

**Asia Internet Coalition (AIC) Industry Submission to Consultation Paper on
'Regulating Converged Digital Technologies and Services – Enabling Convergence of
Carriage of Broadcasting and Telecommunication Services'**

17 April 2023

To
Shri Sanjeev Kumar Sharma,
Advisor, Broadband and Policy Analysis
Telecom Regulatory Authority of India (TRAI)

The [Asia Internet Coalition](#) (“AIC”) is an industry association comprising leading internet and technology companies. We seek to promote technology and policy issues in the Asian region, and we are fully committed to the cause of a safe and open internet.

AIC would like to thank the Telecom Regulatory Authority of India (“TRAI”) for providing us with an opportunity to submit our comments and counter-comments on the consultation paper on “[Regulating Converged Digital Technologies and Services – Enabling Convergence of Carriage of Broadcasting and Telecommunication Services](#)” dated January 30, 2023 (“**Consultation Paper**”) and referring to the [Press Release](#) No 28 / 2023.

As regards the above, we have set out our detailed responses to specific observations, as well as questions posed by the TRAI in the Consultation Paper. We hope that TRAI finds our submissions useful in charting out the future course for the regulation of inter alia the carriage of broadcasting and telecommunication services.

Q1. Whether the present laws are adequate to deal with convergence of carriage of broadcasting services and telecommunication services? If yes, please explain how?

OR

Whether the existing laws need to be amended to bring in synergies amongst different acts to deal with convergence of carriage of broadcasting services and telecommunication services? If yes, please explain with reasons and what amendments are required?

OR

Whether there is a need for having a comprehensive/converged legal framework (separate Comprehensive Code) to deal with convergence of carriage of broadcasting services and telecommunication services? If yes, provide details of the suggested comprehensive code.

Response:

In question to Q1, we are of the view that the present laws adequately deal with the convergence of carriage of broadcasting and telecommunication services and any challenges arising thereof.

That being said, wherever the Central Government has felt there is a need to plug gaps as regards the existing legislations, it has taken proactive steps [(such as, through the introduction of the draft Indian Telecommunications Bill, 2022) (“**Telecommunications Bill**”)] and is already at advanced stages of stakeholder engagement and consultations for bringing in modern, principle based sectoral reforms. Therefore, there is no need to have a new and separate converged legal framework to regulate the carriage of converged technologies and service in the broadcasting and telecommunication sectors.

We have set out our arguments in detail below:

- (i) **Limited scope of the Terms of Reference:** At the outset, and before delving into our more detailed comments, we note from a review of the letter dated August 08, 2022, sent by the Department of Telecommunications (“**DoT**”) to the TRAI, that it had requested the TRAI to provide its recommendations on, amongst other things, the convergence of carriage of broadcasting and telecommunication services (and also on related matters, such as the legal, licensing and regulatory frameworks in the broadcasting and telecom sector, etc.). However, the TRAI appears to have gone beyond the restricted scope of the terms of reference outlined by the DoT for the TRAI for the purposes of the Consultation Paper. In this regard, we note that the TRAI has accordingly also given suggestions in respect of the IT sector as well as for the regulation of content together with carriage. Particularly, in respect to TRAI’s suggestion to jointly regulate carriage with content through a converged regulatory authority – we believe that it is neither an administratively workable solution nor practically feasible to carry out.

We would like to point TRAI towards the report by Body of European Regulators for Electronic Communications (BEREC) - [Report on OTT services](#). This BEREC report focuses on the relation between OTT services and electronic communication services (ECS). The BEREC report clearly illustrates the differentiation between "push" and "pull" services (carriage versus content), and defines an OTT service as “content, a service or an application that is provided to the end user over the public Internet.” This means that the term OTT does not refer to a particular type of service but to a method of provision, namely provision over the public Internet. The provision generally occurs independent of the Internet access provider in control or distribution of the service. BEREC distinguishes three types of OTT services. This results in a taxonomy of OTT services that consists of (a) OTT-0 services, which are OTT services that qualify as ECS, (b) OTT-1 services, which are OTT services that do not qualify as ECS but do potentially compete with ECSs and (c) OTT-2 services, which are the remaining category consisting of OTT services that are not an ECS and do not potentially compete with ECSs.

