

## Sensorise Comments on TRAI Consultation Paper Ease of Doing Telecom Business in India

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[Promoting “ease of doing business” is amongst the priority work items for unhindered growth of the telecom sector. A number of steps have already been taken for ease of doing business. Steps like adoption of market based spectrum management such as assignment of spectrum through auction, permitting spectrum trading, spectrum sharing and liberalisation of administratively assigned spectrum, Unified Licensing regime, Merger and Acquisition guidelines, Virtual Network Operation etc.] have been guided by the principles of “ease of doing business”.

Sensorise: Our gratitude and complements to the Authority for bringing out the Consultation Paper. It is critical to simplify telecom services to usher in the next wave of growth

### 1. Context of the Sensorise Comments

- Communication networks are already the lifeline of our country
- Data Usage has proliferated massively, and continues to grow exponentially
- Machine connectivity is the next frontier
- Applications that connect ‘things’ are ushering in the next industrial revolution
- The Indian economy has grown leaps and bounds that last 20 years on the back of “technical brain drain” that sent back huge amounts of inward remittances. Rich and developed countries are rapidly closing their doors to foreign talent, India is likely to take a significant hit
- India must take a very significant share of the coming IoT / M2M boom, if it has to keep the momentum in the tech sector. To do this, it must make it very easy, and very inexpensive, for technical talent to innovate and serve the local and international markets

[Further, the Authority is of the opinion that various processes that a telecom licensee is required to .....:

- Related to Unified Licence
- ....
- Merger and Acquisition Policy]

### 2. Ease of doing business - technical

- Expand the IT Act to allow very inexpensive wireless certificates for all types of gateways and modules
- Allow IoT / M2M Application developers to embed connectivity within their solution suites with just a simple registration and reporting to DoT, without requiring any licenses

- Allow Indian M2M / IoT Companies to source and embed international subscriptions in their Products and Solutions, making the solutions ready 'out-of-the-box' for the international markets
- Allow Data Only mobile connectivity that uses an embedded SIM, DES secured messaging and APN secured connectivity to follow much simpler KYC norms. An M2M Device registry, maintained by the TSP or M2M Service Provider should be sufficient
- Z-Wave as a Private Area Network Technology has done well, especially in Europe. India has a unique frequency allocated to Z-wave within the ISM band. Business can expand for Indian Sensor and Device OEMs if India allows Z-Wave to operate in either of EU or IN frequency

[In addition, there can be processes in other areas which may be requiring simplification. In view of the above, the stakeholders are requested to identify such areas of concern and review the existing processes and suggest mechanisms that ease the business activity.]

### **3. Ease of doing business - commercial**

- The Preferred Market Access Notifications should be expanded to include M2M and IoT Products and Solutions
- Smart Cities Projects should set aside at least 10% of the Business for Start-ups, giving them a chance to prove their worth
- GSMA Registration and Certification is very expensive for Indian Startups. A government agency such as Telecom Engineering Centre should offer corresponding Certification services making it easy and inexpensive for Indian Companies to get the required certification
- FBG, PBG, Registration and License Fees for Startups with an Indian Patent should be waived off