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Subject: Consultation paper no.9

With regards

Yours faithfully

Padam Mohan Misra

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Consultation Paper on Encouraging Innovative Technologies, Services, Use Cases, and Business Models through Regulatory Sandbox in Digital Communication Sector by upobhokta sanrakshan Kalyan samiti, kanpur

A.1 The digital communication industry is a key driver of economic growth and development in India, contributing significantly to the country's GDP and employment. With the rapid advancement of technology and the emergence of new players in the market, there is an increasing need to promote innovation and entrepreneurship in the sector. Promoting innovation in the digital market is crucial for economic growth because it leads to the development of new and improved products and services, increased productivity and efficiency, and the creation of new industries and job opportunities. It drives competitiveness, higher profits, and investment in the economy. The digital market is transforming the way we live and work, and encouraging innovation in this sector is necessary for entrepreneurs, start-ups, and SMEs to compete with established players, stimulate economic growth and create new jobs and opportunities.

A.2. Continuous innovations are happening which at times may not fit in with the existing licensing and regulatory framework. Many a times testing innovations may require access to live customers and real time data. The conventional approach of doing Pilots or conducting lab tests which neither permit any exemption from regulatory and licensing requirements nor provide access to live telecom resources and real time data may not fulfill the purpose in such cases.

A.3. In addition to use cases designed and developed in India, use cases that are designed and developed in the western world may be required to be tested again in India. Such product or service may not work in India due to the massive scale of the Indian market, cost-related constraints, diverse socio-economic profiles, and other factors.

A.4. Therefore, there is a need to have a robust, well-defined, and well-oiled framework for testing innovations that can assure a high probability of commercial success in the country after successful deployments in test environment. Testing innovations under real-world conditions in India can help identify potential issues and adapt the use cases to meet the unique needs of the Indian market, which can ultimately lead to greater success in terms of adoption and profitability. Additionally, a robust testing framework can also help attract investment and create opportunities for Indian companies to lead innovation in the digital communication industry.