This is primarily because of the reason mentioned below:

- a. **Content regulation is complex and challenging by itself:** Firstly, the regulation of content requires a comprehensive evaluation of a range of factors (such as, societal practices and norms, and also legal maxims and related jurisprudence on the right to free speech and expression etc.). Further, content, as such, also falls within the domain of legislative frameworks - including those concerning intellectual property rights (again, with its own set of legal and policy nuances) - which cannot (in any event) be easily reconciled within a converged regulatory regime. Further, in our opinion, various regulatory authorities operating within the ministerial supervision of ministries such as the Ministry of Information and Broadcasting (“MIB”) have also over time gained the requisite administrative competence and skill-sets to deal with the unique challenges of content regulation. In view of the reasons set out above, we request the TRAI to limit its recommendations that it makes pursuant to this Consultation Paper, to only carriage.
- (ii) **Convergence is not a regulatory panacea for sectoral weaknesses:** The TRAI in the Consultation Paper suggests that convergence in regulatory frameworks will provide added impetus to India’s economic growth as it will increase the confidence of international investors and enable the penetration of technology. The pathways to sustainably achieve these two goals and become a trillion-dollar digital economy require the adoption of the most efficient and effective regulatory modes and methods. In our view, convergence of regulations/regulators is the not best policy option available to us. Instead, we believe that governmental focus should be on inter alia ensuring that: (a) existing and upcoming relevant rules and regulations are drafted in plain, understandable and simple layman language, and are aligned with their intended objectives; (b) overlaps in statutory language and application of the law are avoid to the extent possible through close coordination between the concerned departments and regulators; (c) the concerned regulators are empowered to build their present capacities further for effectively regulating new and emerging technologies (through activities such as, public engagement with stakeholders and regulators in other jurisdictions); (d) limited regulations are imposed (and only to the extent necessary) with adequate weight and consideration given to facilitating the market entry of new players across industry sectors (and, thereby, expanding consumer choices in the market) and so on. In light of the above, and in our view, any effort to overhaul regulatory frameworks (including, creating a single unified regulatory regime/regulator) should be initiated only after a phase-wise, careful, and considered study of its impact (such as in the long term, medium term and short term).
- (iii) **Sector specific statutory reforms at advanced stages:** The TRAI in the Consultation Paper has stated that technology (and its constant evolution) is creating new convergence related challenges that the present disjunctive framework(s) is unable to deal with, and accordingly suggested convergence as a policy tool that may be adopted. However, please note that the Central Government is already at advanced stages of implementing sector

specific statutes to usher in principle based regulatory approaches, including in relation to new and emerging technologies. These sector specific reforms are being carried out in the following two ways, and, in our view, may more effectively address the regulation of these technologies: (i) First, various legislations concerning a sector are being coalesced into a single legislation (for example, the Telecommunications Bill proposes to replace the Indian Telegraph Act, 1885 and the Indian Wireless Telegraphy Act, 1933). In this respect, we also note that as mentioned in Annexure III of the Consultation Paper, whereby the Ministry of Information and Broadcasting (“MIB”) has through its letter to the Department of Telecommunications (“DoT”) advocated against a converged regulatory regime because it is inter alia planning to introduce large scale, all-encompassing reforms in the broadcasting sector in the near future; (ii) Second, the inadequacies in existing present legislative frameworks are being addressed, through the introduction of provisions to regulate new and emerging technologies (such as, communication technologies that are provided in the application layer are proposed to be regulated under the Telecommunications Bill).¹. Further, we understand that the Central Government is working on the introduction of a new Digital India Act (“DIA”). This DIA will likely replace the Information Technology Act, 2000 and focus on, among other things, openness, user safety, consumer trust and accountability in the digital ecosystem. We understand that the DIA will likely include provisions to regulate the IT and ITeS sector at large i.e., for instance, cloud service providers (“CSPs”), as well as new and emerging technologies (such as artificial intelligence-based platforms, metaverse, etc.).

Lastly, we believe that suggesting further new regulatory frameworks, at this stage, above and beyond what is being already proposed by the Central Government, would be a reversal of consultative meetings and efforts devoted and put in through engagement with stakeholders. Accordingly, any such action(s) to undo these previously suggested frameworks (or reforms to existing frameworks) should be avoided (to the extent possible).

