

Ref: Your office Ir.no. Nill, dated 21st Sep 2022
SUB: Comments on the draft Indian Telecommunication Bill 2022

To
Respective Authorities, DOT, MOC, New Delhi.

Please find the following inputs/comments on above subject:

Chapter2

2(3)

In “assignment” **Include** “*for a geographical area*”
“specified conditions” is vague scope, **so properly explained**

2(5)

“person” is to be **replaced** by “customer (individual or business or society or.....)”

2 (17)

Include “light” also along wire, radio, optical,etc.

2 (22)

“person” may be **replaced** by “*customer (individual or business or society or...)*”
Include “*Individual with legally eligible age*”

2 (23)

Include at the end of paragraph
“*but shall not include customer equipment*”

2 (24)

Modify first line as
“wireless communication” means any telecommunication “*delivered through telecommunication network*” without the use of.....

2(25)

Add point (25)

Geographical area:

This is the area, across which, licensee is bound to deliver Telecommunication services to the users irrespective of user location i.e urban, rural, remote, hilly, vally, hard to reach areas etc.

Chapter 3:

5 (9)

Modify 3rd line as

.....remained unutilized ***whole or part of the geographical area of assignment*** for insufficient reasons.....

5 (10)

Include at the end of the paragraph
and unauthorized use of spectrum.

10

Replace starting “Any person” with “Anyone”

Chapter-4

12 (2)

Include in the 5th line

.....or over ground or “***under, along & across water bodies or water flows***” or under-sea....

17

Under illustrations (a), **include**
Railway tracks, Metro tracks, tunnels

Chapter 6

23

(a) Include Customer premises equipment (CPEs)

Add following point/s as

(d) Occupational safety & Health standards for the persons working for telecommunications (example: OSHA standards for Riggers, etc.)

(e) Radiation standards for the transmitting/receiving antennas used for delivery of telecommunication services

(f) Indian Standards for various mobile phone operating systems

(g) Standards for servers/hosting infrastructure for protecting to store/transmit un-lawful content to users through telecommunication services

(h) Standards for various equipment/devices, etc. reducing e-waste generating due to telecommunications (for universal modems, universal set-up boxes, universal adopters, etc.)

Chapter 7

29

Support skill development and training in telecom, is the activity of HRD or Education ministry, hence, it is not appropriate to use this fund for skill & training.

Point (c) is to be modified as

(c) Capacity building

Add points

(f) supporting incubation & innovation centers

(g) developing various Telecommunications Standards

34.

Duties of users mentioned, but duties of entities to protect privacy of users not mentioned.

Include Duties of entities to protect privacy of users

36

Include air drones, water drones

With best wishes

Vas KSS