ADDITIONAL RECOMMENDATIONS ON CLOUD COMPUTING SERVICES

1. In a diversified and intricate demands of cloud computing a clear mandate to form an apex body over CSP's is a need of the hour for a practical and prudent decision to form a single body of representation to meet the need. Multiple bodies will led to conflict of ideologies and a state of stalemate and impasse. Norms set by an apex body will be automatically applicable to bodies down the line – unless otherwise exempted. DoT will act as the apex body and TRAI will be the governing body.

   The nature of CSP's activities and volume, customized capping should be applicable inline with the demand skew. Uncapped registrations will definitely led to a defocussed forum with lowered efficiency.

   Industry bodies by the virtue of their trade licenses has been categorised. TL may be a foundation to register. CPS's with multiple registered bodies will led to an ambiguity as experienced earlier in WLL telephony service providers.

2. The entry barrier should be simple and attainable. Few of the main documents can be (a) Trade License (b) PAN card & Tax returns (non defaulter) (c) Balance Sheet and PL (d) Green certificates (e) defining the necessity for the registration (f) Contribution the yearly restoration of nature. GST registration and filing details will add more depth.

3. The threshold point at the beginning be kept low. Volume of business do have a direct impact to the usage of cloud infrastructure, data centre location, DR (FDR & NDR), bandwidth redundancy, single points of failure, seismic zones and not the least the eco-friendliness, social commitments & ethics should define the measuring standards and the potentiality of the CSP's. Mere business and need to cloud computing in the parlance of cloud scape cannot be the considered as a prima facie to get registered.

4. Entry norms be kept uniform, entry fees should be low for registered TRAI members and SME's (hoping to grow up in no time). Entry fees should be higher for MNC's. Recurring cost should be based on categories of service provide (CaaS, PaaS, IaaS, RaaS…). DoE can frame a similar schema taking inputs from DTH (SD, HD, FHD, 4K…) as recommended by TRAI in the recent past.

5. Herein DoT can take the model of Planning Commission Of India (PCoI) protocol of functioning. DoT representatives will meet the industry representatives and CSP's in a common forum and organise a cross platform high level of discussion and understand the new need and gaps in between. Post session expert panel of DoT will critically moderate and analyse the data and decide on future course of actions, modifications, conflict resolution and draw a line of action to give the CSP's a modus operandi and a review of the TRAI guidelines framed earlier.

6. NASSCOM has a registered ICT companies by-and-large including CSP's. To start with, existing list can be taken as a basis and non registered CSP can be registered laterally. Registration of MNC's should be given temporary enlistment for a maximum of three years (or lower). MNC's should confirm to Indian norms.

7. Points of Relevance
   - NDC should prima facie act as an facilitator to CSP's and have to come up with a flexible CoC available at public domain.
   - NDC will publish credibility list in public domain in a quarterly basis to encourage healthy competition among the CSP's (detail criteria of measuring will be taken up on acceptance of this note).
   - NDC will act as a consultant to end user customers to migrate to cloud architecture at marginal fees.
   - NDC will monitor unwanted nexus among the CSP's as well as representatives of NDC.
   - As we see a tumultuous need for computation infrastructure with the inception of Virtual Reality (VR), BI, Robo as a service (RaaS) and many many more to come, it has now become a mandate to redefine a new guideline from DoT vis-a-vis TRAI.