

## **BIF Counter Comments to TRAI Consultation Paper on Digital Inclusion in the Era of Emerging Technologies**

### **(A) Utilization of USOF Fund (Now Bharat Digital Nidhi as per Telecom Act 2023) and Bharatnet Fiber**

Some of the stakeholders have argued for abolishing the USOF and utilization of Bharatnet infrastructure for rural areas only.

#### **BIF Response:**

1. At the outset, we submit that the Recommendations of TRAI should be aligned to the new Telecommunications Act 2023 that has provided for constitution of Bharat Digital Nidhi with the following objectives:
  - a. support universal service through promoting access to and delivery of telecommunication services in underserved rural, remote and urban areas;
  - b. support research and development of telecommunication services, technologies, and products;
  - c. support pilot projects, consultancy assistance and advisory support towards provision of service under clause (a) of this section;
  - d. support introduction of telecommunication services, technologies, and products.
2. Thus, with new avatar of Bharat Digital Nidhi (BDN) it is apparently clear that the USOF has been upgraded and enlarged into this new organization which has been termed as Bharat Digital Nidhi. The objectives of Bharat Digital Nidhi are worth lauding noting the fact that the fund is to be used for connecting the unconnected and underserved, and noting that it would be also used for development of telecommunication services, apart from using the same for R&D, innovation, introduction to new technologies, and supporting pilot projects etc. We appreciate the objectives and enhanced scope of Bharat Digital Nidhi.
3. In view of the revised objectives and scope of Bharat Digital Nidhi as mentioned in Telecom Act 2023, we recommend that the amount of contribution to Bharat Digital Nidhi may be reviewed.
4. We also recommend use of BDN funds for underserved areas in urban localities and not limiting its use only for rural areas as requested by one of the stake holder.
5. BIF does not endorse the views expressed by some of the stakeholders for Zero LF for Satcom as it will lead to very low entry barriers and non-serious players may enter in this market which would be detrimental to the growth of telecom sector. However, we agree with some stakeholder views regarding

pricing of administrative assignment of Satellite Spectrum should be reduced and kept minimal.

6. BIF's view is in consonance with the TRAI recommendations of 2021 for 'Promotion of Broadband' wherein it recommended deployment of funds to support DBT (Direct benefit Transfer) to cover cost of broadband access including Cost of FWA terminals /VSAT Terminals) in Rural Areas.

**(B) Digital Connectivity:**

7. Utilization of Satcom for underserved and unserved areas particularly in inaccessible areas of J&K and NE and forest areas of the country and the islands of A & N should be done extensively. We echo views of World Bank on use of Satcom for digital connectivity and recommend need to open up the market for both indigenous and foreign players to compete on equal footing, thereby making Satcom Prices affordable.

In summary, there is currently need to adopt mission mode for digital connectivity, affordability, literacy and Digital Inclusion.

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