- (iv) **Need for further details to be elaborated by the TRAI:** In our opinion, given TRAI’s position as a statutory regulatory authority, it would have specially aided this ongoing consultation process if the TRAI had provided detailed observations on inter alia the enforcement mechanism within a converged framework - and how certain challenges arising out of its suggestions (including having a unified regulatory authority) to pursue convergence (such as, at the administrative and practical level) may be most effectively dealt with. However, we note that the Consultation Paper only refers broad questions/comments which are principle-based (such as, on the need for a single comprehensive code and the setting up a unified regulatory authority, etc.), without fleshing out the implementational details relating to the same. In the absence of the same, we are

¹The TRAI in paragraph 2.43 of the Consultation Paper, has referred to a converged statute/framework that could cover within its ambit, new age technologies like OTT communication services. However, this may be redundant given the developments vis-à-vis the Telecommunications Bill.

unable to comment on whether a converged framework will be truly beneficial for the telecommunication and broadcasting ecosystem.

- (v) **Regulatory approaches in other jurisdictions are not consistent:** According to the views expressed by the TRAI in the Consultation Paper, we understand that the TRAI is suggesting India should move towards convergence of regulatory regime for broadcasting and telecommunication services. This, the TRAI believes will ensure alignment with international best practices. However, we respectfully submit that this view should be reconsidered since India is at variance to these other jurisdictions, having adopted digital technologies at break-neck pace as opposed to similarly situated countries. In fact, we note that India is, among other things, uniquely positioned in terms of socio-economic indicators, has the advantages of demographic dividend and is poised to becoming a global superpower. However, like any other country in a similar stage of its developmental process, there are domestic limitations in terms of scarcity of skilled human resources, lower institutional capacities, and fiscal/budgetary resources, that ought to be accounted for. Addressing the needs of convergence may likely have an added negative bearing on these scarce human resources, limited institutional capacities and may result in significant disruption and challenges for the entire country as a whole, as well as the telecommunications and broadcasting sectors in particular. Further, over-regulation of new and emerging technologies through converged regulator frameworks may hamper rapid innovation that the tech and digital industry has seen in the last decade. In context of the above, it may also be noted that there is neither consensus nor verifiable evidence that convergence of regulatory frameworks is the best and most effective policy option available to a country. We understand that even jurisdictions such as the European Union that have broadened the ambit of regulations to include OTT services have done so by way of a light touch approach.

Therefore, in our view, each country adopts a regulatory framework, which best suits its own domestic environment, and regulatory and policy objectives. In these terms, the fact that there may be some form of a global push towards convergence for resolving sector/industry specific challenges (arising from technology developments or otherwise) by itself does not warrant introducing a single converged codified legal framework/unified regulator in India. Instead, we believe that the focus of the Government should be primarily on exploring non-complex solutions that exist outside of converged regulatory frameworks to address challenges arising out of convergence of technologies.

Such simpler solutions could include, for example, (a) encouraging and facilitating regulators to deepen their understanding of convergence through meetings and capacity building workshops; and (b) establishing formal channels of seamless communication between telecommunications and broadcasting regulators/ministries to address convergence issues. These solutions, we believe, may help in facilitating the healthy and orderly growth of the telecommunications and broadcasting sector through responsive and effective regulatory frameworks.

- (vi) **Regulatory convergence is incompatible with the functioning of specialized regulators:** We believe that domestic regulators that carry out specialised functions, such as the Competition Commission of India (“CCI”) cannot be easily subsumed under a converged framework regulators due to the very nature of the specialised functions that they perform in our economy. In the case of CCI, for example, it is well noted that the CCI has, in fact, run into jurisdictional conflict with the TRAI and which has required the intervention of the Supreme Court (“SC”) in the past.² In this respect, the SC in its judgment had commented on the need to ensure that sectoral regulators are able to effectively carry out their mandated functions in their niche domains. Thus, in our opinion, creating a converged regulatory regime for broadcasting is likely to lead to significant jurisdictional conflicts (due to overlaps in functions) between the proposed unified regulator and existing specialized regulators. These overlaps, as such, may lead to unwarranted volatility in the ecosystem and may also likely have to be effectively heard, and adjudicated by constitutional courts (on account of disputes or challenges). Moreover, a converged regulatory authority, in the Indian context, may likely require coordination between sub-departments/sub-bureaus created thereunder, with each having defined objectives and functions set out to regulate nuanced subject-matters in specific legal domains (for example, to regulate IPR issues). In this framework, we believe that it may likely be a significant (and for the most part, irreconcilable) challenge to even harmonize the functioning of sub-departments/bureaus which come within the ambit of a single unified regulator and avoid intra-jurisdictional conflicts.
- (vii) **Challenge of aligning regulations with technology:** We note that regulators across jurisdictions are often seen to be constantly trying to evolve policy frameworks to regulate new and emerging technologies and challenges thereof. That said, we believe that we should be equally cognisant of the prolonged policy cycle that a new set of rules/regulations brings in i.e., for its adoption and implementation etc. In this respect, as the TRAI in the Consultation Paper, notes if the intention is to make existing business processes more efficient, smoothen the rough edges (if any) and avoid legal uncertainties (to the extent possible), the concerted focus of domestic regulators should be on revising existing legislative frameworks, rather than proposing disruptive large scale reform processes such as unified/converged regulations.
- (viii) **Need for technology-based regulation for a competitive market:** In our view, efforts for regulation of converged technologies from the perspective of services or use-cases being offered may most likely have a detrimental effects on the ability of consumers to access new and emerging technologies (and their use-bases), and also generally, impede

