



COAI

ISSUE
November 2025

I-DIGEST

Connecting the World

News for you,
information that matters



www.coai.in

CONTENT

- 3 From DG's Desk
- 4 COAI Latest Updates
- 6 News Wires





LT. GEN DR. SP KOCHHAR (RETD.)

Director General, COAI

From DG's Desk

November 2025 marked an important month for India's telecommunications ecosystem as the Ministry of Electronics and Information Technology notified the Digital Personal Data Protection (DPDP) Rules 2025, completing the operationalization of the DPDP Act 2023. While COAI welcomes this comprehensive data protection framework, we have raised significant concerns about implementation gaps that, if unaddressed, could create unnecessary compliance burdens and operational challenges for telecom operators already managing complex regulatory requirements.

The DPDP Rules represent India's commitment to balancing citizen data rights with lawful data processing. However, most of the critical concerns COAI raised during public consultations remain unresolved. Key issues include ambiguities around security compliance frameworks, age verification for minors (16-18 years) acquiring SIM cards and overlapping breach-reporting obligations across multiple regulatory regimes—IT Act, CERT-In directions, DoT guidelines, and now DPDP framework.

COAI has advocated for practical harmonization of sector-specific telecom regulations with the DPDP framework to minimize duplication and ensure smooth transition. We've specifically recommended that consent management restrictions prohibiting director involvement be reconsidered, as established telecom organizations possess the expertise and infrastructure required for responsible consent management. Rather than mandating external consent managers, regulators should permit either a single, interoperable telecom-sector consent layer or recognize robust internal systems that fully comply with DPDP standards.

COAI has also recommended that Data Protection Impact Assessments recognized under international standards like GDPR be accepted, and that security safeguards be evaluated using a calibrated, risk-based approach reflecting telecom networks' inherent layered security architecture—not solely encryption and masking.

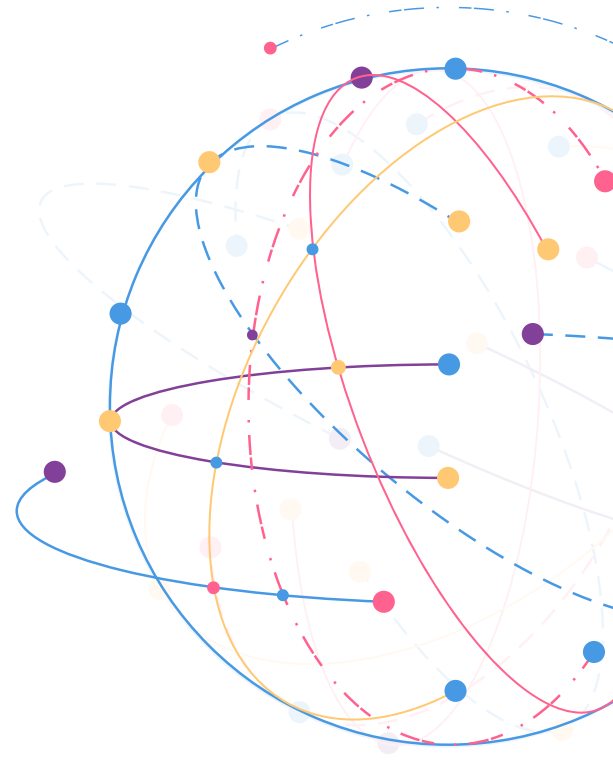
Beyond data protection, November also highlighted persistent challenges in 5G monetization. COAI's DG emphasized that despite massive capital investments and fastest-in-world 5G rollout, operators struggle to translate network investments into revenue growth due to absent compelling use cases and incomplete infrastructure deployment. This structural challenge underscores the critical need for supportive regulatory policies that ensure sustainable investment capacity.

