

**NASSCOM's Feedback
Telecom Regulatory Authority of India (TRAI) Consultation Paper on Licensing
Framework and Regulatory Mechanism for Submarine Cable Landing in India**

Shri Sanjeev Kumar Sharma
Advisor (Broadband and Policy Analysis)
TRAI
February 23, 2023

The National Association of Software and Service Companies (**NASSCOM**) welcomes the opportunity to submit our response to the Consultation Paper on “*Licensing Framework and Regulatory Mechanism for Submarine Cable Landing in India*” (**Paper**) released by the Telecom Regulatory Authority of India (**TRAI**) in December 2022ⁱ.

While the TRAI has raised various issues in the Paper, we take this opportunity to respond on two limited issues:

1. Need for Facilitating Additional Cable Landing Stations (CLSs) Infrastructure for Network Diversity and Augmenting Bandwidth

While capacity requirements for international submarine cable bandwidth have gone up significantly over the last 5 years, actual usable cables which can cater demands of such customers are very limited. All these usable cables are concentrated in Mumbai (for connectivity to Europe) and in Chennai (for connecting Asia Pacific destinations), so there is limited network diversity at play in current scenario. Moreover, other existing CLSs in Cochin, Trivandrum, Tuticorin are low-capacity systems.

We appreciate that the two new locations, Digha (West Bengal) and Mahuva (Gujarat) have been identified and are under planning/ construction stage. The TRAI itself has recognised in the Paper that India is set to register the highest growth in Asia Pacific Submarine cables industry and the market is expected to reach US\$ 78.6 Mn by 2030ⁱⁱ. To cater to this projected demand, there is a need to encourage and facilitate the establishment of additional CLSs but closer (<150-200kms) to main cities like Mumbai, Chennai, Hyderabad, Bangalore, and Pune which are currently candidates for the establishment of hyper-scale Data Centre infrastructure.

Potential landing points could be identified in other cities near Mumbai (Vapi, Daman, Mongrol, Mundra, etc.), cities north of Chennai (Vizag, Chirala, etc.). These places are not too far from key aggregation locations. For instance, Vapi/Daman can be connected with Mumbai with 150-200kms fiber backhaul or Vizag can be connected with Hyderabad with less than 250kms fiber backhaul network.

Recommendation

There is a need to encourage and facilitate the establishment of additional CLSs closer to main cities like Mumbai, Chennai, Hyderabad, Bangalore, and Pune which are currently candidates for the establishment of hyper-scale Data Centre infrastructure.

2. Need for Expediting Timelines for Regulatory Approvals Required for Cable Repairs in Indian Territorial Waters

Currently, submarine cable repairs in Indian territorial waters require approvals from multiple agencies, all of which are requisitioned through the Department of Telecommunications (**DoT**) acting as a single window. Additionally, customs approvals are required for import of repair vessels. Despite this, the timeline for obtaining all requisite approvals is approximately 12-16 weeks, resultantly delaying the process of cable repair between 3-4 months. In comparison, similar approvals are typically obtained within 2-3 weeks, in markets like Singapore, Philippines and Vietnamⁱⁱⁱ.

Resultantly, the TRAI should consider appropriate recommendations to speed up obtaining regulatory approvals for submarine cable restorations, impacted during operations. One of the potential solutions could be to award advance approvals for 18-24 months so that any repair required can be expedited and completed in 2-3 weeks. There is also a need to standardise the approval process as different ports follow different standards now. This will help in streamlining the process.

At present, owners of submarine cables have systems in place for repairing damaged cables in an efficient and cost-effective manner. Such a system is based on a few ships being responsible for repairing cables across different jurisdictions. While having an Indian flagged repair vessel may seemingly shorten the lead time to commence repairs, the same will entail greater costs, which will, ultimately, get passed on to the consumers. It is thus better to expedite the approval process.

Recommendation

There is a need to speed up obtaining regulatory approvals for submarine cable restorations, impacted during operations. There is also a need to standardise the approval process as different ports follow different standards now. This will help in streamlining the process.

For any queries related to this submission, please contact:

Ashish Aggarwal (asaggarwal@nasscom.in), Vertika Misra (vertika@nasscom.in) or Sudipto Banerjee (sudipto@nasscom.in).

About NASSCOM

The National Association of Software and Services Companies (**NASSCOM**) is the premier trade body and chamber of commerce of the Tech industry in India and comprises over 3000 member companies including both Indian and multinational organisations that have a presence in India. Established in 1988, NASSCOM helps the technology products and services industry in India to be trustworthy and innovative across the globe. Our membership spans across the entire spectrum of the industry from start-ups to multinationals and from products to services, Global Service Centres to Engineering firms. Guided by India's vision to become a leading digital economy globally, NASSCOM focuses on accelerating the pace of transformation of the industry to emerge as the preferred enablers for global digital transformation. For more details, kindly visit www.nasscom.in

Endnotes

ⁱ See, Telecom Regulatory Authority of India, '[Consultation Paper on Licensing Framework and Regulatory Mechanism for Submarine Cable Landing in India](#)', (December 2022).

ⁱⁱ See, '[Consultation Paper on Licensing Framework and Regulatory Mechanism for Submarine Cable Landing in India](#)', Page 4, (December 2022).

ⁱⁱⁱ See, Time taken for [Submarine Cable Repair](#)