**Question 1: Is it too early to establish a regulatory framework for Internet/OTT services, since internet penetration is still evolving, access speeds are generally low and there is limited coverage of high-speed broadband in the country? Or, should some beginning be made now with a regulatory framework that could be adapted to changes in the future? Please comment with justifications.**

Answer: Yes. Internet connectivity in India is still to evolve and it will do more harm than good to it if a regulatory framework is established for OTT services as it defines the internet for most people.

**Question 2: Should the Internet/OTT players offering communication services (voice, messaging and video call services through applications (resident either in the country or outside) be brought under the licensing regime? Please comment with justifications.**

Answer: No. They should not be brought under the licensing regime as it will immensely affect the citizens’ freedom to use OTT services.

**Question 3: Is the growth of Internet/OTT impacting the traditional revenue stream of Telecom operators/Telecom operators? If so, is the increase in data revenues of the Telecom Operators sufficient to compensate for this impact? Please comment with reasons.**

Answer: Internet connectivity and internet speed is not yet fully fledged all around India, so it can’t affect the revenues of telecom operators in such a way that the increasing data revenues can’t balance. For every User who bails out on SMS packs, gets a data pack which is at least thrice more costlier.

**Question 4: Should the Internet/OTT players pay for use of the Telecom Operators network over and above data charges paid by consumers? If yes, what pricing options can be adopted? Could such options include prices based on bandwidth consumption? Can prices be used as a means of product/service differentiation? Please comment with justifications.**

Answer: If the OTT players are charged, then it’ll be harder for them to provide their services for free to the customers. The customers are already paying the Telecom operators for accessing data services, so the OTT players should not or else the customers will end up paying much more.

**Question 5: Do you agree that imbalances exist in the regulatory environment in the operation of Internet/OTT players? If so, what should be the framework to address these issues? How can the prevailing laws and regulations be applied to Internet/OTT players (who operate in the virtual world) and compliance enforced? What could be the impact on the economy? Please comment with justifications.**

Answer: Yes it does and that is what keeps the Operators in check from being partial to OTT service providers. But I don’t think there would be any impact on the economy as the more users start using OTT services, the more will be the data revenues of the operators making it balanced. Not all the regulations should be enforced to OTT players.

**Question 6: How should the security concerns be addressed with regard to Internet/OTT players providing communication services? What security conditions such as maintaining data records, logs etc. need to be mandated for such Internet/OTT players? And, how can compliance with these conditions be ensured if the applications of such Internet/OTT players reside outside the country? Please comment with justifications.**

Answer: The Government should only be concerned with what information the OTT players are demanding from the users and should make the OTT players enforce a system that could detect any security threat possessed by any customer.

**Question 7: How should the Internet/OTT players offering app services ensure security, safety and privacy of the consumer? How should they ensure protection of consumer interest? Please comment with justifications**

Answer: They should protect the customer’s interest and should respect customer’s privacy. The customers should know about everything that is being shared with the OTT players as well as the public. The OTT players should maintain transparency with the users and the Government on the basis of what they are demanding from the user.

**Question 8: In what manner can the proposals for a regulatory framework for OTTs in India draw from those of ETNO, referred to in para or the best practices? And, what practices should be proscribed by regulatory fiat? Please comment with justifications.**

Answer: Network operators and “OTT” players provide different services and are not competitors. The same way power distribution companies and air conditioner manufacturers are not competitors. Profits or Network Operators and “OTT” players are not mutually exclusive. There is no need to “level the playing field” here, instead we should look at how to make sure both industries grow and continue succeeding. I see no substantial reason why there is a need to draw anything related to the question of “OTT players” and net neutrality from the ETNO based on that paper.

**Question 9: What are your views on net-neutrality in the Indian context? How should the various principles be dealt with? Please comment with justifications.**

Answer: Most people in India especially in rural areas are still internet deprived. Everyone is improvising and net neutrality is one of the major factor behind it. If net neutrality is removed, it’ll snatch both power and benefits of the customers. ISPs are not providing internet for free, so why should they dictate then. For India to be digitised, net neutrality is very important. Quoting Mr. Ravi Shankar Prasad ‘Internet highway should be opened for all. It should not be controlled by a few’.

