

To,

Dated: 02/FEB/2024

Smt..Vibha Tomar, TRAI

Ms. Vandana Sethi, Advisor (Admin), TRAI

Hope you are having a nice day. Please find my Counter comment that was prepared after glancing through both the consultation paper and the comments posted. It is purposefully not through, to keep the counter comment short enough to make the point.

Both the Paper and comment seem to overlook the following points:

- Liability of distributors whose sellers deploy automated recommendation engines for e-commerce or other uses. Most distributors don't seem to consider if the sellers they supply to have end users and/or end point devices or software or app using the goods or service they provide, use an automated recommendation engine. If so, does it have good quality metrics, design, privacy safeguards, etc
- TRAI (telephone regulatory authority of India) having no explicit framework/guidelines for automated recommendation engines (based on search at URL <https://traigov.in/release-publication/consultation> with start date as 01/01/1997 End date as 02/02/2024 and then glancing through the results) –

Please Note: Although in fairness the subject may be/could be addressed in part or whole or tangentially in consultation papers, comments or counter comments posted in URLs like (to name a few)

- <https://traigov.in/draft-recommendations-ease-doing-telecom-business-comments-stakeholders>
- <https://traigov.in/consultation-paper-unsolicited-commercial-communication-0>
- <https://traigov.in/draft-reporting-system-accounting-separation-regulations-2016>
- <https://traigov.in/consultation-paper-differential-pricing-data-services>
- <https://traigov.in/consultation-note-ip-based-interconnection>
- <https://traigov.in/consultation-paper-definition-revenue-base-agr-reckoning-licence-fee-and-spectrum-usage-charges-0>
- <https://traigov.in/consultation-paper-issues-relating-media-ownership>
- <https://traigov.in/draft-consultation-reporting-system-accounting-separation-amendment-regulations-2012-0>
- <https://traigov.in/consultation-paper-green-telecommunications>

Glancing through the TRAI consultation paper titled “Digital Transformation through 5G Ecosystem” posted at URL https://traai.gov.in/sites/default/files/CP_29092023.pdf and dated 29.09.2023

The traai paper itself was glanced into and the following points could have taken that into consideration in probably the following places:

Chapter 1 (Introduction and background), section 2 (Status of 5g launches and subscriptions worldwide, Figure 1 – Global 5G Projections by 2025, Point 1.6
Chapter 1 , Section 3, 5G deployment in India, Figure 1.2 monthly wireless ARPU (Average monthly revenue per user) , Point 1.11
While in the same section point 1.13 discusses about exporting telecom technology from India to about 18 countries.
Chapter 4 , Section 4 (Likely impact of 5g and associated technologies on global economy , Point 1.15 discusses about economic dividends from deployment of such technologies.
Chapter 1, Section 4, point 1.18 puts the contribution of such technology to 2% of the economy and the GDP at 180 billion by 2030, although the currency is not directly mentioned by is cited for clarification.
Chapter 1, Section 4, Figure 1.5, 5G contribution for select industries in India by 2030.
Chapter 1, Section 6 (collaboration based approach for 5G use case and ecosystems point 1.21 talks about pivot from voice to content to commerce and even industrial applications.
Chapter 1, Section 6, Point 1.22 the core competency of TSP’s (telecom service providers) and of ISP’s (Internet service providers) to a smaller extent by extension is noted to be in providing network connectivity.
Chapter 1, Section 7 (Associated emerging technologies shaping the digital economy), point 1.23 discusses about creation of strong market momentum.
Chapter 1, Section 7, part C (Internet of things), point 1.29 discusses mainly diversification of use cases using various internet enabled devices from traffic to pollution to medical data to industrial processes to agriculture.
Chapter 1, Section 7, Part E discusses 5g and its implications of sectors such as robotics while part F discusses drones and 5G.
Chapter 2 (Ecosystem for 5G use cases), Section 1 Evolution of mobile technologies, the evolution of mobile technology is summarised as continuous chase for higher data rates, higher capacity, lower delay, better spectrum efficiency and flexibility, higher level of QOS provisioning, etc and its deployment being possible in various modes.
Chapter 2. Section 1, point 2.2, discusses massive machine to machine communication capabilities.
Chapter 2, Section 1, point 2.4 discusses how 5G can be deployed in various modes.
Chapter 2, Section 3 (5G special features), Part C (Network slicing), point 2.20 discusses licensed mobile operators being able to create virtual data pipelines for each data service and talks about mobile operators to develop unprecedented business models.
Chapter 2, Section 4 (Use cases in various industry verticals), Part E (Digital financial services) point 2.32 sub point (ii) discusses about the benefits of creating secure and isolated networks to mitigate cyber-attacks but makes no mention of misuse of such facilities of preventing improper deployments of such facilities.

