

Date: 9th Feb 2023

Your Ref: Consultation Paper No.15/2022, dated 23rd Dec 2022

To
Shri Sanjeev Kumar Sharma
Advisor (Broadband and Policy Analysis)
TRAI, New Delhi

SUB: CP on Licensing Framework and Regulatory Mechanism for Submarine Cable Landing in India-
Regarding

Respected Authorities,

Please find herewith the following inputs/comments on the subject above:

For the past many years, few of the following questions are un-answered:

- why India is not playing major role in doing business particularly in the area of International submarine cables (Laying or manufacturing)???
- why India do not have OFC ships (vessels)???
- why India is depending on others for laying submarine cable to our Islands???

Let us be “Aatma Nirbhar” now onwards.

Few years back, while providing inputs, suggested that India should have OFC route along with our coastal line either terrestrial or submarine as a shared infrastructure among TSPs. As well, during various meetings, while discussions, observed no response whenever mentioned about having coastal submarine OF cable as an alternate route.

Now, authorities got an Idea to lay OF cable along our coastal line. Congratulating them.

Q (2):

2.10 Option (i) is reasonable. Keeping in view of strategic location, X may be $\geq 10\%$.

Q (3).

Keeping in view of inputs provided in CP, as present system has high mobilization time, If, India enters in this area will help to reduce the delays.

Q (4)

West side: 2 vessels required, one at Mumbai and another at Cochin
East Side: 2 vessels required, one at Kolkata and another at Visakhapatnam.

Store yards near to these ports.

India have own ship building facilities, so can build own vessels.

So many telecom manufacturing units/factories are available in India, so production of Sub-marine cable and related equipments/accessories will not a big challenge, that too in the present era of “Aatma Nirbhar Bharat”

This generate new area of employment.

Q (5) & Q (6)

Cost of initial establishment of coastal submarine cable may needs infusion of additional capital by existing players.

Over this newly proposed coastal submarine OF cable, there will be possibility to develop new innovative applications/systems that helps to protect our country as a Techno-Coastal guard, in addition to carrying domestic traffic.

Hence, Govt. need to fund and take-up this project. Any of telecom PSU maybe assigned this work on behalf of DOT.

Cost can be recovered by leasing the capacity to various TSPs.

A detailed study to be made to finalize the proposed Coastal Submarine OFC route, so that it will be **with in Indian Waters**.

Instead of submarine, it may also think to lay OF cable along with sea coast (terrestrial) or a combination of both basing on the feasibility and practicability.

Q (9)

To honor land of laws, all major on-line players need to establish country specific CDNs & Data Centers. Combination of Data Centers & Submarine OF cables will bring more business to India. Dedicated end to end Terrestrial OFC links provided between different Submarine OF routes will attract more players.

Other inputs:

Specific enforcement teams are to be in place to check irregularities.

Teams to inspect CLSs on periodic basis.

Dredging PSU (DCI), PSU Ports, Telecom PSUs, Ship building PSUs can form a consortium to manage this new business.

With best wishes

Vas KSS