To,
Mr. Asit Kadayan
Advisor (QoS)
Telecom Regulatory Authority of India (TRAI),
Mahanagar Door Sanchar Bhawan

Respected Sir,

We are reaching out to your esteemed office, on behalf of **VMware Software India Pvt. Ltd.** to submit comments on the <u>Consultation Paper on Cloud Services</u>. VMware India is a cloud-computing and networking solutions firm. VMWare is keen to be an active stakeholder in the development of the regulatory ecosystem of cloud services in India and applauds the government's efforts in opening up discussions and consultations to form a holistic policy on the same.

Please find the comments below from VMware's end:

1. VMware shall be classified as PaaS infrastructure provider (Refer page 4).
2. The paper's overall focus/coverage on functional and non-functional aspects of the cloud (for governance needs) is good enough to start with. VMware would be highly interested in being part of the industry representatives forum for the future consultation meetings to collaborate with the government experts on the framework of cloud services and narrowing down the metrics for grading critical regulatory decisions.
3. VMware at present is a member of Cloud Computing Innovation Council of India and would be keen to be part of an industry association that enables growth of the cloud computing sector, and industry which is keen on developing innovative systems through cloud platforms.
4. While, the paper looks at a robust structure for cloud services, VMware suggests that there has to be a stringent approach to prevent *over-regulation* so that Ease-of-Doing-Business in India as well as innovation and development are not hampered.
5. For the purported areas mentioned – data security, portability, interoperability; market driven solutions are a better answer than any regulation. In fact, for active players in the industry, having regulatory bodies taking on this task is counter-productive to opportunities that can arise in the market place. In particular, it can be detrimental to the entire cloud Industry's interests. This is a fledgling growth area and it doesn't warrant regulation, particularly, from a marketplace standpoint.

Hope these comments help TRAI in framing their recommendations for the Ministry. We shall look forward to the consultation by TRAI on framing the ecosystem of cloud services in India.

Should there be any concern, please do not hesitate to reach out to us.

Sincerely,
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