And even after glancing through the Comments in the section posted at URL:

Comment: https://traf.gov.in/sites/default/files/BIF_23012024_0.pdf

From: "Broadband India forum"

In section titled Q1, there is discussion about machine to machine communication and Private 5G and how "WiFi" networks can help in augmenting Radio frequency interference issues and helps in Indoor and in-Building penetration of 5G.

In section titled Q2, discusses the need for License exempt bands, without bringing up the point.

<https://traf.gov.in/consultation-paper-digital-transformation-through-5g-ecosystem>

In my opinion necessitates the need for the same over looked point.

Comment: https://traf.gov.in/sites/default/files/DECT_23012024.pdf

From: " DECT Forum"

Dect Forum seems to work on the issue of bringing 5G networks to smart phone devices, in particular quoting from the URL cited above: "DECT NR+ can be deployed by any organisation, independent from any operator or service provider."

While the rest of the document seems to discuss about differentiating professional and consumer usage, which is highly relevant, it does not seem to go far enough before discussing spectrum allocation for the technology in sections titled Q.1, Q.2

In my opinion necessitates the need for the same over looked point

Comment: https://traf.gov.in/sites/default/files/ITU-APT_23012024.pdf

From : "ITU-APT Foundation of India (IAFI)"

In section titled Q-1, While it discusses about Germany encouraging private 5g networks for industrial usage and manufacturing , infrastructure, etc in various countries briefly states "Raise awareness of 5G, by educating businesses and consumers about the Benefits of 5G" while section titled "Q.4", 9. Address Cybersecurity Concerns – states the need for protecting IoT devices and data

In my opinion necessitates the need for the same over looked point.

Comment: https://traf.gov.in/sites/default/files/NASSCOM_23012024.pdf

From : "NASSCOM"

In sections titled Recommendation 1, Recommendation 3, 2 Recommendation 4, Recommendation 5, etc discusses improving safety for internet of things devices.

In my opinion necessitates the need for the same over looked point.

Comment: https://traf.gov.in/sites/default/files/ACT_23012024.pdf

From : "ACT | The App Association"

No comment, but does not seem to address the issue but seems to mention things like Department of Telecommunications (DOT) proposal to overhaul its Universal Service Obligation Fund (USOF)

Comment: https://traf.gov.in/sites/default/files/DIPAAA_23012024.pdf

From: Digital Infrastructure Providers Association (DIPA)

In section titled Q1, makes note of various countries digital transformation initiatives including India's digital transformation initiatives while section titled Q2 mentions Low awareness among industries and consumers and consumers hesitancy to adopt 5G networks. In section titled Q.3 it mentions Digital Bharat Nidhi is a newly established fund in India, replacing the Universal Service Obligation Fund (USOF) under the Telecommunications Bill 2023. It will promote and accelerate the development of digital infrastructure and services across India,

In my opinion necessitates the need for the same over looked point.

Comment: https://tra.gov.in/sites/default/files/Priyank_23012024.pdf

From : Priyank Chandra

While section titled Q1 Differentiates between Different industry segmentation like Consumer business, enterprise business but mostly concerns itself to whether 5G is needed in many cases. While section titled Q.3. seems to discuss the need for low latency applications. Section titled "Q.11" discusses Digital Personal Data Protection Act, 2023 and its applicability to this consultation paper

In my opinion necessitates the need for the same over looked point.

Other comments in its entirety can be accessed at URL <https://tra.gov.in/consultation-paper-digital-transformation-through-5g-ecosystem> (For actual cited texts in entirety or all comments received for the consultation paper.

Thanking you,

Yours faithfully,

Hari

(Hari nath)