

ISPAI Comments to TRAI Consultation Paper on Cloud Services

Issues for Consultation

Q.1 Whether there should be single industry body or multiple industry bodies of cloud service providers which may be registered with DoT? If multiple industry bodies, whether there should be any cap on their number? Should the industry bodies be registered based on the category or type of CSPs? Can a CSP be a member of multiple industry bodies? Please suggest with justification.

Response: The cloud industry needs not to be regulated by registering with DOT just like the Telecom and ISP industry are regulated by DOT. Let's not regulate cloud.

Q.2 What should be the eligibility criteria for an Industry body of CSPs to register with DoT? What is the list of documents that should be required to be submitted as proof of eligibility? What obligations should be cast upon the Industry Bod(y)(ies) after registration with DoT? Please suggest with justification.

Response: Please do not register with DOT

Q.3 What may be the threshold value of parameters such as the volume of business, revenue, number of customers etc. or combination of these for a CSP to mandatorily become member of a registered Industry body? Please suggest with justification.

Response: Please do not register with DOT

Q.4 Whether entry fee, recurring fee etc, need to be uniform for all members or these may be on the basis of type or category of members? How such type or category can be defined? Should such fee be prescribed by DoT or be left to be decided by the Industry body ? Please suggest with justification.

Response: No fees and no registration with DOT should be there.

Q.5 What should be the guiding principles for governance by an industry body? How would these principles/ organisation structure ensure fair, reasonable and non-discriminatory functioning of body? Should structure of Governance be prescribed by DoT or should it left for the industry body to decide? How can the industry body achieve the desired deliverables efficiently and effectively? Please suggest with justification.

Response: It should not be governed by DOT.

Q.6 What policy may be adopted for initial formation of industry body for cloud services? Please suggest with justification.

Response: Anyone who provides cloud services should be allowed to be a member and no registration with DOT should be required.

Q.7 Any other issue which is relevant to this subject? Please suggest with justification.

Response: No Comments