COAI remains committed to establishing a strong, secure data protection ecosystem while advocating for implementation frameworks that recognize telecom's foundational role in India's digital infrastructure. We are compiling detailed inputs for MeitY and emphasize the principle that specific sectoral regulations should take precedence over general frameworks when conflicts arise. The path forward requires regulatory evolution that balances innovation and security with practical implementation, ensuring India's digital growth remains secure, inclusive, and sustainable.



COAI

Latest Updates:



Draft Telecommunication Tariff (72nd Amendment) Order, 2025

COAI submitted its comments to TRAI on 07.11.2025 highlighting that a better alternative would be to focus on collaborative approach and strengthening reporting processes, rather than introducing punitive financial disincentives. It was recommended that

- (i) TRAI may retain or rationalise the current ceiling and rate of financial disincentive to ensure proportionality.
- (ii) Treat first-time or inadvertent delays for first 7 days as minor procedural lapses leading to warning letters without financial disincentive.
- (iii) Limit disincentive only to repeated or deliberate defaults and at a level that is reasonable.
- (iv) Ensure alignment with the Jan Vishwas reforms and the Ease of Doing Business agenda by avoiding punitive compliance burden.

Draft Reporting System on Accounting Separation (Amendment) Regulations, 2025

COAI submitted its comments on the draft Regulations to TRAI on 07.11.2025. It was recommended that TRAI may

- (i) Review, reduce and eventually discontinue the requirement for submission of ASR and rely on audited financial statements and AGR certificates for analytical and statistical assessments. This can be achieved through a consultation process by the Authority with all stakeholders.
- (ii) The Authority may consider not introducing or enforcing any financial disincentive mechanism under the ASR framework, especially those linked to turnover.
- (iii) If statistical data is still deemed necessary, it may be collected on a voluntary or best-effort basis without any financial or punitive consequences.
- (iv) Align the regulatory framework with the spirit of the Jan Vishwas Bill and the Telecommunication Act, 2023, focusing on simplification, proportionality and regulatory certainty.

COAI also requested the Authority to kindly convene an industry meeting for allowing our member TSPs to share their concerns on this draft Regulations.

Draft Telecommunications (Authorisation for Telecommunication Network) Rules, 2025

COAI submitted its comments on the draft rules with DoT on 13.11.2025. It was submitted that DoT

- (i) Publish a compendium of all final draft rules for a

holistic stakeholder review before gazette notification.

(ii) The compendium should include an explanatory note, similar to the draft Telecom Bill.

(iii) The compendium must clearly define which entities fall under the Act's authorisation framework (e.g., TSPs, ISPs, M2M providers).

(iv) There should be "zero authorisation fee" for Infrastructure Providers (IPs) in the draft rules. Retaining this is crucial for enabling infrastructure growth, competitive neutrality, and low barriers to entry.

(v) Our key recommendations include a user-friendly single-window portal, automatic migration for existing IPs, DoT-facilitated Right of Way (RoW) approvals, no retrospective dues, a simple renewal process, and ensuring non-discriminatory access to infrastructure.

(vi) Regulations for IP authorisation must be proportional.

(vii) The draft rules should align with the Act's intent to reduce regulatory burden.

State Broadband Committee (SBC) meeting of Rajasthan

15th SBC meeting of Rajasthan was held on 04.11.2025, chaired by the Chief Secretary of Rajasthan. Important issues including regularization of towers, deployment of common duct, concerns related to on ground enforcement of Right of Way Rules 2024 and onboarding of all land-owning departments still pending on SSO portal were discussed.

Submission to Deputy Chief Minister, Maharashtra

A submission was made to Shri Eknath Shinde, Deputy Chief Minister, Maharashtra on 17.11.2025, requesting for an in-person industry meeting. This meeting would allow the industry to discuss collaborative ways with the state of Maharashtra to further enhance its existing Digital Connectivity.

Submission to Chairman Mumbai Port Trust

A letter was written to Chairman of Mumbai Port Trust on 19.11.2025, requesting to discontinue the recurring monthly charges being levied on the underground Fiber deployed. It was submitted that the same should be stopped with effect from 01.01.2025 in compliance with the RoW Rules 2024.

