
Subject: Fwd: Inputs on Consultation Paper No. 01/2018, NTP 2018

From: SK Singhal <sksinghal@traf.gov.in> on Sun, 21 Jan 2018 22:12:29

To: advadmn@traf.gov.in, advmn@traf.gov.in, V K Agarwal <vkagarwal23@rediffmail.com>

1 attachment(s) - Note_for_Prime_Minister__on_new_ICT_Policy.docx (16.74KB)

Sent from [Blue](#)

On Jan 21, 2018, at 6:21 PM, Rakesh Mehrotra <mehrotra.r@gmail.com> wrote:

Dear Sir,

Following are my comments on CP No. 01/2018 on NTP 2018:

TRAI Consultation paper on NTP 2018 is an excellent document that covers most of the aspects of telecom sector. Following suggestions may help in preparing a robust, implementable and accountable NTP/ ICT policy in this age of convergence, when the traditional boundaries of telecom, IT, broadcasting and artificial intelligence are perishing:

1. There is an urgent need of an umbrella National ICT Policy. All specific sectorial policies such as NTP, Software Policy, Electronic Manufacturing Policy, Software and data security policy, Space communication policy etc etc must be harmonized to become part of this umbrella policy (to eliminate conflicting situations while implementation). A note sent to PMO in this regard is attached for kind reference.
2. The policy must be followed by detailed working documents and related processes in order to avoid arbitrariness.
3. While taking decision, the concerned officer must record the reasoning "what will be the impact of this decision, both from short term and long term perspective, on Indian innovation, manufacturing and service sector point of view. Such decisions must be published on relevant portals, in near real time basis, to avoid arbitrary decisions.
4. TRAI Act must be amended to make it responsible to PMO/parliament, take care of all TCT related issues and mitigate legal battles, provide more decisive powers, 50% of TRAI members must be eminent experts from outside of the government setup.
5. The recommendations of TRAI must be made binding on relevant ministries.
6. The regulatory impact assessment must be mandated for all major decisions having financial impact of more than 100 cores. RIA must be conducted in a very transparent manner. The power of exemption, if any, under exceptional circumstances, must vest with PM/parliament.
7. 5% of total ICT budget must be dedicated for innovation, incubation, local IPR creation. Indian designed, developed and manufactured products must be given preferential market access. The national ICT R&D initiatives, both from applied engineering and fundamental science perspective, must be institutionalized.
8. A separate Public Protection and Disaster Relief (PPDR) network must be developed. (India is facing state sponsored terrorist activities. In order to derail India from the developmental agenda such activities are expected to increase in near future. Hence it is necessary to develop a separate PPDR network).

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Note on new ICT Policy

1. Last couple of years have witnessed convergence of Telecom, Media and IT (ICT) technologies, and ever increasing miniaturization and complexities. This has led to fusing of the existing market segments, and is creating new market segments.
2. ICT depends on Internet Protocol (IP) technologies. Due to politico-economic reasons, the rules/ architecture of IP were made not to follow the traditional governmental controls on communication. Hence, under the present circumstances, we find there are two independent domains - physical world and the cyber world. The traditional rules of the physical world can't be applied to the cyber world.
3. IP and software based new complex technologies and their quick deployment is creating a phenomenal challenge for the national policy makers and the regulators.
4. In this fast changing environment, the traditional way of making and implementing policies and the regulations, (without much clarity of associated technological glitches/ hidden features) has created a situation where we again find ourselves in a choking situation.
5. In spite of Hon'ble Prime Minister's vision of India First and Digital India, due to existing policies and their skewed implementation, we are failing to achieve the desired goal.
6. Under these circumstances, there is an urgent need to define and institutionalize an **Umbrella National ICT Policy**, where all other related sectorial policies such as telecom policy, spectrum policy, electronics manufacturing policy, software development policy, cyber security policy, related aspects of space policy, semiconductor infrastructure development, solar energy, ICT (telecom, media and IT) infrastructure development policy, sectorial research and development policies, related import and export policies etc. **must be developed in a way as to harmonise with each other, in order to fulfil the national objectives as defined in the 9 pillars of Digital India and India First programmes** by the Hon'ble Prime Minister.
7. To achieve this objective, it is also necessary to institutionalize and define, in writing, the implementation procedures of all policies and regulations using policy/regulatory impact assessment methodology to

avoid subjectivity, arbitrariness, political exemptions, and lobbying interests.

8. An apex body, comprising of an advisory committee of well-known Indian ICT professionals, having no direct/indirect business interest in any related sectors, headed by Chief National ICT Officer (a senior technical bureaucrat) must be formed to oversee the policy implementation as suggested by the advisory committee. The job of the Chief National ICT Officer would entail the implementation of the ICT policy, course correction, and the redefining of goals per advice of advisory committee, and the officer shall report directly to the Prime Minister.

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