TTL response to Consultation Paper on
"Cloud Services"

Question 1:

Whether there should be single industry body or multiple industry bodies of cloud service providers which may be registered with DoT? If multiple industry bodies, whether there should be any cap on their number? Should the industry bodies be registered based on the category or type of CSPs? Can a CSP be a member of multiple industry bodies? Please suggest with justification.

TTL Response:

Single industry body of CSP to avoid confusion and multiple / conflicting agendas.

Question 2:

What should be the eligibility criteria for an Industry body of CSPs to register with DoT? What is the list of documents that should be required to be submitted as proof of eligibility? What obligations should be cast upon the Industry Bod(y)(ies) after registration with DoT? Please suggest with justification.

TTL Response:

Besides being a CSP, there shouldn't be any other eligibility criteria. Obligations in terms of adhering to data privacy, security and transparency should be defined to ensure that members adhere to the same. Obligations for the Industry body after registration is to clear operating principles, share information, discuss issues, develop standards and establish rules for best practice within industry.

Question 3:

What may be the threshold value of parameters such as the volume of business, revenue, number of customers etc. or combination of these for a CSP to mandatorily become member of a registered Industry body? Please suggest with justification.

TTL Response:

CSPs include both large and small players in the current context. There definitely should be a membership criteria. It could be Revenue based e.g. Revenue >10 Lakh PA.
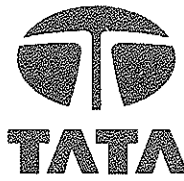
Question 4:

Whether entry fee, recurring fee etc., need to be uniform for all members or these may be on the basis of type or category of members? How such type or category can be defined? Should such fee be prescribed by DoT or be left to be decided by the Industry body? Please suggest with justification.

TTL Response:

Fees should be decided by industry body and not DoT.

Question 5:

What should be the guiding principles for governance by an industry body? How would these principles/organisation structure ensure fair, reasonable and non-discriminatory functioning of body? Should structure of Governance be prescribed by DoT or should it left for the industry body to decide? How can the industry body achieve the desired deliverables efficiently and effectively? Please suggest with justification.

TTL Response:

Structure of Governance be should be left for the industry body to decide in consultation with its members. Governance should clearly define expectations in terms of adhering to customer privacy, data security.

Question 6:

What policy may be adopted for initial formation of industry body for cloud services? Please suggest with justification.

TTL Response:

CSPs should be asked to jointly formulate the policy related to formation of the Industry body for Cloud Services in India.

Question 7:

Any other issue which is relevant to this subject? Please suggest with justification.

TTL Response:

N.A.