

Ref No: RP/FY 17-18/062/414
Dated: 27th November, 2017.

To,
Shri Arvind Kumar,
Advisor (BB&PA),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi - 110 002.

Subject: Response to Consultation Paper on "Promoting Local Telecom Equipment Manufacturing"

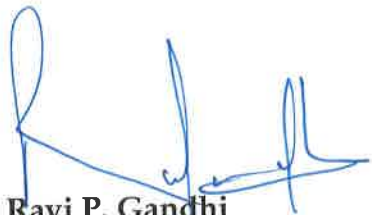
Reference: TRAI Consultation paper dated 18th September, 2017.

Dear Sir,

This is with reference to your above mentioned consultation paper. In this regard, please find enclosed our response for your kind consideration

Thanking you,

Yours Sincerely,
For **Bharti Airtel Limited.**



Ravi P. Gandhi
Chief Regulatory Officer

Enclosed: As mentioned above

Bharti Airtel Limited's Response to TRAI's Consultation Paper on 'Promoting Local Telecom Equipment Manufacturing'

We completely agree with the importance of Domestic manufacturing and are committed to support it, in the interest of the country and for the benefit of Indian Telecom sector and consumers. We submit that the creation of supporting ecosystem and an incentive based approach can yield the desired results in the field of domestic manufacturing of telecom equipment. Government may carve out a long term plan (for example a 10 year plan) to make domestic manufacturing competitive in terms of quality, technology and cost.

Issues for Consultation:

Q.9 Does the existing PMA policy require any change? If yes, then please provide complete details with justifications.

&

Q.10 Any other relevant issues that needs to be addressed to encourage local telecom manufacturing in our country.

Bharti Airtel's Response:

Telecom sector is one of the pioneering sectors in India which has been keeping up pace with the world as far as deployment of latest technology and innovative service offering is concerned. Indian consumers today have access to the advanced technologies like 3G and 4G, and are now looking forward towards 5G to leverage its capabilities. The same has been made possible by the efforts of telecom service providers who have been adopting the technologies and equipment from around the world.

While we support the cause of Domestic Manufacturing in the country, however, it **would not be appropriate to prescribe any form of mandate to procure Domestically Manufactured equipment;** as in that scenario, the pace of advancement in telecom service sector would become dependent on domestic manufacturing capability. It is important to promote domestic manufacturing sector but not at the cost of making telecom service provisioning dependent on domestic manufacturing which could impact the competitiveness of Indian Telecom sector.

Further, innovation is a continuous process. Programs like Digital India require the benefits emerging out of innovation from around the world. For example, at present, many innovations are taking place around the world, in the field of 5G, M2M and IoT. Many new frameworks are emerging for making these more and more beneficial to various sectors. Therefore, telecom sector should continue with the flexibility to bring these benefits to Indian consumers at most affordable costs by using equipment from vendors around the world. Any mandate to procure from domestic manufacturers would deprive the Indian telecom service providers of the innovation happening around the world.

Moreover, telecom service sector thrives and competes in a truly interconnected and interoperable world. Networks from around the world are interconnected, therefore, the equipment deployed in the Indian networks need to be carrier grade and best in class irrespective of whether it is manufactured domestically or imported. Any mandate with regard to procurement from domestic manufacturers should not impact the interoperability of Indian networks.

Therefore, we urge that there should not be any mandate for the telecom service providers in India to procure equipment from domestic manufacturers.
