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Subject: Cloud services Consultative Note ! TRAI
To: advqos@traf.gov.in

Q1

There is only need for a SRO for CoC (like PCI for wallet cos in IMAI and BCFI for Business Correspondents). And single entity is best. To prevent internecine warfare, fratricide and intra industry tussles (e.g Telecom).

Q2,3 and 4

There should be no artificial thresholds or pre requisites. The MPFI started in 2007 and anyone could pay 10,000 rupees per annum (initially free) and become a member and obviously this was in the area of Mobile Payments. This was the precursor to the formation of the PCI – which is doing good work. This led to a boom in interest and awareness of benefits and market potential of mobile payments (the precursor to fintech). And was a runaway hit. The early days of the IMAI was similar, except the membership fee was based on size of the co w.r.t turnover or Capital employed, or nos of people employed and for specific individuals who are industry stalwarts a Individual Membership rate

Q5

Should be left to the seeded Industry body to work out its charter and ambit and terms of reference successful examples are there from ISPAI, BCFI, MicroFIN, PCI, NASSCOM etc

Q6

Hands off Policy by Govt/TRAI with only loose observer status and same at Apex representation level of prospective entry. A steering Committee or Cloud services Oversight Body may then be constituted with reps from GoI, Public, Industry ,Law, Tech, Business, Evangelist, entrepreneurs, start ups in the Cloud service providers and Cloud user businesses space – as similarly proposed for the Payments Regulatory Board as suggested by the Watal committee

Q7

- Encryption / Cryptography provided by Cloud service Providers – both off shelf APIs and propriety. Encryption over the air from client /remote device to cloud. Encoding and storage of data on various cloud type providers.
- Data security and transportability of data from In house to Cloud and reverse. Interoperability between cloud service providers. Exit and removal of data and indemnities

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And

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Meet us at [CPI Middle East & Africa Summit in Dubai on Nov 4 & 5.](#)