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Sub: Consultation Paper on Encouraging Innovative Technologies, Services, Use Cases,
and Business Models through Regulatory Sandbox in Digital Communication Sector

Respected Sir,

Juniper Networks respectfully submits these comments in response to TRAI's consultation paper on encouraging innovative technologies through regulatory sandboxes. We commend TRAI for initiating this process and recommend that TRAI use regulatory sandboxes to encourage innovation, open standards, and competition in India's digital sector.

Juniper Networks is a multi-national corporation that develops high-performance networking hardware and software spanning 5G, wireless, routing, switching, security, and network management solutions. We are proud of our over 3,000 employees in Bengaluru who help Juniper serve customers all over the world, including major telecoms and enterprises across India.

We agree with TRAI that easing regulatory burdens can incentivize companies and other stakeholders to invest more in innovation and help spur India's digital evolution. To achieve this goal, we recommend that TRAI implement two related requirements for applicants seeking to benefit from these incentives.

First, any regulatory incentives should favor solutions developed on open standards. Open standard protocols allow products from different vendors to interoperate, which makes it possible for customers (telecoms, enterprises, etc.) to build networks from the best products of multiple vendors. When customers demand solutions based on open standards and can choose from multiple vendors, vendors are encouraged to innovate and compete with each other. On the other hand, when digital ecosystems are based on proprietary protocols, customers are reliant upon single vendors and can be subject to their legacy technology and higher prices (because proprietary protocols are not subject to competition).

Similarly, applicants for these sandboxes should be required to certify or demonstrate that their solutions will interoperate with those of other industry participants. While deployment of open standards can enable product interoperability, vendors still can configure their products to function more effectively via proprietary protocols. For that reason, it is critical that solutions benefiting from streamlined regulations be proven in open standard environments.

Thank you for your consideration of our comments. If you have any questions about this submission, please feel free to contact me at spgarg@juniper.net.

Kindest regards,

A handwritten signature in black ink, appearing to read "Sampak P. Garg".

Sampak P. Garg
Senior Director
Government Affairs