Draft Tamil Nadu Telecom Infrastructure Policy, 2025

The state government of Tamil Nadu issued the Tamil

Nadu Telecom Infrastructure Policy, 2025 and sought comments from the LSA. On 21.11.2025, COAI formally suggested to the LSA that issuing a separate policy is not required and instead the state should issue an administrative order to implement the RoW Rules 2024, as notified by the DoT.

DO to New Chief Secretary, Rajasthan

A congratulatory DO was written to Shri V. Srinivas, IAS, on assuming the role of Chief Secretary, Government of Rajasthan. COAI assured its commitment to continue working closely with the state and strengthen cooperation between the Government and the telecom industry.

District Level Telecom Committee (DLTC) meeting of Bandra Suburban of Mumbai

A DLTC meeting was chaired by Resident Deputy Collector, Bandra on 25.11.2025. Our members attended the same and raised RoW related issues like challenges of implementation of RoW rules at ward level, CBuD App usage, online portal concerns, time taken for giving permissions among other things.

State Broadband Committee (SBC) meeting of Andaman & Nicobar

The 4th SBC of Andaman & Nicobar was organised on 26.11.2025. This meeting was chaired by the Chief Secretary. Important issues like permissions in forest areas, electricity connections and preferential logistical support were raised by the LSA on industry's behalf.

Submission to Chief Secretary, West Bengal

A submission was made to the Chief Secretary of West Bengal on 17.11.2025, reiterating the industry's request to issue an administrative order for implementation of the Right of Way Rules 2024 in the state at the earliest.

Submission to Chief Secretary, Jammu & Kashmir

A letter was submitted on 28.10.2025 to the Chief Secretary, Jammu & Kashmir, post the State Broadband Committee (SBC) meeting, highlighting support to telecom industry on key challenges related to the Right of Way Rules.

Meeting with Delhi LSA on Right of Way Matters

An in-person industry meeting was chaired by DDG Rural, Delhi LSA on 30.10.2025. The participants discussed various Right of Way (RoW) related issues and deliberated on the major concerns which can be tabled during the next State Broadband Committee (SBC) meeting.

District Level Telecom Committee (DLTC) meeting at West Delhi

The industry attended an in-person District Level Telecom Committee (DLTC) meeting on 04.11.2025, chaired by the District Magistrate (West), Delhi, at Raja Garden. The meeting focused on addressing RoW challenges at the district level.

Submission on Draft Electricity (Amendment) Bill, 2025

As part of Government Reforms, the Ministry of Power had issued a Draft Electricity (Amendment) Bill on 09.10.2025. Industry's compiled inputs were submitted by COAI on 08.11.2025.

Uttar Pradesh State Broadband Committee (SBC) Meeting
Uttar Pradesh State Broadband Committee (SBC) meeting was held on 11.11.2025 under the chairmanship of the Chief Secretary. COAI presented multiple RoW issues

being faced by members and requested the State's intervention for faster on-ground implementation of the rules.

Submission to Chief Minister, Delhi

A submission was made on 11.11.2025 to the Chief Minister, Delhi, requesting that directions be issued to DISCOMs to stop the cutting of deployed Aerial OFC and to allow deployment of Aerial Fiber on the MCD poles, thereby enhancing digital connectivity in the State.

Submission to Chief Secretary, Chandigarh

A submission was made to the Chief Secretary, Chandigarh, on 11.11.2025, requesting directions to the Chandigarh Municipal Corporation for alignment with the RoW Rules, 2024.

NBM Meeting with Ministry of Railways

An online industry meeting was convened on 13.11.2025, by the National Broadband Mission (NBM) with the Ministry of Railways and TSPs, to review the leasing framework for spare OFC laid by Indian Railways.