² *Competition Commission of India v. Bharti Airtel Limited and Ors.*, Civil Appeal No(s). 11843 of 2018 & Ors. The Supreme Court noted as follows “*the conclusion of the aforesaid discussion is to give primacy to the respective objections of the two regulators under the two Acts. At the same time, since the matter pertains to the telecom sector which is specifically regulated by the TRAI Act, balance is maintained by permitting TRAI in the first instance to deal with and decide the jurisdictional aspects which can be more competently handled by it.*”

innovation, commercial growth and competition in the market. In this respect, we believe that the approach to regulation should depend on the technology being deployed and not the services offered. Such an approach (unlike a converged regulatory framework), in our opinion, would provide an enabling environment for consumers and industry alike to harness the benefits of these new and emerging technologies and digital services offered. In light of all the reasons set out above, it is our considered view that the sector specific reforms initiated by the Central Government (and as highlighted above) adequately deal with convergence issues (to the extent required). We believe that having separate, though complementary, legislations in each sector could potentially help us focus more clearly on specific aspects of each regulatory or policy issue which a converged legislation may not achieve. Thus, the convergence of regulatory frameworks concerning the carriage of telecommunication and broadcasting services is not required to be undertaken.

Q2. Whether the present regime of separate licenses and distinct administrative establishments under different ministries for processing and taking decisions on licensing issues, are able to adequately handle convergence of carriage of broadcasting services and telecommunication services? If yes, please explain how?

If no, what should be the suggested alternative licensing and administrative framework/architecture/establishment that facilitates the orderly growth of telecom and broadcasting sectors while handling challenges being posed by convergence? Please provide details.

Response:

We believe that there is no need to overhaul the present regime in the broadcasting and telecom sector of separate licenses and distinct administrative establishments under different ministries for processing and taking decisions on licensing issues. We acknowledge the TRAI's twin objectives of pursuing an orderly growth of the industry, as well as responding to challenges posed by the convergence of carriage of broadcasting and telecommunication services. However, we strongly believe that the same can be addressed by existing regulatory systems. Separately, we note that various issues identified in the Consultation Paper relate to the slow process of granting licences/permissions/registration to concerned stakeholders – thus creating added bottle necks and inefficiencies. In order to remedy this, the primary aim of the Government should be to improve the ease of doing business in the existing licensing and administrative framework – as opposed to completely overhauling this framework and introducing a converged regime. To elaborate:

- (i) The DoT and MIB, (in respect of particularly, telecommunications and broadcasting), have, among other things, the requisite sectoral knowledge base and expertise for creating effective regulatory mechanisms (and fine tune them) for current and upcoming market actors. In any event, the Telecommunications Bill already seeks to

consolidated specific aspects related to telecom (such as, those related to right of way and spectrum allocation). The ability of the DoT and MIB to exercise oversight in regard to telecommunications and broadcasting respectively should not be curtailed.

