the FAB Unit is ready, it can supply to meet domestic needs as well as to export to rest of the world as a HUB for meeting the global requirements.
  - ii. Cumbersome paperwork around import and export should be removed as the same will lead to cost effective and efficient delivery of products from a Make in India plant.
  - iii. Logistics/ warehousing/ global distribution hubs.
  - iv. 24X7 customs clearances, fast track clearances for manufacturing.
  - v. Easy and free movement of new and used capital goods/ test equipment in and out of the country.
  - vi. Raw material import and re-export of unused/excess/obsolete (subject to strictly adhering to WEEE take back guidelines and audit by authorities at regular intervals).
  - vii. High tech faulty products for Repair and Return business targeting global volume.
  - viii. Fast track and incentivize material hub concept (Free trade warehousing zones).

## 2. **Safety and Security testing requirements:**

- a. Addressing redundant and burdensome safety and security related testing requirements for ICT products will reduce compliance costs for telecom operators and ensure access to cost-effective and cutting-edge technology. We strongly recommend that GOI should:
  - i. Reform Compulsory Registration Order (CRO)/Safety Testing requirements to remove bureaucratic delays, lower compliance costs and improve the ease of doing

business for telecom operators. Specifically, MEITY should expand the Highly Specialized Equipment Exemption to cover all professional equipment; eliminate factory-based registrations, which only creates repetitive testing for the same products, and take meaningful steps to simplify the CRO paperwork

- ii. Avoid creating redundant and India-specific security testing requirements for ICT products purchased by telecom operators. We urge DoT to work closely with all stakeholders, including global telecommunications service providers and equipment vendors to ensure the implementation of the telecommunications' security provisions which do not undermine basic IP protection or create obligations outside of global norms that will isolate India.

**G. TEC INTERFACE APPROVALS:**

1. Interface approvals requirement for the Point of Interconnect (POI) with BSNL and MTNL should be discontinued. This is a requirement, which was established during pre-economic liberalization in India and pre-national telecom policy & telecom reforms, where DoT/ BSNL was the only provider of fixed telephony services as a national carrier. This policy of Interface Approval requirement to induct or interface equipment with the National carrier would have been implemented to stop non-standard equipment that could cause damage to the switching equipment, when "Solid State Relays" are operated (may be to prevent relays generating high currents asymmetrically damaging the connected apparatus).
2. With the advancements in technology, products being developed, miniaturization of silicon components and most importantly the products being manufactured by the reputed global manufacturers based on international standards such as ITU, 3GPP, ETSI, ANSI etc.; it is highly unlikely that an equipment being interfaced with BSNL/ MTNL would cause any damage; when the same is not causing any damage to private telecom operators when they are interconnected with each other at their POIs.
3. Also, time required for this approval stretches beyond one year at times and DOT needs to review this practice and discontinue it. Operators have a robust system under which every node is thoroughly tested before induction. No testing is required if two Private operators interconnect, hence there is no rationale for this to be mandatory for POI with BSNL / MTNL.
4. **We therefore request Government of India to abolish the age old requirement of TEC I/F approval as part of improving ease of doing business conditions.**

## H. OTHER IMPORTANT ISSUES:

### 1. **High Interference due to installation of illegal Repeaters, Boosters, Jammers and faulty / leaky equipment of Cable TV operators:**

- a. TSPs across all circles face high interference due to illegal transmission by repeaters/boosters and faulty / leaky equipment of cable TV operators. This interference which is of a magnitude of -10 dbm to -50 dbm is affecting quality of service parameters across all services. The interference from repeaters/boosters/jammers and faulty/leaky cable TV equipment have become so prominent that it prevents the licensees from providing flawless telecom services and even in launching of services.
- b. While the WMO wing of TERM Cell have visited the impacted locations and have come across illegally deployed repeaters/boosters. However, they have expressed their inability to act against such persons/organization in possession and operation of such repeaters as well as against the persons selling such repeaters citing constraints with the powers conferred to them.
- c. However, we believe that DoT is empowered to take action against such persons/organization as per the power conferred by The Indian Wireless Telegraphy act 1933, to DoT for removal/confiscation of the illegal transmission equipment:
  - Clause 6 (1) (A) - "Offence and Penalty":

*"Whoever possesses any wireless transmitter in contravention of the provisions of Section 3 shall be punished with imprisonment which may extend to three years, or with fine which may extend to one thousand rupees or with both"*
  - Clause 7 – "Power of search":

*"Any officer specially empowered by the Central Government in this behalf may search any building, vessel or place in which he has reason to believe that any wireless telegraphy apparatus, in respect of which an offence punishable under Section 6 has been committed, is kept or concealed, and take possession thereof"*
- d. **In light of above, the Government needs to take the following action:**
  - i. **To ban the sale of illegal repeaters and direct TERM/WMO wings to conduct raids to check this.**

- ii. **Authority should be granted to TERM/WMO wings for seizure/confiscation of illegal Repeaters, Boosters, Jammers and faulty / leaky cable TV equipment causing interference.**
  - iii. **Time bound resolution of identified Interference cases, so as to provide flawless services.**
2. **Review of Need for Submission of Biennial Self-Certificate Submission:** The National EMF Portal – Tarang Sanchar ensures tracking of EMF compliance at all times. The Portal thus offers a comprehensive platform to the TERM Cells as well as TSPs monitor the latest compliance status of every site. Therefore, the requirement to submit Self-Certificates biennially to be evaluated and reviewed. Furthermore, since most of the sites are getting routinely audited as well as the new and updated photographs and site data are submitted by the new TSPs there seems to be no need to carry out fresh EMF biennial after every 2 years.
  3. **Review of Need for Submission of Upgrade Self-Certificate by sharing operator(s):** Only the tenant who carries out an upgrade or a new site addition shall be submitting an upgrade self-certification. The TSP shall be updating the portal for the changes being made and notifying all other tenants to this effect using the portal. There shall be no need for other tenants to submit an upgrade certification for the same site.
  4. **Restrictions on Fiber deployment needs to be removed:** The present rules doesn't allow fiber to be laid using electric poles due to various restrictions imposed by local bodies like Municipal corporations etc. on the Discoms. Discoms are not allowed to generate commercial revenues using this infrastructure (that includes even commercial hoardings etc.). We request that there should be a PAN India provision to allow TSPs and their partners to lay Fiber using the existing electric poles. This will ensure faster deployment of fiber in India and help the Industry to overcome the delays which are still being faced on the ground due to timely Right of Way (ROW) and other related approvals.
  5. **Exports and Imports take longer for clearances versus other countries which take only 1 or 2 days:** To keep mobilizing the Industry and economy, availability of Customs Clearance 24x7 all around the year would be very beneficial. This will be a very important step in optimizing productivity of the country and economy and ensuring that resource wastage and idling due to unavailability of material because of long Customs holidays becomes a thing of the past.

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