Submission to Central Electricity Authority (CEA) on Metering Regulations

A submission was made on 17.11.2025 to the Member (GO&D), Central Electricity Authority, requesting an industry meeting to discuss the urgent notification of the amendment to the Metering Regulations.

Meeting with Secretary, Delhi Electricity Regulatory Commission

A meeting was held on 20.11.2025 with the Secretary, Delhi Electricity Regulatory Commission (DERC), to deliberate on multiple industry concerns, including high pole leasing charges by DISCOMs, Green Energy Open Access amendment alignment and extending industrial category tariff to Telecom industry.

Nodal Officer Confirmation from Government of Haryana

Vide an email dated 24.11.2025, the Government of Haryana confirmed the appointment of Special Secretary (Citizen Resources Information Department) as the Nodal Officer for Haryana State, under Section 14(4) of the Telecommunications Act, 2023.

Confirmation from Lakshadweep Administration on Right of Way Rules 2024

On 13.11.2025, the Administration of Lakshadweep confirmed to the Kerala LSA about implementation of Right of Way Rules 2024 in the Union Territory.

State Broadband Committee (SBC) meeting of Maharashtra

SBC meeting of the state of Maharashtra was held on 19.11.2025, which was chaired by the Chief Secretary. Important issues including regularization of towers, availability of common duct, concerns related to on-ground enforcement of Right of Way Rules 2024 and onboarding of all land-owning departments on portal were discussed.

Submission to Secretary (T) on DG Set norms of CAQM

A submission was made to the Secretary (T) on 25.11.2025, requesting support in getting exemption on the DG Set norms issued by Commission of Air Quality Management in NCR (CAQM) for the Telecom industry.

COAI Additional inputs to Government for Budget 2025-26

On 06.11.2025, COAI submitted its additional inputs to the Ministry of Finance on Union Budget (2025-26) for consideration.

The following issues were submitted to the Government:

1. Exemption on Levy of Service Tax on Incremental LF and SUC Payments.
2. Manner in Calculation of Interest on wrongful utilization of IGST, CGST and SGST.
3. Levy of Compulsory Interest on Payment of Tax with interest on non-realization of export proceeds.

Pre – Budget Meeting in Ministry of Finance

A meeting was called by Member (GST, CX, ST), in Central Board of Indirect Taxes and Customs on 24.11.2025 to discuss the COAI Pre – Budget Recommendations.

The following issues were discussed in detail:

1. Requirement of Authorization for every transaction in the Special Economic Zone even for Zero Rated Supply.
2. Manner of Calculation of Interest under Rule 88B of CGST Rules.
3. Levy of Compulsory Interest on Payment of Tax with interest on non – realization of export proceeds.

Request for extension regarding Suspension of USSD based Call Forwarding Facility

- 1) TSPs were instructed to implement the immediate disabling of USSD-based call forwarding codes in the discussion with DoT on 15.10.2025.
- 2) In this regard, COAI submitted a letter to DoT on 05.11.2025 requesting an extension of 30 days to disable the USSD-based call forwarding codes.

Representation on Inclusion of Critical Issues in Terms of Reference (ToR) for Technical Evaluation of D2M by Prasar Bharati

- 1) COAI Letter was submitted to MIB on 19.11.2025 on Inclusion of Critical Issues in ToR for Technical Evaluation of D2M by Prasar Bharati.
- 2) In the letter, COAI requested:
 - a) ToR for technical evaluation being finalized by Prasar Bharati comprehensively cover all the critical aspects highlighted in the letter.
 - b) Conduct stakeholder consultation under the aegis of DoT/TRAI.
 - c) TEC conducts open consultative process understanding the standards, good practises & KPIs required for performance evaluation of D2M.

Request for Assignment of Entire 6 GHz band for IMT (5G/6G) services

- 1) COAI Letter was submitted to DoT on 06.11.2025.
- 2) In the letter, COAI requested that:
 - a) The entire 5925–7125 MHz band may be kindly considered for identification and reservation for IMT/6G services in India.
 - b) A clear refarming plan may be developed
 - c) Seek TRAI's Recommendation on 6GHz spectrum.
 - d) Adopt an IMT band plan that provides wide contiguous carriers (≥ 400 MHz) per licensee to enable future 6G performance targets.