**Question 10: What forms of discrimination or traffic management practices are reasonable and consistent with a pragmatic approach? What should or can be permitted? Please comment with justifications.**

Answer: Apart from emergency scenarios (like DDOS attacks or other network strain related issues), there should not be any discrimination based on either price or non-price models. Cause in no way is discrimination a fair approach for traffic management.

**Question 11: Should the Telecom Operators be mandated to publish various traffic management techniques used for different OTT applications? Is this a sufficient condition to ensure transparency and a fair regulatory regime?**

Answer: Any case by case traffic management of OTT applications, even if it is transparent, violates Net Neutrality. So, this question won’t arise if TRAI ensures Network Neutrality.

**Question 12: How should the conducive and balanced environment be created such that Telecom Operators are able to invest in network infrastructure and CAPs are able to innovate and grow? Who should bear the network upgradation costs? Please comment with justifications.**

Answer: To give an analogy, if the electric grid system needs an upgrade, the entity in charge of the grid is responsible for it and bears the charge for the upgrade. They do not ask for TV companies, Fan companies, AC companies and others which run on top of this electric grid network, to bear that cost. They can increase the charge to the end-user if they see fit, and the end-user is free to pay the increased cost and continue to get electricity, or to disconnect the connection. This is exactly what needs to be done with internet.

**Question 13: Should Telecom Operators be allowed to implement non-price based discrimination of services? If so, under what circumstances are such practices acceptable? What restrictions, if any, need to be placed so that such measures are not abused? What measures should be adopted to ensure transparency to consumers? Please comment with justifications.**

Answer: Again, this violates the principles of Net Neutrality, so no, TSPs should not be allowed to implement non-price based discrimination of services.

**Question 14: Is there a justification for allowing differential pricing for data access and OTT communication services? If so, what changes need to be brought about in the present tariff and regulatory framework for telecommunication services in the country? Please comment with justifications.**

Answer: Obviously not. Anything that violates the principles of net neutrality and acts more in favour of the TSPs rather than the Citizens are not justified in any case.

**Question 15: Should OTT communication service players be treated as Bulk User of Telecom Services (BuTS)? How should the framework be structured to prevent any discrimination and protect stakeholder interest? Please comment with justification.**

Answer: ALL data on the Internet is EQUAL. ALL bits are bits, NO need to segregate OTT players. TSPs need to focus on improving their existing products and quality of service.

**Question 16: What framework should be adopted to encourage India specific OTT apps? Please comment with justifications.**

Answer: India is a big market, especially for communication services, and most big OTT Players can assure you that they are paying attention to India as a market even without any proposed regulation. As far as Indian companies doing OTT communication apps, they should compete with everyone else without any hand-holding or help from regulation, in order to innovate and make the best possible service.

**Question 17: If the App based/OTT communication service players are to be licensed, should they be categorised as ASP or CSP? If so, what should be the framework? Please comment with justifications.**

Answer: NO regulatory framework required. NO segregation of OTT players required. NO traffic discrimination required. ALL bits are bits. DON’T hamper industry growth. Uphold Net Neutrality.

**Question 18: Is there a need to regulate subscription charges for App based/OTT communication services? Please comment with justifications.**

Answer: This will directly affect the digitisation of India as a whole. So there is no need to regulate subscription charges for App based/ OTT communication services. TSPs can earn much more profits if the start providing better internet services rather than just thinking of how to break net neutrality.

**Question 19: What steps should be taken by the Government for regulation of non-communication App based/OTT players? Please comment with justifications.**

Answer: No regulation is necessary of such OTT Players. The internet, and the OTTs running on it, are already innovating, competing, and succeeding well.

**Question 20: Are there any other issues that have a bearing on the subject discussed?**

Answer: Protect Net neutrality. It is the key to forming a better and connected India. Don’t hamper with the development of the country just to promote TSPs’ dictatorship.