- (ii) In context of the above, please note, a converged regime for issuing licenses, providing permissions and authorisations (much like, a converged regulator) as such, may only bring together these licenses, permissions etc., under a single structure – without necessarily leading to any material positive impacts. Such desired efficiency is likely to be achieved only through: (a) proactive action and collaborative decision making between ministries and with stakeholders, (b) clarity and consistency in the rules and regulations (and their application), and (c) providing businesses with the required support to operate in a free and enabling environment. In view of the reasons set out in the foregoing paragraphs, please see below our recommendation (as an alternative to convergence and for introducing system wide seamless efficiency) which would likely facilitate sector-wise regulators to operate within their respective domains and, in making existing business processes more efficient. This, we believe, would result in providing much needed stimulus to industry and consumers (as opposed to convergence, which would create uncertainty and disruption).
- a. The need for NSWS to have wider coverage and be more robust: We note from news reports that the National Single Window System (“NSWS”), which is an integrated digital platform serving as a single window clearance system for approvals and licenses, will likely integrate all Central Government departments by the end of 2023. We further understand that some of the telecommunication and broadcasting related approvals are already now required to be obtained through the NSWS channel. Specifically, for making the NSWS channel more effective, we propose: (i) all license approvals be mandatory obtained through the NSWS channel (including those that are presently being applied for through the Broadcast Seva portal and the Gatishakti Sanchar portal); and (ii) implementing strict timelines for the relevant ministry/department to process the license applications (to be monitored by an official not lower than the rank of Joint Secretary to the Government of India). Further, to address concerns which arise while processing such applications, such as the lack of adherence to the strict timelines, or in relation to any other pending licensing issues – we propose the creation of an independent nodal body or official agency, having representatives with subject matter expertise. This body/agency could primarily serve to steer inter-ministerial coordination for all licensing and allied issues. In addition, a governmental policy should be implemented requiring government departments to mandatorily engage with stakeholders on a consistent basis on issues relating to licenses and approvals.

Q3. How various institutional establishment dealing with –

(a) Standardization, testing and certification.

(b) Training and Skilling.

(c) Research & Development; and

(d) Promotion of industries

under different ministries can be synergized effectively to serve in the converged era. Please provide institution wise details along with justification.

Response:

In our considered view, the workings of the various institutional establishments can be additionally and effectively synergized. We have elaborated below on how such synergies may be achieved below:

Standardization, testing and certification.

- (i) It is true (as noted by the TRAI in the Consultation Paper) that one of the more important challenges created for converged technologies is also that under the existing regulatory regime, a converged technology has to adhere to multiple (and most often) overlapping standards. These standards, for instance, for telecom and related IT equipment, are issued by several agencies (such as the BIS and TEC) within several ministries. This multiplicity of standards (which are, often, overlapping in nature), in our view, produces less than desirable outcomes especially for innovation in the Indian economy.
- (ii) However, instead of converging such standards, testing and certification under one authority, the most appropriate policy response is for the core competencies of each authorized agency be utilised effectively and overlaps between different agencies vis-à-vis their standards and functions be reduced. In respect of the same, it is our additional suggestion that the agency proposing to introduce new standards should be first mandated to engage with relevant stakeholders and assess whether the industry-wide practices can be adopted. The importance of this stems from the perspective of ensuring that standards which are developed are based on: (a) a more thorough understanding the technical nuances of the underlying technology; (b) keeping the interest of users at the forefront (including risks, harms and benefits); and (c) the most effective method for facilitating service delivery.

Training and Skilling.

- (i) At the outset, there is an existing knowledge base within the government (for example, the Union Ministry of Skill-Development and Entrepreneurship had commissioned and published the following reports: ‘Human Resources and Skill Requirements in the

Telecommunications Sector’ and ‘Human Resources and Skill Requirements in the Media and Entertainment Sector’).

- (ii) This existing knowledge base informs us of the urgent need of ensuring upskilling and reinforcing existing skills of the workforce in India in line with technology developments. The two reports also suggest that these requirements can be achieved in the following ways: first, through public-private partnership models in training for infrastructure sharing; and second, by way of usage of modern technology in training methods and curriculum. The implementation of these suggestions, in our view, would aid the functioning of and synergy between different training and skilling institutions, including those housed within the DoT and MIB respectively.

Research & Development

- (i) In our view, the most significant step for synergizing research and development activities in India, is by facilitating research institutions to produce ground-breaking technical research. This, we suggest should be undertaken through the further adoption of public-private partnership models. The net positive impact of the implementation of such a suggestion is that it will make available to such institutions and their researchers adequate financial resources, as well as allow them with access to necessary infrastructure to do meticulous research, undertake testing, certification and marketing of their in-house converged technologies. Additionally, it may also help facilitate domestically grown digital services to reach scale at a fast pace.

