Comments on Consultation Paper on Definition of International Traffic dated 2nd May 2023

From : hari nath <hari_nath@zohomail.in>   Sat, May 06, 2023 10:36 AM

Subject : Comments on Consultation Paper on Definition of
International Traffic dated 2nd May 2023

To : Akhilesh Kumar Trivedi <advmn@trai.gov.in>

Respected sir,

I am quiet thrilled that TRAI is asking for comments and counter comments on international traffic as per URL https://www.trai.gov.in/consultation-paper-definition-international-traffic As mentioned in the paper itself "India is currently the world's second-largest telecommunications market." and as a current citizen of India. I see myself as a stakeholder.

Discussing the relevant issues for paper in URL
https://www.trai.gov.in/sites/default/files/CP_02052023.pdf

Q3 : Since the terms 'Inter circle traffic' and 'Intra circle traffic' are already defined in the telecommunication service license agreements, whether there is still a need to define the term 'domestic traffic' ….

Response: TRAI/Government of India has an obligation to protect the data of Indian citizens. In continuing with this theme these terms would be needed to enhance privacy of citizens while keeping in mind the security needs of the country.
Things like pay phones/public call booths becoming practically non existent does not mean these terms would be outdated. There are uses to these terms beyond the billing system of telecom operators, like in balancing privacy with security.

Q2: define the term 'international traffic'
The definition has not taken into account network heterogeneity. It seems to only consider connection oriented networks. Also the raise of automated communication system does not seem to be taken into account.
Machine generated international traffic and Human generated international traffic needs to be classified differently to try and protect Indian citizens, sooner or later. There also seems to be no talk about international transit data, which can only contain parts of a data stream. If routing of such data wisely is the telecom operators responsibility (they claim they hire only educated and talented people) , India can treat such traffic as public property used to benefit Indian citizens.
Taking these issues to account, it would not be possible to define 'international traffic' anymore as it would need more sub definitions and this would be a mere meta definition.

Thanking you,
Hari