

DDC CATV NETWORK PRIVATE LIMITED

Regd. Off. : Office No. 2, First Floor, Local Shopping Centre, Uday Park, New Delhi - 110049, India
CIN : U64100DL2013PTC260426, Email : coordinateddc@gmail.com, Ph.: +91-11-26535270,

Date.....

Dated: 19/01/2018

Written comments / Suggestions

Consultation Paper on Inputs for Formulation of National Telecom Policy - 2018

The Core mission as outlined in NTP-2018 is to fulfil the communication needs of the people, enterprises and industries at affordable prices

We suggest there should be a mechanism to differentiate data between domestic and international traffic and the consumer is then charged accordingly, Domestic traffic should carry **Zero tariff** than the international. It has been observed that majority of the data traffic in India is domestic (about 80%).

Major Internet giants like Google, Facebook, Microsoft etc. have established their data centers in India and have been providing free of cost connectivity/porting to the ISPs in their data centers, they (Search Engines) even go to the extent to install their servers/equipment for mirroring in bigger ISPs premises without any charges.

We suggest that Government agencies, viz. GAILTEL, RAILTEL, Powertel, BSNL, MTNL, STPI having nationwide broadband access network should also provide free of cost ports connectivity for domestic traffic in their every centres/exchanges/stations across the country.

The Government agencies should also initiate to develop Bharat Search Engine for Domestic traffic, and provide permanent address (email) to every Aadhar Card holder for secured Good Governance.

To develop the state of art secured communication infrastructure for delivering high-quality service would require some encouragements to ISPs as suggested below:

1. End of license regime to reduce the entry barriers for aspirations of new ISP entrants should be encouraged and their entry should be made simple by an easy registration process, which could be made online and transparent. The permission

should be granted on an all India basis without any geographical and service restrictions.

2. All registered ISPs should also get advantage of IP1 and VNO licenses. No separate license/ registration should be required for IP1 and VNO.

3. GAIL, RAILTEL, Powertel, BSNL, MTNL, STPI etc. should increase more number of data centres across the country as they have ample number of manpower, space, power, security, OFC Connectivity and other related infrastructure and skills sets.

4. NHAI, State highways authority should also be directed to lay OFC network along with highways, thereby connecting every district, talukas and village.

5. NTP-2018 should also include Television Broadcasting sector, especially for OTT applications in similar line with the DAS Tariff Order, whereby the digital television broadcast content is easily and impartially be made available to all the ISPs/Stake Holders also.

6. NTP-2018 should also formulate a policy framework for migration from IPV4 networks to IPV6 Networks. Migration should be time bound and linked to some goals and target objectives.

7. NTP-2018 should also formulate an easy and transparent procedures for IPV6 address allocations to consumer end devices.

Capital Expenditure

(a) ISPs have to make huge capital investments in equipment, devices to set up an infrastructure for providing its services. In this process huge amount of money gets blocked in paying direct taxes [GST, customs (Basic Customs Duty) etc.] for processing the said assets due to long gestation period. This issue needs to be resolved by substantial reduction in GST rates (0-5%) and allowing the ISPs to claim 100% depreciation in the year, when assets are put in to use.

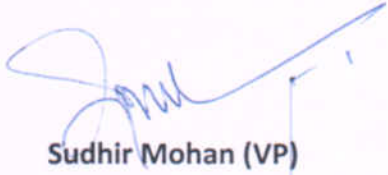
(b) ISPs should be given a low interest rate business loan similar in line with agriculture sector.

Revenue

(a) ISPs play an important role in developing the infrastructure of the country and support various policies of The Government viz., Digital India, Skill India, and Digital Payments etc. ISPs should be incentivized by giving a Income Tax holiday for 8-10 years.

(b) GST rates on subscription charges should be reduced substantially (0-5%) to make usage of Internet (Broadband) for Digital India, Skill India, and Digital Payments etc. as a household product.

(c) We also propose that AGR should also be reduced to zero.



Sudhir Mohan (VP)

Mob: 9811166040