Promotion of industries

- (i) The Consultation Paper outlines the various government led schemes and initiatives for promoting industries (such as, cohort-based Accelerator programmes initiated by Ministry of Electronics and Information Technology), which have made significant contributions to the penetration of digital technologies. To further synergize the implementation of such schemes and initiatives for system wide benefits – We recommend, the creation of a cohort/ opt-in based regulatory sandbox coordinated jointly by the MIB and the DoT and other relevant ministries/department to encourage innovation and growth in new and emerging technologies (such as, for artificial intelligence-based platforms, virtual reality, and augmented reality).
- (ii) Please note, our recommendation here, is line with global trends (for example, under the Vision 2030 in Saudi Arabia, the Communication, Space and Technology Commission of Saudi Arabia has initiated a regulatory sandbox for new and emerging technologies), as well as domestic initiatives, such as the regulatory sandbox launched by the Reserve Bank for the financial technology sector. Much like regulatory sandboxes introduced for specific sectors and in different countries, our recommendation would likely facilitate: (i) regulators to obtain first-hand empirical evidence on emerging technologies and weigh the risks, benefits and implications for developing a more effective regulatory toolkit; (ii) participants to achieve greater integration of such new technologies with their business

operations (through thorough understanding of the technology at play); and (iii) increase the speed which innovation is happening, as well as the adoption/penetration of technology by consumers and industry players alike.

Q4. What steps are required to be taken for establishing a unified policy framework and spectrum management regime for the carriage of broadcasting services and telecommunication services? Kindly provide details with justification.

Response:

In our opinion, a unified policy framework and spectrum management regime for the carriage of broadcasting services and telecommunication services would be inimical to efficiency in government led business processes for, among other things, allocation of spectrum bands. This is primarily because of the speed with which technology evolves, but also due to the growing demands of the broadcasting and telecommunication sector (for instance, telecom service providers have been requesting the DoT for 6 GHz bands for a cost-effective rollout of 5G in the country). Therefore, in the interest of ensuring that the concerned regulatory authority responds adequately and effectively to developments in technology as well as to industry demands, the country should adopt the approach of examining such related issues on a case-to-case basis, instead of by way of a top-down approach vis-a-vis a uniform policy framework and spectrum management regime.

In context of the above, notably, the Telecommunications Bill seeks to authorise the Central Government to administratively assign spectrum for telecommunication, and also provide exemptions to specific usages within specified frequencies and parameters from requirements mentioned under the draft law (in public interest and by notification). In this same spirit of promoting innovation in the ecosystem and encouraging deeper technological adoption and penetration, we believe that light-touch regulation(s) should be introduced for certain less valuable spectrum bands (and wherever possible, delicensing). This may, among other things, enable entities which typically do not have access to large capital to participate in spectrum auction for these bands.

Q5. Beyond restructuring of legal, licensing, and regulatory frameworks of carriage of broadcasting services and telecommunication services, whether other issues also need to be addressed for reaping the benefits of convergence holistically? What other issues would need addressing? Please provide full details with suggested changes, if any.

Response:

We note that the TRAI in the Consultation Paper has analysed various other issues outside the scope of the terms of reference issued by the DoT, which the TRAI believes needs to be addressed for reaping the benefits of convergence holistically. In particular, the ITeS sector

(for instance, CSPs) has been highlighted by the TRAI as an industry where the growth of converged technologies is significant, and therefore, regulatory frameworks for the same may need to be re-examined. However, in our opinion, and from the perspective of this Consultation Paper, such a requirement does not arise considering the fact that the DIA is likely to include data regulations norms for data storage (among other things) and, also establish a new regulatory authority akin to the TRAI for enforcement and implementation of penalty provisions. To the extent there is a need to further update the draft legislation to cover issues that may have been missed, - we believe the public consultations would be sufficient in terms of bringing them to the attention of the Central Government for prompt redressal.

Should you have any questions or need clarification on any of the recommendations, please do not hesitate to contact us directly at Secretariat@aicasia.org or +65 8739 1490. Importantly, we also look forward to offering our inputs and insights, directly through meetings and discussions with TRAI and concerned stakeholders.

Thank you for your time and consideration.

Sincerely,



Jeff Paine
Managing Director
Asia Internet Coalition (AIC)
