From

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To

> Shri Sunil Kumar Singhal, Advisor, Telecom Regulatory
>
> Authority of India

sub: comments on the proposed inputs for National Telecom Policy, 2018

Dear Sir,

      Attached are my inputs for the comments on structure and
contents of the proposed inputs for National Telecom Policy, 2018.

Thanks,
Vishnu
email: vishnu.n@ieee.org

**Q.1 Stakeholders are requested to give their comments on structure and
contents of the proposed inputs for National Telecom Policy, 2018, clearly
outlining the specifics along with justification.**

A.1) This set of proposed inputs is well structured and covers most of the important aspects.
However the following aspects are not given the due importance that it deserves:

A1.1) How much of the policy formulation is based on analysis of existing data?
Which data has been analysed for this purpose?
(eg: is there a GIS (geographic information system) tagged data for wireless coverage in India? Else
how are we going to measure the objectives?)

A1.2) What is the role played by technology in policy formulation? Multiple times the keywords of
5G and IoT appears in the input. While this is very good, it is not clear whether there are underlying
assumptions that these technologies are the best suited for Indian market or the socio economic
impact of IP licensing for these technologies. Yet another good example is edge computing
platforms. A wise use of such technologies can indeed reduce the dependency on "throughput" or
"speed" intensive technologies. Finally I would like to point out that even in developed economies,
the role of community networks are being recognised as alternatives to others.

A 1.3) Test beds and research are mentioned, but the role played by opensource, open APIs, open
data are missed. These are important for ecosystem creation which will help in advancing
indigenous technologies.

A 1.4) sustainable development and deployment of technologies need to be given adequate space in
the policy.

A 1.5) financial incentives for the development of Standard Essential Patents (SEPs) in the field of

telecommunication services and systems is mentioned but making the IPR and standards process open and accessible to startups is important to be scalable in achieving our goals.

A.1.6) "By making TEC and TSDSI responsible for development and enforcement of standards for telecom products and services": how inclusive and startup friendly are these? standards should be openly developed and consultation process should be there.

A 1.7) "By allocation of spectrum for demonstration and experimental purpose on expeditious basis" this should be open to startups and academics.

Q.2 Stakeholders may also suggest any other issue related to Policy Framework which stakeholders feel is important for growth of telecom sector, along with justification.

A2.1) "creation and incorporation of Indian IPRs in global standards" is mentioned. But what are "Indian IPRs?": authored by Indian citizens but filed in USPTO classify as Indian IPRs? or authored by foreigners in Indian PTO classify?

A 2.2) NTP (National Telecom Policy) can no longer be independently seen, agnostic to, policies in other verticals (eg: health care, infrastructure, transport, etc). This is due to the changes in technology landscape such as IoT. This will in near future necessitate a unified approach, closer coordination, research and collaboration. My sincere request to you, therefore, is to pave or lead the way in that manner and provide, via this policy, an enabling mechanism for such an integrated approach.