TRAI on the CP on the Auction of Radio Frequency Spectrum in the Frequency Bands Identified for IMT.

- 1) TRAI Consultation Paper on the "Auction of Radio Frequency Spectrum in the Frequency Bands Identified for International Mobile Telecommunications (IMT)" was released on 30.09.2025.
- 2) In this regard, COAI submitted its comments to TRAI on 11.11.2025.
- 3) In the response, COAI submitted that:
 - a) There is no structural over-supply of spectrum in India.
 - b) Entire available spectrum in the existing bands should be put for auction.

- c) Most optimal and efficient manner for 600 MHz should come with n105 band plan, which gives 2x40 MHz spectrum.
 - d) We recommend approach of prescribing no rollout obligations if an existing licensee has already met the obligations.
 - e) The reserve price be fixed at a rational % to the valuation of the assessed valuation of spectrum.
- 4) COAI also submitted its counter comments to TRAI on 18.11.2025.

DPDP Rules 2025 issued by MEITY

On 14.11.2025, DPDP Rules were notified. The framework will within 18 months operationalize a purpose-limited, notice-and-consent-driven model with strict reporting timelines and broad fiduciary accountability. However, key gaps remain around the security compliance framework, age verification, DPIA requirements, breach-notification thresholds, and alignment with sectoral laws. The industry is awaiting further discussions at the industry level notifications and parameter-setting to operationalize the regime efficiently.

Draft Guidelines on Accessibility of Content on Platforms of Publishers of Online Curated Content (OTT Platforms) for Persons with Hearing and Visual Impairment

COAI submitted its response to MIB on 10.11.2025, outlining key recommendations to refine the guidelines to avoid overlaps with existing sectoral regulations. Also recommended a phased or sandbox-based rollout to account for varying technical and resource capacities across platforms.

Comprehensive Framework on Accessibility Standards for Service Sector – Proposed Recommendations

COAI submitted its response to DePWD on 24.11.2025 reiterating that the DoT directions are under implementation by the members. The submission emphasized that introducing an additional or parallel standard or a separate compliance mechanism, is unnecessary and may lead to duplicative obligations. Adoption of Draft Guidelines for the Prevention and Regulation of Unsolicited and Unwarranted Business Communication, 2024

Representation send to DoCA on 05.11.2025 requesting to issue the Guidelines to create a harmonized and enforceable accountability mechanism for originators of unsolicited business communications.

COAI submitted a letter on 24.11.2025 requesting relaxation towards the issue of Experimental License on Saral Sanchar Portal

Following request has been put across:

- a) Increasing the per-model quantity limit for Experimental Licenses to 500 units and the request that the same be modified on Saral Sanchar portal.
- b) Extending the validity of the initial Experimental License from 1 year to 5 years, with a provision for subsequent renewals for a minimum period of 2 years each.
- c) Introducing appropriate safeguarding mechanisms to enhance the overall integrity of the Experimental Licenses



COAI News Wires:

Telecom Operators Still Struggling to Monetise 5G, Says COAI DG.

[Outlook](#)

Telecom operators slam Trai's draft rules, call 1% turnover penalty excessive

[Livemint](#)

India's 6G spectrum: Why telecom giants want control over the airwaves

[The Print](#)





Contact Us

Address : 14, Bhai Veer Singh Marg, New Delhi – 110 001

Phone : +91 – 11- 23349275 | Fax: +91 – 11 – 23349276

Email : contact@coai.in | Website: www.coai.in

Get to know us better. Our social media platforms are a great way to learn about our upcoming events, opportunities, latest trends and more. Follow us and join a diverse group of people across the nation and all around the world

Follow us on:

