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India is going through one of the most challenging periods in its recent history. The outbreak of the COVID-19 pandemic has adversely affected every segment of the society. It has also cast a shadow on the economic well-being of the country. During this critical period, the telecom sector has proved to be the backbone of the country to ensure connectivity. The telecom sector has made various sectors such as banking, education, etc offer their services available to the general public from the vicinity of their home through internet and mobile. Facilities like work from home, online classes, online payments, amongst others, continue to be available to citizens. The telecom services has truly become an “essential service” like water, roads and electricity.

During this difficult period, the DoT, TRAI and various Government Authorities have joined hand with the telecom service providers (TSPs) to ensure connectivity and also functioning of the online services while following the norms of social distancing. TRAI has also ensured that the TSPs are given appropriate support so that they can concentrate on operation and maintenance of their network and quality of service. TRAI, among other things, allowed six weeks extension to the TSPs to comply with their statutory reporting requirements. The COVID-19 outbreak has shifted the way many sectors do business and has focused on various digital on-line means by which companies can conduct their business and operations. Post COVID-19, the telecom sector will continue to remain a critical and supportive part of the functioning of just about all sectors so that the country’s economy can bounce back to the path envisaged.

In the past year, in addition to addressing the challenges thrown up by the COVID-19 pandemic, TRAI has taken various measures to ensure orderly growth of the sector and protection of the interests of telecom consumers. As a forward looking regulatory body, TRAI continued to collaborate extensively with the COAI, the industry and other stakeholders to come out with innovative policy interventions and also adopted some of the best globally accepted practices and customised them for the Indian market, wherever required. The Authority has made various recommendations which are expected to benefit the sector in the long run. The Authority has also made recommendations to the Government of India on License Fees and Spectrum Usage Charges, to address the financial health of the sector.

5G will soon be a reality in India and TRAI is carrying out various initiatives on 5G, such as recommendations on the spectrum bands, releasing a white paper and organising workshops/seminars on 5G related topics. The industry, I am sure is also working on the planning and strategy to provide 5G based services to the customers. COAI is an effective interface between the industry, policymakers and the regulator. The role played by COAI for the betterment of the industry and implementation of the Digital India vision of the Government is commendable.

I wish COAI all success in all its future endeavours and successful completion of the Annual General Body Meeting 2020.
MESSAGE

I am happy to learn that the Annual General Meeting of the Cellular Operators Association of India (COAI) is being held on 2nd July, 2020 and on this occasion the Annual Report for the year 2019-20 will be unveiled. COAI and the member constituents are an integral part of the telecommunications ecosystem in India. Robust performance by COAI and the constituent members significantly contributes to meeting the telecommunications needs of the country.

The year 2019-20 has witnessed expansion of telecommunications networks including coverage of the Indian population by 4G technology and phenomenal data consumption per mobile subscriber at prices which are, perhaps, lowest in the world. National Broadband Mission was launched in December 2019. Most important, however, was the challenge posed by the onset of the global pandemic of Covid-19 and the befitting response of the Telecommunications Sector to this major threat.

The entire Telecommunications Industry including the Telecom Service Providers (TSPs), and Internet Service Providers (ISPs), along with their committed workforce deserves praise for ensuring that India did not face even a single day’s breakdown in telecommunications during the entire lockdown period and thereafter. In fact, the uptime of Base Transceiver Stations was even better during this period. Despite a surge in data consumption in mobiles from about 270 PB per day to 300 PB per day during the lockdown period, our telecommunications systems remained resilient and were able to cope with the increase in demand. The TSPs also significantly contributed to the efforts of the Government to contain the spread of the pandemic. In this regard, the messages conveyed through pre call announcement/ring back tone; TSPs role in facilitating contact tracing; enabling COVID-19 Quarantine Alerts; “COVID Savdhan” with SMSs for target audience in focus areas; and other such interventions are some of the noteworthy contributions by TSPs in
leveraging technology for Public Health. The Telecommunications Sector also facilitated 'work from home' for Other Service Providers. The COVID-19 warriors of our health systems, police authorities and other public servants on duty, policy makers, etc., could not have effectively functioned without the robust and reliable telecom services offered by the telecom ecosystem. It is significant that the Panel Discussion scheduled after the AGM is on the topic ‘Digital Networks - Health and Wealth of the Nation’. Without doubt, this will be an opportune time to take stock of where we stand and what steps are required by us to meet the challenges, specifically in the context of the continuing global pandemic. We should remember that every challenge also brings an opportunity for us to validate and improve our performance.

The mobile revolution is making significant progress in India. However, we also need to enhance Wireline Broadband coverage in the country as also fiberization of towers. We must further bridge the Digital Divide in terms of tele-density, access to broadband, etc. These goals have been subsumed in the National Broadband Mission. It is expected that COAI and the member constituents will play a major role in making this Mission successful. The Government of India, along with State Governments will also work towards easing “Right of Way” requirements.

The National Digital Communication Policy, an excellent document adopted by us, has already defined our roadmap of interventions and policy initiatives. Efforts will continue to be made in this regard. Department of Telecommunications will certainly provide the enabling environment to facilitate innovation, usher in new technologies and promote policies for sustaining the financial and operational health of the sector.

My best wishes to COAI for the success of the forthcoming event and for all their future endeavours.

(Anshu Prakash)
The COVID-19 pandemic has cast a shadow on the global and Indian economy affecting the lives of 1.3 billion Indians. With social distancing the only preventive measure to fight the virus, people are connected virtually and working from home. Normal life is disrupted with schools, offices, industries, transportation and movement of people restricted. Invariably, the mobile phone is the only link which people have to the outside world.

As Doctors and healthcare professionals stand at the forefront of this struggle, the telecom sector, law enforcement agencies, sanitation workers and other essential service providers are keeping the country operational. The ‘telecom warriors’, our staff on the ground, are risking their lives to ensure that people not only remain safely home and connected with family, friends, relatives and the government, but are also able to work from home, and further get seamless access to infotainment on their fingertips. Indeed, during the last few months, the telecom sector has proved once again, that it remains the backbone of the country and the digital economy.

**Critical Infrastructure:**

The lockdown resulted in digitizing the lives of many Indian citizens, with the telecom sector facilitating work from home (WFH), online education, mobile banking, rudimentary telemedicine usage, essential e-commerce and increased access of online gaming and digital entertainment. It caused a shift in traffic from commercial to residential areas with a significant surge in data and voice consumption. Despite the prevalent stress in the sector, telecom companies continued to provide uninterrupted and superior quality of services to over 1 Billion subscribers, maintaining an uptime of 99.99% on network operations.

COAI has played an active role maintaining an ongoing dialogue with Government stakeholders to facilitate the smooth operation of the industry. It collaborated with the DoT in convincing OTT companies like YouTube, Amazon Prime Videos, Netflix and others to reduce the transmission bit rate from High Definition to Standard Definition. This helped bring down the traffic back to more manageable levels.

During the lockdown, operators extended a range of benefits such as free talktime credit and validity extension to ensure millions of the low income 2G prepaid users are able to use the services. Many other activities were initiated in support with the Central, State and Local authorities which allowed employees of the mobile operators to conduct essential services during this lock down period. Our thanks goes out to all those people who braved the lockdown challenges to continue all the field work that was required to keep our network up and running during this time.

The industry has been at the forefront even when there were fibre cuts or when cell towers went down. Working with local municipalities, operators provisioned additional capacity by putting temporary Cell on Wheels (CoWs) in places facing congestion or peak traffic.
Needless to say, all this would not have been possible without the robust 4G networks which now cover over 1 Bn of the Indian population as a result of rapid expansion by operators over the last one year. While driving the Hon'ble PM's Digital India dream, the industry has also, simultaneously, taken care of the interests of 550 Mn 2G feature phone who were kept connected even in the remotest corners of the country.

Enable the Enabler:

Telecom sector contributes 6.5 percent to the country’s GDP and plays an enabling role for other sectors of the economy, helping the Government achieve its economic and social objectives.

It is now time to accord critical infrastructure status to the industry to help India achieve its target of $1 trillion digital economy in the next 2-3 years. The progressive National Digital Communications Policy (NDCP) 2018 shows a clear roadmap for the sector and outlines issues which need redressal so that India’s digital play is at par with global leaders.

Restore Financial Health:

In pursuit of achieving the stated goals of the government, the association has made specific requests to the government to make the sector financially robust. Government is aware of the tremendous financial stress being faced by the sector and is working with telcos towards restoration of the health of the sector. We appreciate the support provided by the Government and TRAI - for instance, the offer to the industry of a two-year moratorium on the deferred payment of spectrum instalments, recent increase in International Termination Charges, etc.

The industry appreciates any move to ease regulatory pressure and cost. We acknowledge the continuous support and guidance received from the TRAI, especially to implement Telecom Commercial Communication Customer Preference Regulations (TCCPR), using the Blockchain solution.

However, these measures are not enough, given the financial burden on the industry, which has exacerbated due to the AGR payments. Other steps are urgently needed.

The operators have paid a heavy amount for the spectrum, and are also paying high Spectrum Usage Charges (SUC), License Fee (LF), USOF and other levies resulting in the sector being overtaxed. There is an immediate need to rationalize the high burden of these Regulatory levies by reducing SUC and Licence Fee to 3% each from the current levels. Prices in India are the cheapest, globally and we hope that the consultation process on Floor pricing, undertaken by TRAI, is completed at the earliest.

Industry’s plea to the Government to refund the unutilized input tax credit needs to be heeded on an immediate basis. Provision of soft loan to companies at MCLR rate, using GST input credit as collateral, should be actioned. Further, the issue of imposing GST levy on regulatory payments, such as LF, SUC and spectrum payment instalments, needs to be addressed by exempting GST on these payments.

Immediate rationalization of the costs on the sector, will ensure sufficient investible funds with operators to expand networks and services. As the sector grows and new services are added, it will further fuel the digital economy, thus ensuring that the government also earns more revenue and is able to achieve its economic targets.
Overcoming Road-blocks:

For smooth rollout and proliferation of services, telecom companies require help not only from the Centre but also the States and local authorities. Securing permission to lay fibre optic cables is a significant hurdle in expanding broadband connectivity in the country and needs immediate resolution. There is a need to push for consistent implementation of Right of Way (RoW) guidelines of 2016, across the length and breadth of the country. States and Municipal corporations need to work together with the industry and allow requisite permissions in a time bound and cost effective manner, to expeditiously set up infrastructure to develop a Digital Highway.

Readying Networks of the Future:

Operators are Readyin' networks of the future’ by deploying 5G technologies, forging partnerships, and developing use cases through 5G trials. New and emerging technologies such as Convergence, Big Data, IoT, AI, AR, Cloud and Robotics are bringing about transformational changes for individuals and enterprises alike. Technology advancements with proliferation of broadband have led to explosive growth of personal data creating opportunities of value creation and socio-economic development.

The planned 5G trials will further help identify India specific use cases and enable partnership models to emerge to actualize the full potential of this technology.

At this juncture when data privacy assumes significance, the Government has tabled the Personal Data Protection Bill 2019 that is currently before a Joint Parliamentary Committee. The industry association had earlier submitted that it will be critical for the Draft Bill to have a balanced approach in ensuring data protection and security, facilitating innovation and also practical provisions on cross border transfer of data. We are hopeful that the same would be considered.

Opportunities Redefined:

The telecom industry for more than two decades, has played a significant role in keeping the country not only connected but also operational, and will continue to drive growth for India's ambition to achieve a $5 trillion economy by 2024.

Some successes from 5G applications are seen in sectors where pilot tests have been conducted like agriculture, health, education. It is a movement towards “inclusion of the masses” and bringing to them the fruits of technology.

It is an irrefutable fact that the telecom industry is facing severe challenges and as an industry, we reiterate our resolve to overcome these challenges and play a constructive role in nation-building. We will continue to work closely with all our stakeholders which include the Government, Regulator and Consumers to make this Digital India dream a reality.

Mr. Ravinder Takkar, Chairman, COAI

Key Highlights

- During the lockdown, telecom companies continued to provide uninterrupted and superior quality of services to over 1 Billion subscribers, maintaining an uptime of 99.99% on network operations.
- The industry appreciates the support provided by the Government and TRAI - for instance, the offer to the industry of a two-year moratorium on the deferred payment of spectrum instalments, recent increase in International Termination Charges, etc.
- The industry appreciates any move to ease regulatory pressure and cost
- Provision of soft loan to companies at MCLR rate, using GST input credit as collateral, should be actioned
- The industry has been at the forefront even when there were fibre cuts or when cell towers went down.
**Humanity** is faced with an unprecedented challenge in the form of the COVID-19 pandemic. As we look for solutions to overcome the pandemic and adjust our lives to the new normal, digital connectivity and platforms have emerged as key enablers. And telecom networks, which are the backbone of these digital platforms, have become even more important.

While the Indian telecom industry has always been a key driver of the nation’s economic growth, the ongoing COVID-19 crisis has brought its contribution to the forefront. The industry, despite its challenges and deep financial distress, has kept a nation of 1.3 billion connected in this difficult hour. Engineers and ground staff of telecom operators have kept the lights on 24x7 while India stayed safe inside their homes. Despite the surge in voice and data traffic, the industry has worked tirelessly to deliver 99% plus network availability in every corner of India. It has made sure everyone can call their loved ones, access the internet, children can attend school virtually and businesses can continue to operate from homes. Even for hundreds of millions of customers at the bottom of the pyramid, the industry has lent a helping hand by extending validity and crediting free talk time.

On behalf of the industry, I must commend the central, state governments and the telecom regulator for supporting and encouraging the industry to accomplish this massive task. We assure them that the industry remains fully committed to keep India connected over one of the biggest digital backbones in the world.

**Big opportunity ahead**

Looking back at the year gone by, one can say that worst may be behind for the industry. The industry structure (3+1 operators) is starting to settle after a painful phase of consolidation and some much needed pricing correction has also taken place.

That does not mean that we are out of the woods. Pricing still needs to move up to allow the industry to be sustainable and be able to invest in newer technologies such as 5G and serve a Digital India.

India is well positioned to advance to 5G and the deployment of the technology will build a vibrant digital ecosystem driven by innovation. The market opportunity for 5G is vast and the potential of 5G in India is multifold.

5G is vital to India’s broader socio-economic aspirations and new job opportunities. 5G can be a catalyst of change, in agriculture, health, education, logistics, financial services etc. as it brings in new age technologies like Artificial Intelligence (AI) and Internet of Things (IoT). 5G will help telecom companies to provide robust connectivity in the deeper pockets of the country. 5G will greatly increase concurrency, decrease latency and improve spectrum efficiency for mission critical communications like medical procedures, online education amongst others.

India however has regulatory, procedural and financial issues to resolve for the successful deployment of 5G alongside the rest of the world. For this, the industry will need the support of the Govt. to ensure that 5G spectrum is available and affordable so that the industry is financially healthy and is able to make the large investments required for 5G, which will require millions of sites.
The Government must make the Indian telecom sector an attractive destination for investors, where investors must get a return on their investments, by rationalising the taxes currently levied on the telecom sector which is currently one of the most taxed sectors in all of Asia. The industry requests support from the government to take steps to make the telecom sector sustainable.

**We can only win as a team**

Healthy partnership is yet another critical element for a healthy industry. Highly inter-networked relationships synchronize the strength of every sector and drives innovation.

Partnerships and an open architecture approach will enable all stakeholders to work better together than isolated initiatives. The industry needs to share and collaborate deeper to win together. A strong ecosystem of equipment providers, application providers, mobile network providers, streaming platform providers with strong partnerships and collaborations will help develop a connected world where telecom and internet touch everyone’s lives.

To conclude, I believe, the first step in the direction is, that the industry should move from a challenging past to a hopefully, remarkable tomorrow. To make the sector healthy, the government must continue to extend its support as well as provide financial relief at the earliest.

On the part of the industry, there should be specific deliverables in line with the government's digital India vision. Last but not the least, I join the stakeholders in extending my appreciation and thanks to the COAI team for taking forward the industry’s agenda and wish them the very best for the year ahead.

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**Key Highlights**

- Despite the surge in voice and data traffic, the industry has worked tirelessly to deliver 99% plus network availability in every corner of India.
- Even for hundreds of millions of customers at the bottom of the pyramid, the industry has lent a helping hand by extending validity and crediting free talk time.
- The industry structure (3+1 operators) is starting to settle after a painful phase of consolidation and some much needed pricing correction has also taken place.
- The market opportunity for 5G is vast and the potential of 5G in India is multifold.
- The Government must make the Indian telecom sector an attractive destination for investors.

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Mr. Ajai Puri,  
Vice Chairman, COAI
As we go through the COVID-19 pandemic, it has become abundantly clear that adaptability is the key to survival. The Telecom Sector, that has had to adapt to many wrenching changes over the past 25 years, found itself challenged with yet another challenge of global proportions! In the current situation of the pandemic, the industry found itself almost as ‘the last man standing’. As the country went into quarantine with restricted movement and new acronyms like WFH slipping into our vocabulary, the resilience and ubiquitous mobile networks came to be the lifeblood of the nation. When even such vaunted services like the Postal Service and Railways, which no one thought would come to a standstill in their lifetimes, came to a grinding halt, the mobile networks continue to function like silent sentinels of the nation’s economic and social health.

Battered by a ruinous price war, unsustainable debt, diminishing profitability, impoverishing government levies and taxes, company bankruptcies and the like, it was a miracle that the mobile networks would be able to withstand the increased traffic loads unleashed suddenly on the networks by the COVID-19 pandemic. But stand and perform they did. Working closely with the Department of Telecommunications (DoT), TRAI, MHA and other government agencies, the Telecom Service Operators (TSPs), ensured customers and citizens alike, that the mobile networks would not fail them in their hour of need.

TSPs along with their OEM partners and supporting vendors began preparations much before the event. Seeing the storm clouds emerge in other parts of the world, Operators began to put into practice their Business Continuity Plans (BCPs). This ensured necessary backup facilities, presence of key employees, redundancy, resilience, contingencies, etc., were all reviewed and put into operational mode immediately. When the intensity of the pandemic increased in India, work place sanitation and hygiene practices were put into effect and finally non-essential employees, accounting for over 80% of the work force, were sent to work from home. When the Honorable Prime Minister issued his first quarantine orders for the nation, the massive movement to WFH, placed unprecedented shifts and loads on the networks. Working with the DoT, Operators quickly pinpointed some of the issues and worked overnight with the DoT to request streaming service companies to reduce their streaming content from High Definition to Standard Definition. With their active cooperation, load factors were brought to manageable proportions. As days progressed, the nation saw a mass exodus of day laborers attempting to return home. To address the needs of these and others, TSPs immediately rolled out free services to ensure connectivity was not disrupted for this vulnerable part of the population.

It is not the strongest of the species that survives, not the most intelligent that survives. It is the one that is the most adaptable to change.
— Charles Darwin
This part of the story would remain incomplete if we did not acknowledge the yeoman service provided by our front line team members tasked with maintaining the uptime of the networks by repairing faults, fiber cuts, moving spare parts and delivering essential items like diesel for the generators. Many literally faced the ire and punishment from local law enforcement personnel during the early days of the quarantine for moving to complete their tasks. Here again, working closely with the DoT, local TERM cell representatives and local law enforcement, these early challenges were quickly resolved. Many of these team members walked miles, carrying heavy loads on their backs to deliver diesel and repair cell towers, because transportation was not available. These are the unsung heroes of our efforts.

While the networks were proving their mettle in the midst of the pandemic, the danger was that we would forget a major milestone in the history of the industry and of COAI. It was 25 years ago that India stepped out into a path of economic liberalization. The Telecom sector was the first to benefit from this visionary call of the government to open the sector to private participation. With the opening up of the sector, the immediate response was one of euphoria. Several companies were given licenses to provide mobile and landline services in the four Metro areas and 21 LSAs. There was hardly an international Operator of repute that was not represented in India. It was during these heady days that COAI was born to represent the interest of the private Operators with the DoT (then the monopoly service provider). Much has transpired in those 25 years. This space would be inadequate to transcribe the full or even a truncated history of these years. Suffice it to say that in the span of 25 years, the TSPs put India at the forefront of global subscriber growth, data consumption, network expansion, technology and process innovation and adoption, among other things. Today, the Telecom sector is serving a huge subscriber base of approx. 1.2 billion with a strong network capacity of over 5,96,000 mobile towers and more than 22 lakh BTSs in the country. All this was possible with an investment of over INR 11.25 lakhs crore by the telecom companies.
STATUS ON POLICY AND REGULATORY ISSUES

Though significant steps have been taken by all the stakeholders to deal with the crisis situation, there are some more pending issues which need immediate attention for the telecom sector to sustain and stay strong in future.

While the telecom industry has been facing severe financial challenges, last year’s monumental judgement by the Hon’ble Supreme Court on Adjusted Gross Revenue has appeared as an additional liability of billions of dollars on the operators in addition to the tremendous debt that has accumulated as a result of extremely high prices of spectrum. The cumulative effect of all this including the high duties and levies imposed on the sector has placed the industry in a precarious financial position.

With onset of COVID-19, there has been a severe disruptive impact on the global supply chain, demand and supply elements and most importantly, on the cash flows of the companies due to the slowing economic activities. This downturn will have an impact on all payments including those of employees, interest, loan repayments and taxes.

In such a situation, the industry is in a dire need of immediate support from the Government. Given the fact that over 30% of all top line revenue goes back to the government by way of levies and taxes, the telecom industry had approached the Ministry of Finance with key requests, including providing soft loans against GST input credit to address the immediate liquidity crunch, reducing the SUC by 3% for all TSPs, reducing Licence Fee (USOF Contribution) from 8% to 3%. The industry had also urged to exempt the levy of GST on License Fees, SUC and Payment of Spectrum acquired in auctions. We have also sought exemption of service tax on amount of LF/SUC payable by telecom operators in compliance with Hon’ble Supreme Court AGR Order. We believe that these measures will not only help the industry emerge from its present financial distress but also place it in a situation to invest in needed network roll outs, coverage, capacity, innovation and new services that benefit the customer and the nation. It will help propel the nation to retain its place as a powerful leading global leader in networks and services as we prepare to take on the challenges of what emerges as new network, business, financial, logistics, economic and social configurations post COVID-19.

The NDCP 2018 (National Digital Communications Policy) is a forward-looking policy which deals with creating new digital reforms comprehensively. Implementation of the policy at a rapid pace will facilitate the ability to raise the proposed investment of USD 100 billion on favorable financial terms, which will not only make access to communication services easy and affordable but will also breathe in a new lease of life into the already debt ridden and financially distressed telecom sector. The proper execution of the policy will not only ensure the sector’s long-term sustainability but will also prepare the sector for widespread adaptations needed for welcoming futuristic technologies. One of the remarkable implementation of NDCP initiative is making the SACFA process paperless through the SARAL SANCHAR portal, which has helped in easing the process and significantly improved efficiency, resulting in faster clearances and transparent working.
The Right of Way Rules, 2016, are certainly a progressive and forward-looking step to achieve the Digital India vision and allows for the uniform growth of telecom infrastructure in all States, as it provides for the process for grant of permissions for the installation of underground and over ground telecom infrastructure, Single Window Clearance via an online portal, the appointment of nodal officers and simplifying documentation. Till date, 16 States have aligned their Telecom Infrastructure policy with RoW Rules, 2016, that have streamlined hassle-free Right of Way processes. 12 states have also developed the online portal for easing RoW permissions. Some of the Telecom Infrastructure Policies like Odisha, Assam, Himachal Pradesh, Tamil Nadu Govt. Order, etc. are very progressive and help in an exponential growth of Telecom Infrastructure across the state. The industry along with the Government should now focus on this development across the entire country.

Fiberization is a must to address the digital divide and to reach all parts of the country to empower the citizens. Since all the cell towers in the country at present are not connected through fiber due to its paucity, there is an issue. Moreover, in last four years we have not had any increase in backhaul spectrum, hence, we are dealing with constrained factors and have to manage the quality of services based on existing capacity, for everybody’s good. Growth of fibre is the foremost priority for the ongoing exponential increase in data demand and improved quality of services. Fiberization will surely meet the present requirement of bandwidth and future technologies such as 5G, emerging technologies etc. Apart from this, early allocation of E & V bands to meet the backhaul requirements is also a pending request of the industry which is being considered by the Government.

Last year, 5G became a mainstream topic and rebooted the discussion of the value that telecom brings to society including innovation, security, and inclusion. World Radio Conference 2019 was held from October 28, 2019 to November 22, 2019 in Sharm-el-Shaikh, Egypt. The outcome of the WRC-19 has been very pragmatic, especially in the identification of mmwave bands (>24GHz) for IMT/5G. This identification and the resolutions have enabled efficient use of this spectrum between multiple services for national usage. The Indian Government and industry also actively participated in the same and are discussing 5G spectrum pricing, test cases, test beds and adoption of use cases suitable to India in the coming year. The stakeholders have submitted their test applications to DoT to begin the 5G testing, which due to the pandemic is on hold for some time, but is expected to begin shortly.
There was some misinformation regarding the emission levels of 5G technologies floating around for some time. However, the latest update from ICNIRP published in March 2020 reiterated that the safety guidelines retain a high level of protection with limits set well below the thresholds for established hazards for all radio frequencies from 2G to 5G. ICNIRP noted that the exposures from 5G networks are well below these thresholds and stated – “The most important thing for people to remember is that 5G technologies will not be able to cause harm when these new guidelines are adhered to.” This is based on scientific reports prepared for the World Health Organisation (WHO), the European Commission, national expert groups and continuous monitoring of new research. The process has taken seven years and there was a public consultation in 2018 with more than 1,000 comments from over 120 organisations.

We must now expect that the coming years will usher in possible disruptions, hitherto unconceivable. Technology innovations, new revenue streams, new applications, new network configurations, new competitors, will all require significant investments to propel India to newer heights of economic growth and prosperity. With progress in Artificial Intelligence, Machine Learning and intense interest in smart technologies, IoT and Robotics are also coming into the mainstream. Enterprise as a major revenue stream will also provide fresh opportunities for TSPs. This will bring many opportunities for operators in the form of AI based solutions for applications, services and underlying infrastructure. This may also be adopted to support the new digital infrastructure, improve customer service and reduce customer churn.

COAI and its Members and Associate Members will continue their focus on building the new age digital infrastructure to support the nation and providing value to their customers, advocating for a stable, long term, sustainable, policy and regulatory environment which will promote innovation and orderly growth for a fully connected and digitally empowered India delivered through a financially strong and viable industry. We also look forward to continuing our partnership with the Government and Regulator to achieve the above vision.

OTHER ACTIVITIES OF THE ASSOCIATION

Taking forward the momentum from last year, COAI organized the third edition of the country’s largest iconic Mobile, Internet, and Technology event in India and South Asia’s biggest technology event – India Mobile Congress 2019. The event took place under the active support, guidance, and leadership of Shri Ravi Shankar Prasad, Hon’ble Minister of Communications, Law and Justice and Electronics and Information Technology and actively supported by Shri Anshu Prakash, Secretary, DoT and Chairperson of the Digital Communication Commission as well as with the support of several other Government Ministries. With more than 250 plus speakers, discussions pivoting on 5G, Intelligent Edge, Immersive World, Privacy & Ethics, Autonomous things, Smart spaces, Augmented Analytics, Health & Future Logistics, the event drew luminaries from industry, Government – both domestic and international as well as many speakers of international repute. The event also witnessed technology showcases, use cases and also provided a platform for budding entrepreneurs to gain exposure and build connections with special focus on start-up pavilion.

COAI has participated and partnered with other entities in the co-organization and co-creation of various Seminars and Workshops on issues of common interest and benefit to its members and for generating subject matter awareness amongst consumers. COAI and its members also continued active participation in Organizations such as CII, FICCI, ASSOCHAM, NASSCOM, GSMA, TSDSI, TCOE, TSSC, amongst others, as well as activities of many telecom events in India. To keep pace with the current situation of the
Covd-19 pandemic and following the social distancing norms, COAI organized various webinars to discuss the changing world of telecom during these critical times.

The COAI Executive Council headed by Chairmen, Mr. Balesh Sharma, Mr. Ravinder Takkar, Vice Chairman, Mr. Ajai Puri and comprising senior representatives from all member operators, met several times over the last year to deliberate on a variety of issues impacting the telecom industry. They were ably assisted by proficient advice from the various Working Committees that have been set up in COAI.

I also want to express my deep appreciation for all the Committees and Working Groups and their Chairmen and Vice Chairmen for their unstinted support and cooperation. We are grateful to you all for taking time out of your busy schedules to contribute towards various industry issues and helping the Association in representing them in a proficient and timely manner.

I would like to thank our Chairmen, Mr. Balesh Sharma, Mr. Ravinder Takkar and the Vice Chairman, Mr. Ajai Puri, for their personal involvement and support in all the activities and initiatives of the Association for the last year, especially in the face of the many challenges faced by their respective companies and the entire industry during the year. Both of them have given generously of their time and resources to provide personal support and guidance for the Association. We request their continued support and guidance in future as well.

I would especially like to record my deep appreciation for the sustained efforts and support of the COAI Secretariat team who have always been fully committed to the task before us and have always been ready to take up new challenges for the Association and execute them smoothly, efficiently and with excellence. We witnessed great team working during the COVID-19 lockdown. I deeply appreciate all of their efforts in contributing significantly to all the achievements of COAI.

Mr. Rajan S. Mathews
Director General, COAI

Key Highlights

- Seeing the COVID-19 emerge in other parts of the world, Operators began to put into practice their Business Continuity Plans (BCPs).
- TSPs immediately rolled out free services to ensure connectivity was not disrupted for this vulnerable part of the population.
- While the industry has been facing severe financial challenges, judgement by the Hon'ble Supreme Court on AGR has appeared as an additional liability of billions of dollars on the operators.
- Over 30% of all top line revenue goes back to the government by way of levies and taxes
- The telecom industry had approached the Ministry of Finance with requests, including soft loans against GST input credit to address the immediate liquidity crunch, reducing the SUC by 3% for all TSPs, reducing Licence Fee (USOF Contribution) from 8% to 3%.
- Fiberization is a must to address the digital divide and to reach all parts of the country as it will meet the present requirement of bandwidth and future technologies such as 5G, emerging technologies etc.
The rapid adoption of the mobile phone, internet, social media platforms and expansion of digital payments have empowered hundreds of millions of Indians. This has been due to numerous initiatives by the Government and the industry to bridge the digital (and socio-economic) divide. The success of such initiatives hinged on the availability of telecommunications infrastructure. At a time when every other service was impacted, telecom responded comprehensively to the challenges on all fronts. Over the past two months, as most people were working from home due to the COVID-19 threat, it was the strength of the telecom network that kept the people and India going. The data services – video calling, e-education for children, binge-watching web series – ensured that people at home could work, play or study on the strength of high bandwidth connectivity. The voice network ensured migrants in cities could stay connected with their families in the villages.

The Telecom industry has demonstrated that it has the resilience required to keep the nation connected, amidst a crisis. The sector have given a new meaning to telecom being the ‘lifeline of the country’ by ensuring that everyone remains connected in this hour of need and that we can stay on course for the Industrial Revolution 4.0.

Connectivity to enable Work From Home

As the first phase of the lockdown started data usage shot up by 25%. Home Broadband customers were upgrading to faster speeds and larger data plans to support their work from home requirements. Online classes, watching video content and being updated with the latest news, helped people keep up with their daily routines. B2B customers were utilizing 4G dongles, home fibre connections and larger enterprise bandwidths. From an average monthly wireless data consumption of 6900 PB at the quarter, ending December 2019, consumption increased to about 8280 PB as on April 2020.

The Telecom industry responded quickly to successfully address the surge in demand for data and voice. It ensured citizens were able to work from home (WFH). Telecom companies worked 24*7 to ensure networks remained available 99.99 per cent of the time. Out of a total 22 lakh BTSs in the country, we had 800 nonfunctional BTS, but by the time of lockdown these were brought down to just 290. Cells on Wheels were deployed, wherever permitted and severed fibre optic cables cases were brought down from an average of 100 per day to just seven. The movement of vehicles with diesel were facilitated to ensure DG Sets could run without power breakdown.
Telecom companies also urged internet consumers to use data responsibly to ensure critical services could run smoothly. Over-the-top (OTT) platforms like Netflix, Prime Videos and others were requested to reduce the streaming quality from high definition to standard definition, and they complied. We also urged the Government to consider self-digital-KYC for new SIM card connections and approached the state and local administration for opening retail recharge points. Meanwhile, TSPs incentivized users to recharge for other subscribers. Other channels like ATMs, medical stores, grocery stores, etc. have also been activated as recharge points. Over the last few weeks, TSPs have delivered several initiatives, including new capabilities of SIM delivery to home, doorstep KYC, "Work from Home" solutions, conferencing and security services. All the above measures have received numerous compliments, and consumers are generally happy about the network and appreciative of how TSPs have stepped up the quality and experience during the COVID-19 crisis.

TSPs continue to monitor the developments closely and introduce adequate measures to address them.

**Telecom Warriors - The Unsung Heroes**

The health of our networks were maintained to a large extent by the 'Telecom Warriors,' the staff on the ground who braved the pandemic and initial communication gap between the senior and executing law enforcers to ensure secure and uninterrupted connectivity. Which, in turn, helped, the warriors in white coats. Primary and secondary health care centres including the health and wellness centres in affected areas were linked with a Telemedicine Hub via telephone/video call to facilitate consultation between the patient and the provider, which was guided by Ministry of Health and Family Welfare Telemedicine Guidelines. At a time when doctors in hospitals were busy treating patients while covered in layers of protective clothing, other doctors could keep track of their patients with minor ailments by tele-consultation. Till quite recently, these were just terms, but in the space of a month they became a reality for thousands of Indians. All this happened thanks to a network with high bandwidth that has been built over the years.

**Reducing stress and enriching relations**

By being connected to a high-speed broadband network, millions were able to reduce the stress of being cooped up at home for days on end by getting access to a variety of entertainment options, news and health developments across the world.

In a situation, where people got stuck at different locations, telecom provided not just voice but video connectivity also. It led many staying alone to pick their phone book or contacts and call them, just to enquire about their wellbeing. The use of telephone and apps using the telecom network has created a circle of togetherness which according to psychologists is critical in a period of isolation.

**Creating New, Meaningful Experiences**

The opportunities that the telecom network created are immense and unending. Being at home also meant also opened up new experiences in the two months of lockdown. This includes getting married while in different cities; having birthdays when relatives and friends from across the world join in and learning new skills. The list could range from taking online lessons on Coursera to simply cooking that new dish after seeing a YouTube video. Add to that connecting with neighbours, learning painting, dancing or practicing yoga. Even ordering medicines from the neighbourhood chemist by placing an order on WhatsApp.

Online gaming has also gained significant traction during the lockdown as a preferred leisure activity, connecting family and friends. Smartphones empowered gaming, riding on the increased mobile penetration, robust internet connectivity, low data costs and the improvement in the quality of games on offer.

**Financial concerns: Enhancing the Wealth of the Nation**

Given the ever-increasing demand for data and services, the Government must address the issue of financial distress of the sector and provide immediate and timely relief, so that telcos can make necessary investments to strengthen the networks further to meet the increasing demands of the consumers.
The financial crisis, however, has not dampened the resolve of the industry to build a world class telecom infrastructure in India and function as a vibrant, essential component of the nation's economic and communications health and well-being. The contribution of telecom to the country's annual GDP is around 6.5 per cent and expected to go up to 8 per cent, as per GSMA. The GSMA's recent annual 'State of the Industry Report on Mobile Money' presents a lucid data backed explanation of how the growing mobile telephony landscape has led to greater financial inclusion and impact on lives, economies and innovation, especially in emerging markets. In India, mobile money has ensured more women are using financial services, low-income households are accessing essential utility services and small land holding or marginal farmers are getting paid more quickly and conveniently, eliminating the middlemen.

We are thankful to the Government for the various policy initiatives towards helping achieve Digital India targets. The National Digital Communications Policy, 2018, seeks to unlock the transformative power of digital communications networks in order to achieve the goal of digital empowerment and improved well-being of the people of India.

**Future: The Network for Health and Wealth-Building a New India**

Our Hon'ble Prime Minister Shri Narendra Modi's vision of Digital India and his stress on 'Jaan hai tho Jahan Hai' is a guidance for the telecom industry. The sector responded to this clarion call of the Hon'ble Prime Minister and is helping to ensure that the physical and mental health of billions of Indians is protected during the ongoing pandemic. The industry firmly understands the old proverb and an appropriate one for all of us today—'Health is Wealth' and it applies to the nation as well. WFH, online education and sundry online activities, including limited e-commerce activities, have not only helped in maintaining the well-being of the people of the country but have also ensured that some form of economic activity is maintained with the sector enabling 30-35% of the GDP during the period. Banking services and limited BPO/KPO (that were allowed to open up) and content and consultancy services were able to perform activities through a healthy network maintained by the telecom warriors.

Going forward, AI-linked technologies such as smart transport and traffic management, smart manufacturing, smart agriculture, smart healthcare, autonomous vehicles, drones and telemedicine or remote consultation between doctors and specialists will be the building blocks of a sustainable future.

**Conclusion**

Telecom operators have played a vital role in ensuring that rural India surpasses urban India in internet penetration. Now, there are no happy hours on mobile internet; every hour is a peak hour. The telecom sector is working to transform the country into a digitally empowered society and knowledge economy even when the pandemic threatens to cripple the global economy and social infrastructure.
COVID-19

I. VPN Usage Growth during COVID-19 Crisis

Source: ExpressVPN,
* Derived from aggregate sum of data transferred

Key Observation:
15% growth in India on VPN usage during COVID-19

II. Change in Internet Speed for Fixed Services

Source: OOKLA
Note: Comparison March 2 with June 08, 2020 Speeds
III. Change in Internet Speed for Mobile Services

Source: OOKLA
Note: Comparison March 2 with June 08, 2020 speeds

IV. India Internet Performance

Source: OOKLA, Speed Test
VI. Net Change in expected media Consumption among Indians in the two weeks following March 30, 2020

- Reading books or magazines: 3%
- Playing Video Games: 11%
- Chatting, texting: 48%
- Engaging in Social Media: 48%
- Watching Linear TV: 48%
- Watching TV Shows or movies: 57%
- Watching online Videos: 60%

Source: McKinsey & Company, Statista
Note: Survey of 582 Indians March 23-30, 2020

V. Estimated Impact on Global Tech Industry Shipments in Q1 2020

<table>
<thead>
<tr>
<th>Product</th>
<th>Estimated Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>TVs</td>
<td>-4.50%</td>
</tr>
<tr>
<td>Video Game Console</td>
<td>-10.10%</td>
</tr>
<tr>
<td>Smart Phones</td>
<td>-10.40%</td>
</tr>
<tr>
<td>Smart Speakers</td>
<td>-12.10%</td>
</tr>
<tr>
<td>Note Books</td>
<td>-12.30%</td>
</tr>
<tr>
<td>Smart Watches</td>
<td>-16%</td>
</tr>
</tbody>
</table>

Source: TrendForce, Statista
Note: Smart Phone forecast refers to production volume instead of shipments
VII. Most downloaded apps in India from March 26 to April 1, 2020 (in million downloads)

<table>
<thead>
<tr>
<th>App</th>
<th>Downloads</th>
</tr>
</thead>
<tbody>
<tr>
<td>Google Pay</td>
<td>2.0</td>
</tr>
<tr>
<td>Aajtak Live TV News</td>
<td>2.4</td>
</tr>
<tr>
<td>Uvideo</td>
<td>2.5</td>
</tr>
<tr>
<td>WhatsApp*</td>
<td>2.6</td>
</tr>
<tr>
<td>Carrom Pool</td>
<td>2.7</td>
</tr>
<tr>
<td>Zoom</td>
<td>3.8</td>
</tr>
<tr>
<td>TikTok</td>
<td>4.0</td>
</tr>
<tr>
<td>Ludo King</td>
<td>5.6</td>
</tr>
</tbody>
</table>

Source: priori Data, Statista
Note: Apple and Android store* and related
Indian Telecom Industry - An Overview

I. Telecom Industry – Contribution to India

- Lowest voice & data rates in the world (ARPU Rs. 74)
  Source: TRAI PIR

- Over 500,000 villages covered
  Source: DoT, PQ

- Contributes 6.5% to India’s GDP
  Source: GSMA

- Among the highest contributors to Govt.:
  nearly INR 58,000 crores pa
  Source: TRAI, COAI estimates

- 2nd largest private sector investment in infrastructure
  – INR 11.24 Lakh crores
  Source: DoT, PQ, COAI Estimates

- Investment in Spectrum Auctions since 2010:
  INR 3,68,000 crores
  Source: DoT/WPC

- Among Highest contributors in FDI in last two decades INR 218,047 crores
  Source: DIPP

- Contributes directly to 2.2 Mn employment and indirectly to 1.8 Mn jobs
  Source: GSMA

Note: 1) TRAI Excludes the IUC and Roaming Settlement Charges while calculating the ARPU.
2) Contribution to Government includes L.F, SUC and GST.
II. Key Statistics of the Wireless Industry in India

Key Observation:
26.4% increase in total subscribers between Dec 2011 & Dec 2019 with CAGR of 3%. While the wireless subscribers increased by 29% between Dec 2011 & Dec 2019, with CAGR of 3.2%.

Source: TRAI Subscription Data
Note: * TRAI Excludes the IUC and Roaming Settlement Charges while calculating the ARPU

III. Industry Subscriber Figures

A. PAN India Total and Wireless Subscribers

Source: TRAI Subscription Data
Note: All the data is as of December 31st, as per TRAI Reports
B. PAN India Total and Wireless Subscribers - Annual Net Additions

Source: TRAI Subscription Data
Note: Subscriber Figures are as of December 31st, as per TRAI Reports

C. Wireless Rural & Urban Subscribers as % of Total Wireless Subscribers

Source: TRAI Subscription Data
Note: Subscriber Figures are as of December 31st, as per TRAI Reports

Key Observation:
10% points increase in the share of Wireless Rural Subscribers from December 2011 to December 2019.
D. Data Subscribers as % of Total Subscribers

Source: Operators quarterly results, TRAI PIR
Note: Data subscriber figure includes figures of Airtel, Rjio and VIL.

Key Observation:
The share of the data subscribers increased from 17% of the total subscribers in Q2FY18 to 52% in Q2FY20. There is around 200% increase in the Data Subscribers between Q2FY18 to Q2FY20.

E. Subscriber Market Share of Wireless Operators Dec 2019

Source: TRAI Subscription data

Key Observation:
Private Operators hold approx. 90% of the market share in terms of Subscribers.
F. PAN India Total and Wireless Internet Subscribers

Source: TRAI
Note: 1) For 2013 to 2018 the data is as on 31st December as per TRAI report. TRAI is yet to publish data for Dec 2019.
2) * As of Sept 2019.

Key Observation:
More than 200% increase in the wireless internet subscribers between December 2013 to December 2019 with a CAGR of around 20% between this period.

G. Mobile Broadband Subscribers

Source: TRAI Subscription data
Note: All the data is as of December 31st, as per TRAI Reports

Key Observation:
More than 1500% increase in mobile broadband subscribers between December 2013 to December 2019 with CAGR of 59% between this period.
H. Composition of Internet Subscribers - Sep 2019

Source: TRAI PIR

IV. Wireless Tele-Density

Source: TRAI Subscription data
Note: All the data is as of December 31st, as per TRAI Reports

Key Observation:
The Rural Tele-Density increased by almost by 20 basis point from December 2011 to December 2019.
V. Revenue and Usage Parameters

A. Monthly Average Revenue Per User (ARPU) – Wireless Services

Key Observation:
The monthly ARPU has declined from INR 123 in 2015 to INR 74 in September 2019. This is decline of almost 40%. However, there has been slight increase in the ARPU in 2019 compared to 2018, which was at INR 70.

B. Minutes of Usage (MOU) per subscriber per month - Wireless Service

Key Observation:
Significant increase of almost 98% in the MOU per Subs per month from 2016 to April 2020.
C. Total Outgoing MoU for Internet Telephony

Source: TRAI PIR, COAI Estimates
Note: 1) For 2011 to 2018 the data is as on 31st December as per TRAI report. TRAI is yet to publish data for Dec 2019.
2) * As of Sept 2019.

VI. Telecom Financial Data

A. Industry Adjusted Gross Revenue

Source: TRAI PIR and COAI Analysis
Note: * COAI estimates

Key Observation:
Industry AGR decreased by almost 17% between FY 17 to FY 20. However, it is estimated that there will be slight growth in the AGR in FY 20 as compared to FY 19.
B. Industry EBITDA & EBITDA Margin

Key Observation:
Industry EBITDA decreased by almost 37% between FY16 and FY 20. However, it is estimated that there will be growth in the EBITDA in FY 20 as compared to FY19. EBITDA margin also decreased from 25% to 22% between FY 16 to FY 20.

C. Total Regulatory Levy - License Fee + SUC

Source: TRAI Financial Report
Note: The figures are for the Access Service Only

Key Observation:
Fall in revenue resulted in a decline in contribution to the exchequer since Q3FY 16. However, there has been slight increase in the L.F + SUC contribution in Q3 FY 20 as compared to Q2 FY 20.
D. ARPU as % of Per Capita Income

**Key Observation:**
ARPUs as % of Per Capita Income were 0.69% in FY19. Even if we consider the increase in the Tariffs by all the TSPs in FY 20 by 30%, the ARPU as % of per Capita income will just be 0.86%. Thus, Telecom services still will be very affordable for the user in India.

### VII. Data Usage of Mobile Subscribers

#### A. Wireless Data Usage per Subscriber per Month

**Note:** 1) For 2014 to 2018 the data is as on 31st December as per TRAI report. TRAI is yet to publish data for Dec 2019. 2) * As of Sept 2019. 3) April 2020 data is estimated

**Key Observation:**
Wireless Data Usage per subscriber per month has increased by almost 13 times since 2016.
B. Wireless Data Usage per Month

Key Observation:
Total Wireless Data Usage per month has increased by almost 7 times since 2016.

C. Average Outgo per GB per Quarter

Key Observation:
There has been 67% decrease in the average Outgo per GB between Q2 FY 18 and Q2 FY 20. This shows that the per GB cost for the user has decreased significantly since Q2 FY 18.
D. Data Traffic in Circles

Key Observation:
4G payload is much higher than the 3G Payload in all the Circles.

VIII. Smartphone Devices in India

A. 4G Capable Unique Devices

Key Observation:
Approx. 50% increase in 4G capable unique devices from 2018 to 2019.
B. 3G/4G Capable Device Penetration in India

**Key Observation:**
78% penetration in Metros of 4G capable devices. Also, 3G enabled devices are still more than the 4G enabled devices in all the Circles.

IX. Telecom Infrastructure

A. Number of Base Transceiver Stations (BTS) and Sites

**Source:** Tarang Sanchar

**Key Observation:**
52% increase in the number of BTSs from March 2017 to March 2020
B. Number of Base Transceiver Stations (BTS) in each Circle

**Key Observation:**
Maharashtra has the highest number of BTSs followed by Tamil Nadu and Andhra Pradesh.

C. Number of Wireless Subscribers per BTS in each Circle

**Key Observation:**
In Bihar there are around 649 wireless Subscribers per BTS, which is the highest in the country, while in J&K it is estimated that one BTS caters to around 308 wireless subscribers.
Telecom circles with the Highest Number of Base Transceiver Stations

- **Maharashtra**: >186296
- **Tamil Nadu**: >173569
- **Andhra Pradesh**: >167926

Source: Tarang Sanchar
International Trends
(Asia Pacific Region)

**Subscriber Base:**
India has the second largest subscriber base in the world, second only to China. India has approx. 15% of total subscribers of the world.

**Internet Usage:**
Indians spend 3.23 hours on internet per day using mobile devices (handset) in comparison to the world average.

**Global Mobile Traffic:**
India contributes highest in the Global Mobile Data Traffic per smartphone at 14.5 GB per smartphone per month.

**Price per GB Data Traffic:**
India has the most affordable data service at 0.26 USD per GB Data.

**Share of Prepaid Connections:**
India's prepaid share is one of the highest in the world at 96% with the world average being 73%.
A. Mobile Subscription

Key Observation:
India has around 15% of the total world mobile subscribers.

B. Subscription Penetration

Key Observation:
There is a headroom for growth as India's penetration is 87%.
C. Share of Prepaid Connections

Source: Hootsuite Report, January 2020, TRAI PMR, September 2019

**Key Observation:**
India's prepaid share is one of the highest in the world at 96% with the world average being 73%.

D. Mobile Broadband Connectivity

Source: Hootsuite Report, January 2020

**Key Observation:**
Mobile Broadband Penetration of India is 52% and there is significant headroom for growth.
E. Global Mobile Data Usage (in GB per Subscriber per Month)

![Bar Chart]

Source: GSMA Mobile Economy 2020

F. Time Spent in hours per day on internet using Mobile Internet

![Bar Chart]

Source: HootSuite Report January 2020
G. Mobile Payment Services Penetration

Source: HootSuite Report 2020. The graph shows % of internet users who use their phones to pay for goods or services each month (survey based).

Key Observation:
There is a vital scope of further rise in mobile payment services. The Mobile payment users as percentage of total internet user is 31% in India.

H. Mobile Banking and Financial Services Penetration

Source: HootSuite Report 2020. The graph shows % of internet users who use their phones to pay for goods or services each month (survey based).

Key Observation:
29% Indian Internet Users have adopted mobile banking and financial services, much lower than countries like Brazil, Thailand and World average.
I. Global Mobile Data Traffic per Smart Phone (in GB per Month)

Key Observation:
India contributes highest in Global mobile data traffic per smart phone; 14.5 GB per smart phone per month.

J. Price per GB Data Traffic (in USD)

Key Observation:
India has the lowest price per GB in the world.
**Key Observation:**

India has one of the lowest data price per GB as % GNI per Capita PPP. In the figure above the Prices per GB are expressed as a percentage of GNI per capita to show data price relative to the size of the economy of each country, thus pointing to the affordability of data tariffs in each country. India is one of the most affordable country in the world in terms of data tariffs.

*Source: Cable.co.uk, World Bank, COAI estimates*
**Significant Achievements for the Year 2019-2020**

1. **Moratorium granted by DoT for the Payment of the Spectrum dues:**
   
a. COAI in its various representations to DoT requested for a moratorium for the payment of the spectrum acquired through various auctions. In this regard, DoT after the cabinet decision agreed to provide the two-Year Moratorium i.e. for FY 21 & FY 22 to the Industry for the deferred payment for the spectrum acquired through auction.

b. It is estimated that this decision of DoT provided the cash flow benefit of **around INR 42,000 Crores to the Industry.**

2. **Government's support on some of the submissions made by COAI in wake of COVID-19 outbreak:**

In the situation of the outbreak of the COVID-19 in the country, there was need to ensure the availability and continuity of our telecom operations. To run 24*7 as an essential service, COAI made various representations to DoT/TRAI and other Government agencies for the support to run the network operations smoothly, in the lockdown situation. The key requests of COAI agreed by various Government agencies are as below:

a. Secretary DoT has referred the matter to Member-Finance for his recommendation and action:
   - Providing low cost funding
   - Reduction in Regulatory levies (LF& SUC)
   - Exempt GST on Govt. levies
   - Exempt service tax on LF/SUC payable by Telecom Operators in compliance with Hon’ble Supreme Court order

b. DoT agreed to look into the issue of conversion from pre-paid to post-paid connections and vice-versa without disconnection of the number.

c. DoT provided the relaxation till April 30, 2020 on Postponement of Monthly and Quarterly CAF audits considering COVID-19 Outbreak.

d. On the request of COAI that streaming platforms to undertake technical measures such as moving from HD to SD streaming to ease the pressure on infrastructure, DoT agreed to take up the issue with the platform providers and they have reduced the streaming from HD to SD.

e. DoT issued letter to Chief Secretaries of all States/UTs to designate Nodal officers to be contacted by companies in case of issues pertaining to Exemption of Warehouses & Network Operation Centers (NOC) etc. for Telecom & IT Industry from Prohibitory Orders of State Government & Local Authorities.

f. DoT has extended due date for submission of EMF self-certificates to 30 days from 15 days.

g. Ministry of Home affairs has issued a notification that for all foreigners in India, the VISA has been extended till 30th April. DoT vide e-mail dated April 4, 2020 has allowed extension of validity of such connections till the extension of Visa.

h. Ministry of Finance accepted the request of COAI that TDS certificate issued in FY 20 for lower deduction of tax should be automatically extended till June 2020.

i. TRAI vide its letter dated March 29, 2020 agreed with COAI request and has granted a relaxation of six weeks from the respective due dates in respect of all monthly and quarterly reports for the period ending March 31, 2020.

j. Directions issued by DCP to all local police officials to allow unrestricted movement of employees of Telecom Service providers to ensure the operational continuity of telecom services.

k. On the request of COAI, some of the Municipal Bodies de-sealed the towers to ensure the operational continuity of telecom services.
3. DoT Guidelines on “Approach towards the sustainable Communication”:

a. COAI in its various representation to DoT & TRAI on the issue of “Approach towards Sustainable Telecommunications” (Green Telecom) had made following submission:
   • There should be only one target i.e. carbon abatement
   • There should not be any target for RET deployment

b. Considering the submissions of COAI and after the TRAI's Recommendations on the issue, DoT issued its new guidelines on May 15, 2019 agreeing to the Industry request for voluntary adoption of the RET solution by the TSPs.

c. It is estimated that these guidelines have saved around INR 66,000 Crores of the Industry.

4. TRAI Consultation on Floor price:

a. COAI vide its letter RSM/COAI/2019/205 dated November 15, 2019 and RSM/COAI/2019/210 dated December 03, 2019, requested TRAI to fix floor tariffs (minimum tariff) for data services.

b. Based on the request made by COAI, TRAI on December 17, 2019, initiated the consultation paper on Tariff issues for telecom Services i.e. on Floor Tariffs.

5. Implementation of Telecom Commercial Communications Customer Preference Regulations, 2018:

a. COAI has made various submissions to TRAI on the issue of implementation of TCCCPR, 2018 and TRAI's direction dated 20.01.2020. TRAI has considered the submissions of COAI and has been considerable towards the issues being faced by the TSPs while implementing the DLT solution.

b. COAI has engaged with the TRAI on the issue of the formats to submit the Performance Monitoring Reports and the submissions have been favourably considered by TRAI. TRAI, based on the submission, has simplified the PMR formats and have reduced the number of reports substantially.

c. COAI has also published the advertisement on behalf of its member TSPs to ensure the compliance to the TRAI's direction to run the advertisement campaign regarding the provisions of the regulations and the said Direction. This has helped the member TSPs to save the cost of running the advertisement campaign individually.

d. COAI has also been instrumental to ensure that other associations are duly notified regarding the requirements their member entities are required to fulfil so that the provisions of the TCCCPR, 2018 gets implemented at the earliest.

6. M2M Communication Guidelines:

a. COAI has made submissions to DoT on the issue of M2M services. DoT has considered the submissions of COAI and issued instructions on M2M services and the KYC of M2M subscribers on May 16, 2018.

b. Thereafter, COAI has engaged with the DoT to discuss the provisions of the said instructions and the timeline to implement the same. Various submissions have been made to DoT to extend the implementation timeline and COAI was successful to get the extensions required for implementation till December 31, 2019.

c. Based on the request from members, COAI submitted a letter on 24.01.2020, requesting the following:
   • Six months extension for implementing the M2M KYC guidelines for all M2M SIMs.
   • DoT should create a mechanism to allow certain enterprise more than four URLs/IP Addresses for a particular use case. DoT can open a separate cell looking into the demands of the enterprise.
   • Explore the possibility of making the M2M guidelines issued by DoT on 16.05.2018 applicable only for those M2M connections which were provided after 16.05.2018.

d. DoT has agreed to allow more than 4 URLs/Public IP for various use cases in case TSPs come up with a common solution which ensures that there is no security breach.
7. World Radio Communication Conference 2019:

WRC 2019 was held from October 28, 2019 to November 22, 2019 in Sharm-el-Shaikh, Egypt. The outcome of the WRC-19 has been very pragmatic, especially in the identification of mmwave bands (>24 GHz) for IMT. This identification and the resolutions have enabled efficient use of this spectrum between multiple services (including satellite for national usage). Even commercial deployments have started in some of these new IMT bands:

<table>
<thead>
<tr>
<th>Band (GHz)</th>
<th>Amount (GHz)</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>24.25 – 27.5</td>
<td>3.25</td>
<td>Globally Harmonized</td>
</tr>
<tr>
<td>37 – 43.5</td>
<td>6.5</td>
<td>Globally Harmonized</td>
</tr>
<tr>
<td>47.2 – 48.2</td>
<td>1</td>
<td>Region 2 and 65+ (incl. India)</td>
</tr>
<tr>
<td>66 – 71</td>
<td>5</td>
<td>Globally Harmonized</td>
</tr>
</tbody>
</table>

COAI has further requested DoT to review National Frequency Allocation Plan (NFAP) with the outcomes of the World Radio communication Conference 2019 and formation of National Study Groups for preparation to contribute to ITU-R SG5.

8. TRAI Consultation Paper on Allotment of Spectrum to Indian Railways for Public Safety and Security Services issued on June 24, 2019:

Following were the key submissions made by COAI on the Consultation Paper:

a. 700 MHz band is extensively used for commercial mobile services globally and a comprehensive eco-system is available for this band. Many countries are also carrying out 5G trials in this band.

b. In India, 700 MHz band has already been identified for IMT. Given the importance of this band, it has also been identified as one of the key bands for deployment of 5G in India by the 5G High Level Forum constituted by DoT.

c. It is important to understand that in India, out of 45 MHz (paired) of 700 MHz band, 10 MHz (paired) has already been assigned to MoD. This leaves only 35 MHz (paired) amongst four TSPs. In case any new TSP plans for 5G in this band in India, then 35 MHz (paired) is grossly inadequate. Thus, it would not be appropriate to fragment the band any further.

d. COAI strongly recommended that no spectrum from 700 MHz band which has for long been identified for IMT in India should be given to railways for any kind of services.

The Authority recommended in October 2019 that out of the 35 MHz (paired) spectrum available in 700 MHz band, 5 MHz (paired) spectrum may be allocated to Indian Railways for implementing ETCS Level-2, MC PTT + Voice, IoT based asset monitoring services, passenger information display system and live feed of Video Surveillance of few coaches at a time. The remaining 30 MHz (paired) in 700 MHz band may be put to auction in the forthcoming auction. Spectrum may be assigned to Indian Railways on administrative basis for captive use only and not to offer any commercial services such as Wi-Fi onboard.

9. EMF Biennial Certificate Submission:

a. COAI had highlighted to DoT that online Biennial Self-Certificate generation and submission using the Tarang Sanchar Portal for the current biennial cycle can begin only when all the modifications to be done in the portal basis Revised Test Procedure and implementation of signage on field are completed, in order to generate Self-Certificates complying with the new test procedure requirements. Basis submissions made by COAI. DoT granted the extension of timeline for current EMF certification biennial cycle (March 31, 2019) by one year i.e. March 31, 2020 vide DoT’s notification of File No. 800-15/2010-VAS dated January 31, 2019. The EMF Biennial Certificate Submission of more than 12.5 lakh Certificates for this cycle has been completed.
10. **5GIF Evaluation Report:**

The 5G India Forum (5GIF) has been established under the aegis of COAI, aiming to become the leading force in the development of next generation communications and will enable synergizing national efforts and will play a significant role in shaping the strategic, commercial and regulatory development of the 5G ecosystem in India.

The 5GIF IEG is one of the registered Independent Evaluation Groups (IEG) for evaluation of the new 5G (or also known as IMT-2020) candidate radio technologies. This group was formed by the COAI to evaluate these technologies from the perspective of Indian telecom network deployments for 5G. The group consist of operators, OEM’s, universities and individual experts participating in a collaborative manner.

The final report of the 5GIF IEG is now published (5D/136) by the ITU-R WP5D group that is evaluating 5G (IMT-2020) technologies. The group was formed by the COAI to evaluate these technologies from the perspective of Indian telecom network deployments for 5G. The group consist of operators, OEM's, universities and individual experts participating in a collaborative manner.

The 5GIF IEG evaluated candidate radio interface technology (RIT) submissions under two categories. The first category involved candidate RIT submissions belonging to the class of globally harmonized standards that are based on technologies developed by the 3GPP (specifically 3GPP New Radio). This was primarily to understand from the COAI perspective on how these technologies would impact Indian networks. The second category of evaluation was on a couple of technologies not belonging to this category of globally harmonized standards. These technologies do not interwork with 3GPP networks (yet) and are of minimal interest. But for many of the members participating in this activity, these technologies posed academic interest. The report was well received by the delegates present at the ITU WP5D meeting#34 held in Geneva from February 19 – 26, 2020.

11. **ICNIRP Update on EMF Guidelines:**

The latest update from ICNIRP published in March 2020 (Refer [https://www.icnirp.org/cms/upload/publications/ICNIRPrfgdl2020.pdf](https://www.icnirp.org/cms/upload/publications/ICNIRPrfgdl2020.pdf)). is based on scientific reports prepared for the World Health Organisation (WHO), the European Commission, national expert groups and continuous monitoring of new research. The process has taken seven years and there was a public consultation in 2018 with more than 1,000 comments from over 120 organisations.

The safety guidelines retain a high level of protection with limits set well below the thresholds for established hazards for all radio frequencies from 2G to 5G. Where changes have been made, these recognise the importance of higher frequencies above 6 GHz to 5G, and provide more detailed guidance for this range. ICNIRP has also introduced a new absorbed power density limit above 6 GHz. The updated guidelines have been anticipated by the industry for some time and test methods exist to ensure the compliance of 5G devices in the market. (Refer [https://www.icnirp.org/en/rf-faq/index.html](https://www.icnirp.org/en/rf-faq/index.html) for FAQs).

It should be noted that the exposures from 5G networks are well below these thresholds. As ICNIRP states ‘The most important thing for people to remember is that 5G technologies will not be able to cause harm when these new guidelines are adhered to.’
12. Spectrum Interference Issue through Sale of Illegal Repeaters/Boosters on e-commerce platforms/websites:

As per the license condition, for providing the service, the licensee shall utilize any type of equipment and product that meet TEC standards, wherever made mandatory by the licensor, from time to time. Thus, as per established norms, telecom service providers shall install repeaters after thorough inspections, only after a request is raised or there is a requirement. TSPs need to ensure that installing a repeater doesn't hamper the network coverage for people outside the distribution area. Such devices manage available signal's input-output mechanism and provide adequate network connectivity to a targeted (and its surrounding) area, thereby covering the entire low-network zone.

However, these repeaters were being illegally sold online. COAI wrote to the e-commerce websites/platforms regarding the sale of mobile signal boosters/repeaters used for enhancement of signals in 800 MHz/ 900 MHz/ 1800 MHz/ 2100 MHz/ 2300 MHz bands, which are licensed telecom spectrum bands assigned to the service providers, who are licensed by the Central Government under Section 4 of the Indian Telegraph Act to provide mobile telephony services. The Act prohibits possession of such apparatus without a licence and possession and sale of such equipment, without obtaining requisite permissions under the Act and Rules framed thereunder, constitutes violation of the provisions of the Act. Most of them immediately acknowledged COAI's submissions and ceased and discontinued selling mobile signal boosters/repeaters on their website/platform.

13. Submissions of SACFA Applications through SARAL SANCHAR Portal:

Various representations were made by COAI to the Government regarding simplification of SACFA Application and Clearance Processes. It was submitted that although WPC has taken several initiatives in the past for streamlining processes, however, we are still facing constraints on account of current SACFA applications and clearance procedures which are causing significant delays in the issuance of SACFA clearances of our telecom sites which subsequently hamper the timely operationalization of our telecom network.

DoT has made the SARAL SANCHAR portal functional for submission of SACFA Applications, which has helped in easing the process and significantly improved efficiency, resulting in faster clearances and transparent working, towards ease of doing business and an enabler for higher mobile broadband penetration for the country supporting the Digital India initiative of the Government.

14. Digital KYC:

DoT issued the final guidelines on April 3, 2019, for implementation of the alternate digital KYC process for verification of subscribers, which are mostly based on the submissions made by COAI.

Post the judgment of the Hon'ble Supreme Court on Aadhaar, COAI and its members approached the DoT proposing minor modifications to the DoT guidelines dated August 24, 2015, allowing the CAF to be embedded with photograph and scanned images and thereby digitize the end to end process for on-boarding of new subscribers by making it completely paperless. COAI submitted that the return to paper-based processes should not be an option as that will reverse the steps taken by the industry towards Digital India and would result in wastage of existing investments and infrastructure.

This Digital KYC process is an app-based customer enrolment method in which live photograph of customer will be clicked by the PoS and embedded in the form along with his/her Pol/PoA. The PoC of the same was conducted by all the TSPs prior to the issuance of the guidelines. COAI also submitted to DoT that the stabilization of the Digital Process is likely to take time considering that the process will have to be implemented across millions of retailer points and company stores across the country and the same, being a new process, is likely to encounter...
challenges and certain fixes will be required for the process to work perfectly. Hence, the extension for implementation of the same was also provided by DoT and the final date for full implementation and roll out of the process was June 30, 2019.

DoT also issued the guidelines for carrying out audit of CAFs of the mobile connections activated through this alternate Digital-KYC process on October 16, 2019, mentioning that the guidelines will be valid from one month of the date of issuance. However, some points in these instructions needed clarification/updation and hence, these were taken up with DoT and reasonable extension was provided by the DoT.

DoT issued the guidelines for carrying out audit of CAFs of the mobile connections activated through this alternate Digital-KYC process on October 16, 2019. However, some aspects in the same needed clarification/updation and the extension was sought on implementation of mandatory PoS address fields in CAF & database and capturing the live photograph of PoS agent & storing it in the backend database for submission to DoT/ DoT LSA Field Units pertaining to D-KYC process.

15. CEIR (Central Equipment Identity Register):

Hon’ble Minister for Communications, Law & Justice and Electronics & Information Technology, Shri Ravi Shankar Prasad, launched the web portal “Central Equipment Identity Register” on December 30, 2019, in Delhi through which the lost and the stolen phone can be directly blocked/tracked for people who have lost their cell phones or their cell phone has been stolen by someone by using simple techniques or better known as the IMEI number which is a Unique Identification number of each handset that has been sold in India for very long.

COAI along with its members had been diligently working with government towards the PoC on implementation of CEIR which was undertaken in Maharashtra LSA with major TSPs of MH LSA, i.e., BSNL, Bharti Airtel, Reliance Jio and Vodafone Idea. Several activities such as enabling the features in live network nodes, arranging vendor support for configuration changes and development work, planning and arranging media for integration with CEIR, development/changes in the IT Network etc. had to be carried out for implementation of CEIR in Maharashtra LSA.

a. First, the person will have to make an FIR filed in the name of his or her mobile handset.

b. After successful police verification, the FIR copy will be awarded to the person.

c. Then the person will have to inform DoT via a helpline number 14422.

d. The DoT will then blacklist the IMEI number.

Ways To Block The Mobile Set:

There are three ways through which one can block his/her mobile handset through the central equipment investigation register:

a. Through Telecom Service Provider

b. Through central police

c. Through online registration form: First, the person needs to lodge an FIR against the stolen mobile phone. After successful FIR, the person will have to take a duplicate SIM card of his or her previous number as stolen and will then have to fill up the Application Form as below. Submit all the relevant documents such as the FIR copy & an identity proof can be Aadhaar/voter ID card. A request ID will be generated when the form will be successfully submitted and the request ID need to be kept for future use.
16. Prepaid Mobile Services in J&K, Assam & North East Service Areas:

DoT issued instructions on March 31, 2020 and provided unlimited extension of pre-paid mobile services in J&K, Assam and North East Service Areas mentioning that these services in these areas shall be operational on continuous basis with effect from April 01, 2020 subject to condition that the existing subscriber verification conditions, security conditions/safeguards, penal provisions, etc. stipulated by the Licensor/Government shall continue to remain in force. Usually, DoT had been providing this extension for a period of a year; however, this time they have extended the same to the period of the license, the way it is in rest of the country.

17. Mandatory Testing & Certification of Telecom Equipment (MTCTE):

The Government had mandated the testing & certification of all telecom and ICT equipment from Indian labs vide its Gazette notification issued on 5th September 2017. As per the initial notification, the MTCTE scheme was to be implemented w.e.f. 1st October 2018, however, vide its various submissions to Department of Telecommunications and Telecommunication Engineering Center, COAI had highlighted various challenges and concerns with respect to the implementation of MTCTE. COAI had requested the authorities that MTCTE should not be implemented until sufficient test labs are established in India and all related technical and procedural challenges are addressed. It was also requested that MTCTE should be implemented in a phase-wise manner; with considerable time-gap between each phase, instead of implementing as a whole at any given time. Basis COAI's submissions, various changes have been facilitated by the authorities on the testing & certification procedures and guidelines as well as in the functionality and design of the MTCTE portal. As requested, MTCTE is now being implemented by TEC in phase-wise manner only and phase-I has been implemented with effect from 1st October 2019 with selected product categories and acceptance of ILAC reports till 30th March 2020. TEC is now working to extend the timelines for acceptance of ILAC reports and to provide minimum 4-6 months for implementation for to-be notified forthcoming phases.

18. Single Brand Retail Trading (SBRT) Policy:

In order to encourage the Foreign Direct Investment (FDI) in India, Department of Industrial Policy and Promotion (now Department for Promotion of Industry and Internal Trade (DPIIT)) released a Press Note No. 1 (2018 series) on 23rd January 2018, and made certain amendments to Single Brand Retail Trading (SBRT) policy. Although, new SBRT provisions exhibited an improvement from the last version, but certain clauses posed significant barriers and ease of doing business related challenges for our member companies in ICT sector. COAI closely coordinated with DPIIT as well as concerned industry stakeholders and made several representations to the department seeking favourable amendments to the SBRT policy. On 29th August 2019, Union Cabinet approved certain amendments in FDI policy for Single Brand Retail Trading. All four provisions as requested by COAI (mentioned below) have been approved by cabinet:

a. All procurements made from India by the SBRT entity for that single brand shall be counted towards local sourcing, irrespective of whether the goods procured are sold in India or exported. Further, the current cap of considering exports for 5 years only is proposed to be removed, to give an impetus to exports.

b. 'Sourcing of goods from India for global operations' can be done directly by the entity undertaking SBRT or its group companies (resident or non-resident), or indirectly by them through a third party under a legally tenable agreement.
c. Entire sourcing from India for global operations shall be considered towards local sourcing requirement. (And no incremental value).

d. Retail trading through online trade can also be undertaken prior to opening of brick and mortar stores, subject to the condition that the entity opens brick and mortar stores within 2 years from date of start of online retail.

19. Simplification of WPC Import License Requirements for Domestic Telecom Equipment Manufacturers:

Vide its several representations and rounds of follow-ups, COAI highlighted to DoT & WPC that current requirements and processes specified by WPC for import license requirements for domestic equipment manufacturers pose several challenges to the Indian factories acting as a global supply hub. These challenges not only put procedural burden in terms of efforts and cost duplications on both applicant and WPC, but also restricts the capability of timely delivery of the products by the manufacturer. Vide its letter dated 26th July 2019, DoT has simplified the import license requirements for domestic telecom equipment manufactures. As per the issued letter, the import process for domestic manufacturers has been simplified in the following way:

a. Domestic OEMs in Domestic Tariff Area (DTA) are now allowed to import Transceivers/Radio Modules against their valid Dealer Possession License (DPL) without any need for import license and quantities as per requirements.

b. Domestic OEMs are permitted to supply respective equipment to domestic customers against a confirmed purchase order and supplier proforma invoice.

c. Domestic OEMs need to submit the prescribed undertaking to custom authorities and RLO along with technical information at the time of import.

d. Sales to domestic customers will be permitted subject to possession of valid WPC frequency authorization by customer. OEMs need to give regular updates on import/distribution data in accordance to DPL terms.

20. Social Media Workshops with Armed Forces:

COAI has signed a Memorandum of Understanding (MoU) with Directorate of Indian Army Veterans (DIAV) for conducting the training programs across Army Skills Training Centres (ASTC) which are affiliated to Pradhan Mantri Kaushal Vikas Yojana (PMKVY) and Regimental Centres at various locations in India through its member organizations. The objective of execution of this MoU is to educate/update Armed Forces Personnel, their families, self-employed women and other attendees regarding the benefits and safe usage of digital platforms and services, use of social media for entrepreneurship and to make an effective and positive impact on day to day activities and operations.

Vide its several representations and rounds of follow-ups, COAI highlighted to DoT & WPC that current requirements and processes specified by WPC for import license requirements for domestic equipment manufacturers pose several challenges to the Indian factories acting as a global supply hub. These challenges not only put procedural burden in terms of efforts and cost duplications on both applicant and WPC, but also restricts the capability of timely delivery of the products by the manufacturer. Vide its letter dated 26th July 2019, DoT has simplified the import license requirements for domestic telecom equipment manufactures. As per the issued letter, the import process for domestic manufacturers has been simplified in the following way:

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Facebook, which is an associate member of COAI has partnered with COAI in conducting such workshops with a motive to educate the students, families, dependents etc. from Armed Forces families regarding safety and important features of Facebook, use of Facebook to promote and grow small/medium/large business (entrepreneurship) including ideas, interest, hobbies and stories. The workshops being conducted by Facebook and COAI can help the trainees across these ASTC and play a vital role in empowering them for the respective business opportunities. Starting from August 2019 to till March 2020, total 24 workshops have been organized by COAI & Facebook across 7 states in India.
Significant Achievements for the Year 2019-2020

16 States/UTs
aligned their Telecom Infrastructure Policies with RoW Rules, 2016

Continuity of business during COVID-19

Shri Ravi Shankar Prasad
Hon’ble Minister for Communications, Electronics & Information Technology and Law & Justice, Government of India

EMF Advocacy
Debunked the prevailing myths regarding Emission from Telecom Towers
21. Alignment of Telecom Infrastructure Policy with RoW Rules, 2016:

I. Policies aligned and notified:

The Right of Way Rules, 2016, are certainly a progressive and forward-looking step to achieve the Digital India vision and allows for the uniform growth of telecom infrastructure in all States, as it provides the process for grant of permissions for the installation of underground and overground telecom infrastructure, Single Window Clearance via an online portal, the appointment of nodal officers and simplifying documentation.

Till date, 16 States have aligned their Telecom Infrastructure policy with RoW Rules, 2016 that has streamlined hassle-free Right of Way processes. Some of the Telecom Infrastructure Policies like Odisha, Assam, Himachal Pradesh, Tamil Nadu Govt. Order, etc. are very progressive and help in an exponential growth of Telecom Infrastructure across the state.

II. Policies under discussion:

Policies of remaining States/UTs like Delhi, West Bengal, are under discussion with the government.

However, the delay in the alignment of State Telecom Infrastructure Policy and implementation issues faced on the ground is acting as the biggest roadblock to achieving this aim. DoT encourage the remaining States /UTs to align their policies with RoW Rules, 2016 for faster readiness of the state for contributing towards connected Digital India roadmap, encompassing programs like Smart Cities and Digital Society.
22. **Telecom Sites saved during 2019-2020:**

COAI's intervention at the circle level has led to saving of the telecom infrastructure for continuity of the business.

**a. 300 Pole sites activated in Mumbai:** 300 pole sites of our members are installed since 2008 (year) on flyovers across Mumbai circle were switched-off by Maharashtra State Road Development Corporation Limited (MSRDC). Post COAI's intervention, all 300 sites were activated again.

**b. Sites de-sealed during the year:** Post COAI's intervention and engagement with corporations across India, approx. 80 sites were de-sealed.

**c. Regularisation of Tower:** Post COAI's intervention and engagement with corporations across India, approximately 1 lakh towers were regularised across India.

23. **Continuity of business during COVID-19:**

Ensuring network availability and operational continuity of the essential telecom services and robust telecom infrastructure during the critical period when restrictions were imposed for COVID-19, the Telecom Infrastructure Committee and Circle Coordination Committees marshal their resources for a quick and effective response.

**a. Engagement with the Central Government, State Governments, Central DoT Officials and LSA officials of DoT:** Industry engaged the Central Government, State Governments, Central DoT Officials and LSA officials of DoT to ensure uninterrupted telecommunication services & deployment of telecom infrastructure during COVID-19 pandemic. 243 favourable directions were issued across India to ensure movement of employees of Telecom Service Providers and their contractual staff.

**b. Fibre cut stopped:** Post COAI's intervention, the number of optical fiber cuts, were reduced from approximately 100 per day from before the quarantine to approximately 19 fiber cuts during the period of the quarantine i.e. during the period of 24th April 2020 – 3rd May 2020.

**c. Sites de-sealed:** Industry engaged municipalities of Delhi, Ghaziabad, Noida, Gurugram, Faridabad, Punjab, Haryana, J&K and Chandigarh for de-sealing of the existing sealed sites having permissions to ensure uninterrupted connectivity round the clock to support the Work From Home, delivery of various critical services and maintain communication across the State including for those involved in the rescue and preventive operations against coronavirus at various levels.

Post COAI's intervention, approximately 40 sites were de-sealed by local municipalities across Mumbai and Rest of Maharashtra while 5 Site were de-sealed by Delhi MCD.

**d. Ensure availability of diesel to the industry sites:** DDG (T) and Chief Secretary of various states were engaged for making the available requisite supply of diesel per day for maintenance of telecom services across the states/UTs, by allocating dedicated petrol pumps or any other workable arrangement during the lockdown period during COVID-19 i.e. during the period of 24th April 2020 – 3rd May 2020.

CCCs played a vital role and did tremendous hard work to ensure the operational continuity of telecom services given COVID-19 outbreak. Same was also appreciated by the Hon’ble Prime Minister, Shri Narendra Modi, in his speech recently.
24. Public Facing Advocacy on EMF Issues across identified Circles:

The issue of health concerns from the radiations of mobile phone towers/networks has been in the limelight for some time. In this regard, several studies have been conducted in different countries, under the aegis of World Health Organization (WHO). There is no conclusive scientific evidence of adverse health effects due to RF emission from mobile towers. WHO has referred to approximately 25,000 studies, conducted around the world over past 30 years, and based on an in-depth review of scientific literature, has concluded: “current evidence does not confirm the existence of any health consequences from exposure to low-level electromagnetic fields”. Since the effects on human beings are to be studied over a long period, further studies are going on around the world.

The Department of Telecommunications (DoT) has time and again re-iterated that the EMF Radiation from mobile towers doesn’t have adverse impact on human health. EMF Awareness Session led by DoT was organized on 30th January 2020, at Panchsheel Club, Delhi to spread awareness around the scientific facts about the EMF emissions from telecom towers.

DoT officials re-iterated that government relies on WHO 20,000 studies and reports are reviewed every 10 years. Speakers asserted tower radiation is not harmful and India has strict radiation norms that are 10 times stricter than the world standard. DoT confirmed that towers are safe and it can be installed at any location Panel re-iterated that WHO has concluded that ‘…current evidence does not confirm the existence of any health consequences from exposure to low-level electromagnetic fields’. A committee comprising of RWA members, COAI and TSP/IP to identify the sites for the towers.

In a recent development, on 11th March 2020, The International Commission on Non-Ionizing Radiation Protection (ICNIRP) has released new guidelines for the protection of humans exposed to radio frequency electromagnetic fields. The guidelines cover the upcoming 5G technologies, as well as AM and DAB radio, WiFi, Bluetooth and the currently used 3G/4G mobile phones. The new electromagnetic field guidelines have taken seven years to develop after a thorough review of all relevant scientific literature, scientific workshops and an extensive public consultation process. They provide protection against all scientifically substantiated adverse health effects due to EMF exposure in the 100 kHz to 300 GHz range.”

Also, recently, the Australia’s Chief Medical Officer has re-iterated that “I’d like to reassure the community that 5G technology is safe. There are no evidence telecommunication technologies, such as 5G, cause adverse health impacts.”

All these international studies are being shared with the Doctors, DoT LSA officials, Academic and influential community to sensitize them with the latest scientific knowledge so that myths surrounding the health impact of EMF are displaced.
25. **Customs Duty for Routers:**

As per the existing provisions of Customs Tariff Act, 1975, “Routers” have been categorized under HS Code 8517 69 30 with Basic Customs Duties as Zero. Further, Routers are a part of the Information Technology Agreement (ITA-1) and therefore no custom duty is applicable on the import of these devices.

In the finance bill HS Codes 8517 69 30 with Basic Customs Duties as Zero for Routers was omitted.

Consequent to above, Routers may fall under the classification under customs tariff item 8517 62 90 (residual entry) against which the statutory rate of Basic Customs Duty is 20%.

This will cause ambiguities and concerns to the industry stakeholders with respect to the import processes and cost implications in terms of customs duties.

Representation sent to MoF and to DoT requesting the following.

a. The alternate HS Code(s) for “Routers” should be defined at the earliest.

b. There should be no hike in Basic Custom Duties for “Routers”.


26. **April 25, 2019, DoT issued circular No. 1-28/2006/LF-II (LPA Division) with regard to Deduction Verification of ILD Operation:**

DoT has issued an order wherein ILD operators have been allowed to submit only the Statutory Auditor’s Certificate for the purpose of verification of deductions on paid basis from FY 2013-14 to FY 2018-19. This will ease the process of pass through charges.

**Financial impact of the same is approx. INR 100 Cr.**

27. **Automation for Assessment of LF/SUC process:**

Post various discussion held with DoT/CCAs, DoT is in the process of implementation of a Revenue Management Software (RMS)-SARAS (System for Assessment of LF Revenue and SUC), which would digitize the assessments, payment and accounting of license fees, spectrum usage charges etc.

SARAS would enable the Licensee to make online payments, digitally file and verify deduction claims, AGR statements, bank guarantee details along with enabling the Department to conduct online assessment of LF and SUC, management of bank guarantees, handle representations etc. This will ease the process of deduction and verification.

The software is being developed by M/s NSDL Ltd. and EY is being appointed by DoT as consultant for this project.

**Currently it is under trial by DoT.**
28. DoT - Guidelines/clarifications for one-time deduction reverification exercise:

In February 03, 2020, DoT issued guidelines/clarifications for one-time deduction reverification exercise

DoT directed CCAs to re-open (Deduction Verification Report) DVRs of previous years for clearing all anomalies in verification in light of representations made by the industry.

Concerned CCAs are being directed by DoT to provide one-time opportunity to TSP vide a letter/e-mail issued to TSP to this effect.

TSPs were advised to submit their final appeal and all relevant documents within 15 days of receipt of letter/e-mail issued by CCAs in this regard.

During this one time reopening and reverification, fresh invoices as well as new supporting documents not submitted or considered earlier in support of existing Deductions Claimed on paid basis should be accepted and considered for verification.

All CCAs are to carry out a onetime reopening and re-verification exercise to implement the existing orders and these new Guidelines/Clarifications.

Vide this notification, DoT has issued clarification on various long pending issues. Post getting the clarification on few items after industry workshop in Goa in 2017, this is the second time, when DoT issued bulk clarification on industry issues.

This will help the operators in reduction of disallowance.

Some of the points clarified by DoT are as follows:

a. Objection Report and Speaking Order to be provided to TSP with 15 days' time for representation.

b. Deductions were restricted to lower of cash or accrual claims. Same can be claimed on amount actually paid basis.


d. Disallowance of 3G Intra Circle Roaming Pass Through Charges - In some cases deduction for 3G ICR were allowed but was restricted to actual usages. DoT directed to CCAs that 3G ICR claims, including the minimum commitment/ premium usage charges, are admissible deductions, subject to submission of supporting documents (concerned invoice and bank statements).

e. Disallowance of J&K GST paid under Amnesty scheme – CCA of J&K had disallowed GST paid amount claimed in AGR statement. Same is being allowed as deduction.

f. Accordingly, deductions for the same may be allowed subject to submission of challans, along with a self-certification that the amount has been paid. Relevant DVRs to be revised accordingly.

g. Disallowance of IUC charges paid to TSPs who have now closed their operations and the operator has the invoices: The IUC cost actually passed through to the closed operator related to this transaction may be allowed subject to the condition mentioned in the antifiction.

h. Supplementary Invoices: Any supplementary invoice for pass through charges pertaining to BSNL will be allowed subject to verification of invoices and payment proofs, provided that they have been claimed earlier in the Audited AGR of the year of supplementary invoice.

Key Takeaway/s:

In February 03, 2020, DoT issued guidelines/clarifications for one-time deduction reverification exercise

DoT directed CCAs to re-open (Deduction verification report) DVRs of previous years for clearing all anomalies in verification in light of representations made by the industry.

This notification helped the industry in reducing not only significant costs on litigation / coordination but also eased situations with respect to funds which otherwise would have been blocked - thereby enhancing ease of doing business.
Submissions for the Year 2019-2020

1. TRAI Consultation Paper on Tariff issues of Telecom Services (Floor Tariffs) issued by TRAI on 17th December 2019:

COAI made following key submissions on this Consultation Paper:

a. TRAI should change the existing regulatory regime of complete forbearance in tariffs and regulate tariffs to protect the interest of telecom service providers.

b. Fixation of a floor price is the way forward to guarantee minimum revenue for the TSPs to ensure the viability and orderly growth of the sector.

c. Complete cost recovery should be the objective of the floor price, which includes return on capital employed.

d. Floor price should be fixed only for an interim period, say period of two years, after which the Regulator may review the Tariff regime.

e. Floor price should be applied uniformly to all categories of subscribers and for all type of tariff plan offerings.

f. Voice tariffs should remain under forbearance.

2. TRAI Consultation Paper on Review of Interconnection Usage Charges (ILD Termination Charge) issued on 8th November 2019:

COAI made following key submissions on the said Consultation Paper:

a. Increasing the value of ITC will increase the share of Indian TSPs on the total tariffs charged, for the outbound calls from the foreign countries to India, thus allowing the Indian TSPs to earn revenue in the form of FOREX.

b. Indian TSPs would be better placed in terms of ILD calling charges and can bring down the outgoing ILD calling rates for the Indian subscribers.

c. TRAI should specifically prescribe a much higher rate of ILD termination charge, considering the fact that ILD termination rates of other countries is far higher as compared to India.

d. TRAI to kindly come out with the Regulatory Framework for OTT players at the earliest.

3. TRAI Consultation Paper on Traffic Management Practices (TMPs) and Multi-Stakeholder Body for Net Neutrality issued on January 02, 2020:

COAI in its response to the said consultation paper has made following submission:

a. Similar regulatory framework, as applicable to the TSPs, to enforce the Net Neutrality principles, should be prescribed for all stakeholders, so that all stakeholders in the Internet ecosystem can be brought under the ambit of the Net Neutrality Principle. This will ensure the Neutrality in the whole ecosystem and not just at the network level (access providers).

b. The service providers should be allowed to take the measures or actions necessary for the traffic management and network management, provided that the same does not affect the free competition and impede user choice.

c. We submit that the Government should continue with the existing regulatory framework on Net Neutrality as enunciated in the licence amendment of 26.09.2018, while permitting TSPs to employ various traffic management practices as per the varying needs of traffic types, services and users and not issue any further rules/regulations on TMPs.
4. **Payment of the Spectrum acquired by TSPs:**

COAI submitted the letter to DoT on February 07, 2020 highlighting following issues on the payment terms for the spectrum acquired by TSPs:

a. Reduction in SUC: Effective rate of the SUC should be reduced by 3% for all the TSP’s in each service area, after removal of existing SUC floor of 3% of AGR. Nominal rate of SUC, say 0.5-1% of AGR, should be prescribed for forthcoming auctions for recovering only the administrative cost.

b. Payment for spectrum acquired by the TSPs:
   - Reduced uniform up-front charge of 10% of the winning price for every band in the spectrum auctions.
   - Option should be given to operator to either stay with the current moratorium scheme or opt for similar reduction in uniform up-front charge of 10% of the winning price for every band at each auction level for auctions held in past.
   - Seek upfront charge at the time of the assignment of the spectrum only, without any interest.
   - B.G. for an amount equal to 5% of the final price as a security till the time upfront payment is made.

5. **Support from the Government to Address the Current Health of the Telecom Sector:**

COAI submitted the letter to Secretary DoT on February 26, 2020 with a copy to Hon’ble MoC and the DCC members. COAI vide its said letter made following request:

a. AGR related payments:
   - Government to allow set-off of GST credits lying with the government.
   - Payment of balance amount of interest, penalty, and interest on penalty be allowed in a staggered manner.
   - Alternately, Government may consider granting loan equal to the AGR amount at 6% rate of interest.
   - Reduce License fee from 8% to 3%.
   - Reduction in SUC: Rate of the SUC should be reduced by 3% for all the TSP’s in each service area, after removal of existing SUC floor of 3% of AGR.
   - Immediate implementation of Floor Price for Data services.
   - GST Waiver on sovereign payments.
   - Review of need for Bank Guarantees (Bgs)

6. **TRAI consultation paper on Review of Per Port Transaction Charge and Other Related Charges for Mobile Number Portability issued on February, 22, 2019 and updated on April 01, 2019:**

COAI in its response to TRAI made the following submissions:

a. Methodology adopted by TRAI to calculate the Per Port Transaction Charge (PPTC) should be continued. The additional cost of 1-3% of the overall costs, on account of changes in MNP process, be included in the overall costs.

b. There should not be any charges for number return, port cancellation and NPD requests which is to be paid by the TSPs to MNPSPs as the activities pertaining to these charges are required to be carried out by the service providers to comply with the Regulations.

c. The Dipping Charges should continue to be under forbearance.

d. DoT to allow the deduction of Per Port Transaction Charge paid by the Recipient Operator from its Gross Revenue for calculating AGR for the purpose of payment of license fee and SUC.

Furtherance to the above mentioned consultation, TRAI issued the draft Telecommunication Mobile Number Portability Per Port Transaction Charge and Dipping Charge (Amendment) Regulations, 2019 on August 16, 2019. COAI made following submission to this draft regulation:

a. Costs on account of consultancy and related charges should not be considered as part of the cost for the calculation of PPTC.
b. Separate charges for providing ancillary services are not necessary as the costs for providing all the services have been considered while arriving at the PPTC.

c. TRAI to issue appropriate regulations / recommendations to create a competitive environment in MNP.

d. TRAI to consider adoption of blockchain which may reduce the cost of porting and increase the efficiency of the process.

TRAI issued the final regulation on September 30, 2019 and prescribed the PPTC at Rs. 6.46. This has come into effect from November 11, 2019.

7. TRAI Consultation Paper on Review of the Regulatory Framework for Interconnection issued by TRAI on 30th May 2019:

COAI in its response to TRAI made the following submissions:

a. Authority should do away with the archaic requirements like interconnecting at SDCA levels with the fixed networks of the PSUs and the interconnection at Level-II (LDCA level) or Level-ITAX.

b. Considering traffic and redundancy requirements, a finite number of POIs i.e. 3-4, at the circle level should be mandated for both PSTN to PSTN and Mobile to PSTN connectivity at the circle level.

c. Similarly, Point of Interconnection for NLDO-PSTN and Mobile-PSTN connectivity should also be reviewed and connectivity should be mandated at 3-4 locations in the licensed service area as recommended for PSTN-PSTN.

d. As a futuristic requirement, TRAI should consider doing away with licensed service area wise interconnection requirements. TRAI may recommend to DoT for the change in the Licence conditions in this regard.

e. There should not be any Transit Carriage Charge and TAX Transit Charge levied upon any of the TSPs once the traffic has been handed at the declared Point of Interconnect.

8. TRAI Consultation Paper on Review of Scope of Infrastructure Providers Category-I (IP-I) Registration issued by TRAI on 16th August 2019:

The key submissions made by COAI on said Consultation Paper are as below:

a. Pass through should be allowed for any consideration paid by one TSP to another for active infrastructure sharing.

b. In case Pass through is not allowed in such case either:
   i. Scope of the IP-1 is enhanced under Registration: In such scenario:
      • Active infrastructure should be only provided to licensee(s)
      • Active infrastructure can be procured by IP-I for sharing with licensee(s) only basis the agreement between licensee and IP-I.
   ii. Scope of the IP-1 should not be enhanced under registration. In case the Scope of IP-1 is enhanced, the same should be done by introducing new UL (Authorisation):
      • In such scenario as well, UL (Authorisation) to provide services ONLY to UL licensee having Access Authorization.
      • Compliance to various guidelines should be made mandatory for such entities

9. TRAI Consultation Paper on Reforming the Guidelines for Transfer/Merger of Telecom Licenses issued by TRAI on 19th September 2019:

COAI in its response to TRAI made the following submissions:

a. No separate approval should be required from Licensor after the Transfer/Merger of the licenses is sanctioned by Tribunal/Company Judge.

b. There should not be any commitment imposed on the merged entity to set aside 20% of wholesale capacity for the MVNOs on Mobile Bitstream Access (MBA) basis.
10. TRAI Consultation Paper on Transparency in Publishing of Tariff Offers issued by TRAI on 27th November 2019:

The key submissions made by COAI on this Consultation Paper are as below:

a. Endeavor of the Regulator needs to be reduction in the cost of the compliance for TSPs & also ensure that the consumers receive clear and concise information on tariffs.

b. Current TRAI Regulations are sufficient to address the interests of the consumers on disclosure of complete terms & conditions of the tariff offers in a transparent, clear and simple manner.

c. Other than the presently prescribed format, there is no need for any new regulation/order to prescribe formats for other modes for the publication of the tariff offers.

d. TSPs are already publicising their tariff offers on their website in an effective manner, there is no requirement of any additional regulatory intervention

11. TRAI Pre-Consultation Paper on Enabling Unbundling of Different Layers Through Differential Licensing issued on 9th December 2019:

COAI in its response to TRAI made the following submissions:

a. Differential licensing regime for different layers amounts to moving away from the principles of unified licensing and convergence.

b. There is no requirement of unbundling various layers of the license as the current licensing regime supports the layered approach w.r.t Infrastructure, Service and Applications.

c. Objective of introducing different licensing layers can be achieved by providing appropriate Policy and Financial stimulus to the existing TSPs i.e.

- By allowing Pass-through for any consideration paid by one TSP to another for active infrastructure sharing.

12. TRAI Telecommunication Mobile Number Portability (Seventh Amendment) Regulations:

TRAI had issued the seventh amendment to the Telecommunication Mobile Number Portability Regulations (MNP Regulations) on December 13, 2018. The amendment was to be effective from June 13, 2019. COAI, vide its letter dated May 09, 2019, requested TRAI to extend the time line for implementation of the Regulations till September 30, 2019.


The key submissions made by COAI in its response are as below:

a. Commercial VSAT CUG service provider should be permitted to provide backhaul connectivity for mobile services only.

b. There is no pertinent need to allow Commercial VSAT CUG service providers to provide bare backhaul capacity to Wi-fi hotspot providers and the same can be provided as Internet connectivity/ bandwidth to the ISPs provisioning Wi-fi hotspots.

c. The scope of the VSAT should be enhanced to the extent of providing the satellite based backhaul to the mobile services and the long-distance carriage rights, granted for NLD, ILD and access services should not be covered under the scope of this service.

d. To have equity across different license, WPC spectrum charges for VSAT services in NLD/ Access License should be charged at a percentage of AGR from the provision of the VSAT services instead of existing formula-based mechanism.
14. COAI Submissions on TRAI TCCCPR, 2018:

TRAI had issued the Telecom Commercial Communications Customer Preference Regulations, in July, 2018. COAI has been coordinating with various industry stakeholders in order to ensure that the industry implements the provisions of the said Regulation. COAI has played a key role in preparation of the Code of Practices which has been adopted by all the telecom service providers. COAI had also engaged various vendors for implementation of the Distributed Ledger Technology (DLT) based solution as provisioned in the Regulations. For the year 2019-20, following submissions were made by COAI:

a. Submission on Performance Monitoring Report: TRAI had prescribed the Performance Monitoring Report (PMR) format and asked the TSPs to submit the reports for the month of March 2019 and onwards. Vide our letter dated May 14, 2019, COAI had raised various concerns of the TSPs w.r.t. the prescribed PMR formats and the issues being faced by the TSPs to implement the provisions of the TCCCPR, 2018.

Furtherance to the above, TRAI issued a Direction on 06.08.2019 prescribing the format to submit the Performance Monitoring Report on monthly basis. In this regard, COAI, vide its letter dated September 16, 2019, submitted certain limitation of the TSPs in submitting the reports in the desired format as the DLT solution of the TSPs were yet to be completed.

TRAI, vide its email dated 07.11.2019 prescribed supplementary PMR formats and asked the TSPs to submit the reports on these formats along with the already prescribed PMR formats on monthly basis. COAI, vide its letter dated November 26, 2019, submitted certain observations against these formats and requested TRAI to consider these observations.

b. Submission on definition of Transactional, Promotional and Service Messages: One of the important aspects of the TCCCPR, 2018 regulations is to have a common criterion to define and categorizes various commercial communications under the three defined categories i.e. Transactional, Promotional and Service. COAI conducted various meetings/calls and detailed deliberation amongst the member TSPs to ensure that the TSPs follow common criteria for categorization of commercial communications under these categories. COAI, vide its letter dated May 31, 2019, submitted to TRAI, the agreed position of the TSPs for these three categories along with the illustrations.

c. Submission on separate numbering series for Transactional and Service Calls: One of the provisions of the TCCCPR, 2018 is to take initiatives to enable the Calling Name Display (CNAM) based on Intelligent Network or ISDN based protocols, enhance Calling Name (eCNAM) functionality as defined in 3GPP technical specifications TS 24.196 for providing services to terminating users with the name associated with the originating user and optionally delivering metadata about the originating user. Vide COAI letter dated July 22, 2019, we had highlighted the issues/difficulties in implementing the CNAM and requested TRAI to consider recommending either different sub levels within 140 series or separate numbering series for service and transactional calls while the TSPs explore the possibility of implementing the CNAM.

d. Discontinuation of TRAI NCPR Portal: Vide our letters dated September 30, 2019, COAI had requested TRAI that as the DLT solutions of the TSPs are yet to be implemented completely, the TRAI NCPR portal should remain operational so that TSPs can redress the complaints being received through the portal and new preferences of the customers can be registered in the NCPR portal. Further, vide letter dated November 14, 2019, we again requested TRAI to continue with the complaint module of the NCPR portal till
November 30, 2019 as a fail-safe measure so that the TSPs can ensure the stability and effective functioning of the DL-Complaint module.

e. **Compliance to the TCCCPR, 2018:** TRAI vide its email dated 05.12.2019 sought status of compliance to the TCCCPR, 2018 from the TSPs. COAI, vide its letter dated December 12, 2019, the updates on the important deliverables under TCCCPR, 2018 and requested TRAI to sought the clause wise compliance once the TSPs completes all the implementation process.

Further, TRAI issued its Direction on 20.01.2020, directing the TSPs to ensure the compliance to the various provisions and stop the traffic of those entities that are not registered themselves/their headers/templates in accordance to the TCCCPR, 2018. TRAI also directed the TSPs to run a media campaign either individually or collectively informing the consumers and entities regarding the provisions of the regulations. COAI, on behalf of its member TSPs, published the advertisement and submitted the compliance to TRAI vide letter dated February 05, 2020.

COAI, vide its letter dated March 05, 2020, on behalf of the telecom industry, requested other Industry Associations/Organizations to advise their associated entities to take the required steps to enable the TSPs to comply with the provisions of aforementioned TRAI Direction.

Due to the COVID-19 outbreak and various restrictions being imposed nationwide, COAI, vide letter dated March 18, 2020, requested TRAI that the complete change and overhaul in the commercial communication mechanism can wait in order to avoid any possible adverse impact on the citizens and hence status quo should be maintained till March 31, 2020.

**15. Review of Definition of AGR:**

COAI submitted the letter to Secretary DoT on February 6, 2020 COAI vide its said letter made following request:

a. Review the definition of AGR prospectively as mentioned in NDCP 2018

b. Accept and implement the recommendations of TRAI on AGR dated January 2015.

c. All kind of payments (either fixed or variable) made for any telecom input resource by one TSP (Licensee) to another TSP (Licensee) should be allowed as a deduction to the former.

d. Constitute a Multi Stakeholder Committee under the aegis of DoT to work on the above highlighted issues.

**16. Finance and Policy Related Issues:**

COAI made various representations to Members (Finance), DoT and other concerned Senior Officials in DoT the on the following Regulatory Finance related issues:

a. Reforms in AGR finalization and other measures

b. Allow deductions of lease line/bandwidth charges and the charges paid by one TSP to the other TSP as Pass through charges

c. Lower of Accrual and Paid being considered to derive the AGR

d. Payment of L.F. in Q4 to be delinked from the payment made in Q3

e. Review of the provisions of penalties levied @ 50%

f. Realized vs Unrealized Forex

g. ICR minimum commitment

h. Levy of SUC on Wireline Revenue

i. Alignment of the FBG with the LF and SUC payouts of telecom operators
j. Rejection of Pass through claims related to operators, which have shut down their operations

17. DoT M2M Guidelines:

Based on request from members, COAI submitted a letter on 24.01.2020, requesting following:

a. Six months extension for implementing the M2M KYC guidelines for all M2M SIMs.

b. DOT should create a mechanism to allow certain enterprise more than four URLs/IP Addresses for a particular use case. DoT can open a separate cell looking into the demands of the enterprise.

c. Explore the possibility of making the M2M guidelines issued by DoT on 16.05.2018 applicable only for those M2M connections which were provided after 16.05.2018.

18. Consultation Paper on SAR Limits for RF Devices Used in Close Proximity to Human Body by TEC:

The Consultation Paper was issued by TEC in March 2019 and key points submitted to TEC are as below:

a. The ICNIRP guidelines have served across the globe for over 20 years. With the imminent revision of these guidelines, the new ICNIRP Guidelines will be a reflection of the scientific consensus based on the new research work published since 1998. This should thus account for new technologies, new frequencies and should address the needs of all members of the global society.

b. IEC 62209-1 and IEC 62209-2 are good standards and are current as of today. However, a joint working group set up by IEC and IEEE has been working to combine and update the requirements in 62209-1 and 62209-2 as well as the IEEE P1528 into a single document. This work has completed, passed at the first round of vote and is due for the second vote shortly. If successful, this revised standard will be published in the next few months, this should be adopted when approved.

Subsequently, a Development Coordination Committee (DCC) meeting was held in November 2019 to discuss the draft document (No. TEC/SD/DD/SAR-XXX/01/XXX-19) on Specific Absorption Rate (SAR) Limits for Wireless Communication Devices used in close proximity to human body. Industry provided inputs during the meeting and the document is not finalized yet.

19. 5G:

COAI has been working very closely with the Department of Telecommunication and the 5G High Level Forum of the Government to frame policies for India. COAI also participated in the report on trials for 5G/experimental spectrum. The final recommendations of the committee were as follows:

a. Trial spectrum for 1 year extendable by another year. Initial 3 months period (before the beginning of 1 year) for logistics.

b. Trial license to be given per LSA.

c. E&V bands will be allocated as per the requirement.

d. All spectrum requirements (access & backhaul) have to be made in one single application and allotment will also be made in one go.

e. Trial spectrum shall not be used to offer any commercial services.

f. There will be single window clearance provision.

DoT also announced conduct of 5G trials in 2020, for which 5G Trial Committee sought applications in the proforma for joint application by Telecom Service Providers (TSPs) and Original Equipment Manufacturers (OEMs) to Department of Telecom (DoT) for conducting 5G Trials. Members have submitted 5G trial application to DoT and awaiting revert from DoT regarding commencement of trials.
20. Proposal on Uncovered Villages Program:

Industry assured DoT that the TSPs are committed to collaborate with the Government in taking the Hon'ble Minister, Shri Ravi Shankar Prasad, initiative forward to expedite connectivity to all villages across the country. Industry suggested following key principles:

a. Distribution of Work and subsidy should be equitable.

b. Scheme should be for compensation of cost and should not become a profiteering scheme.

c. It should not create any monopoly.

A joint proposal was submitted to DoT basis these key principles. Some of the points of submission for scheme design are as follows:

a. Uncovered villages to include only those villages which are not covered by any TSP

b. No duplication of Infrastructure

c. Infrastructure sharing amongst TSPs should be mandatory

d. Technology Selection should be at the discretion of TSPs

21. TRAI Consultation Paper on Cloud Services issued on October 23, 2019:

Highlights of the submission made to TRAI are as follows:

a. Unlike traditional service providers, CSPs do not fall within the same category of service providers as defined in the Telecom Regulatory Authority of India Act, 1997 (TRAI Act) owing to the fact that CSPs merely use the existing connectivity provided by telecom service providers and do not constitute telecom service providers in itself by themselves. Since CSPs cannot be classified as a telecom service provider under the current definition, the creation of a regulatory framework for CSPs does not fall within the ambit of the Telegraph Act and TRAI Act.

b. The Indian market has successfully adopted cloud across sectors including banking and finance, telecom, and public sector. At present, there already exists adequate legal and regulatory framework that are applicable to CSPs.

c. Since CSPs require an enabling environment to provide innovative solutions and services in India, they should not be subjected to any further regulation (in addition to the existing legal frameworks) through an industry body or regulator that may be burdensome or restrict their ability to innovate.

d. No membership requirements or industry body registration should be made mandatory for CSPs.

TRAI Open House Discussion was held on 28th February 2020 where these submissions were highlighted to the Regulatory Authority and other Associations were also supportive of COAI points.

22. TRAI Consultation Paper on Developing a Unified Numbering Plan for fixed line and mobile services issued on September 20, 2019:

COAI in its response to TRAI made the following submissions:

a. Unified numbering scheme should only be introduced if there is no alternative method to meet the future ascertained requirement of 4.68 billion mobile numbering resources till 2050.

b. '0' + STD code be made mandatory for accessing fixed line from mobile/ fixed line and Mobile number to be dialed without '0' from mobile/fixed line. '0' and STD code is already mandatory for accessing inter-SDCA fixed line from fixed line and well as intra-circle and inter-circle fixed line from mobile. The new modification will mandate dialing fixed line with '0' and STD code for intra-SDCA calls also. This also requires mandating mobile numbers without dialing '0'. This solution will make available 7 billion mobile numbering resources to cater to the future need of mobile numbering.
series till 2050 and will involve minimal changes at the network, routing and interconnection requirements.

c. One of the members TSPs (RJIL) propose a different view: The Unified Numbering Plan should be implemented as soon as possible instead of any temporary solutions in the short term. They also mentioned that prefixing of 0 is an idea that has been discussed, deliberated and dropped by TRAI.

d. The present criterion of allocation of numbers is very stringent and ensures effective utilization of numbers.

23. IF3 (Indian Friends of 3GPP):

COAI being the Market Representation Partner (MRP) of 3GPP from India had been constantly engaging with 3GPP on requirements coming from the Indian market, as COAI members have a sustained business developed using 3GPP technologies and standards. To fulfil these activities, COAI formed the Indian Friends of 3GPP (IF3) to facilitate collective activity to host 3GPP meetings of relevance to India, within India and to do so in a manner that is cost effective, efficient, and which meets with the expectations of the 3GPP community. Further, COAI, in the year 2019-20 along with IF3 hosted one 3GPP meeting SA6#35 in Hyderabad in the month of January 2020. Around 100 delegates from across the globe participated in these meetings. The other meetings namely RAN5#86, SA5#129 and SA2#137 were also scheduled in cities like Hyderabad, Pune and Delhi in the month of February but had to be postponed due to the outbreak of COVID-19.

24. Refund of Additional Custom Duties Imposed on LTE and Related 3G/4G Products:

The notification issued by Department of Revenue on 11th October 2018 enlisted the Long Term Evolution (LTE) products under the HSN 8517 69 90 with 20% custom duty. Pursuant to this notification, Custom had started imposing a Basic Custom Duties of 20% on all the respective products with effect from 12th October 2018. It seems that the aforesaid products were inadvertently captured under the different HSN, and therefore, vide its subsequent notification dated 29th January 2019, Department of Revenue has issued further amendments and reframed description for HSN “8517 62 90 or 8517 69 90”. Basis the amendments issued on 29th January 2019, it is understood that the earlier notification dated 11th October 2018 was intended not for change in classifications of items but for the revision in Basis Custom Duty which was applicable w.e.f. 12th October 2018 whether the items covered under 8517 62 90 or 8517 69 90. Therefore, the BCD applicable on LTE and other products for the period 12th October 2018 to 29th January 2019 was 10% only, however 20% BCD has been charged by the Customs during that period on the respective products considering the ambiguities in the respective notifications.

COAI has requested CBIC to issue necessary instructions to the concerned authorities to refund the additional Basic Custom Duty (BCD) imposed on the importers of respective products during the period 12th October 2018 to 29th January 2019.

25. Simplification for SCOMET Licenses:

COAI had represented to Department of Commerce, Ministry of Commerce and Industry that as per the existing provisions, exports of certain items – categorized as dual-use goods and even items for repair – require SCOMET (Special Chemicals, Organisms, Materials, Equipment and Technologies) licenses from DGFT, Ministry of Commerce. Since Indian manufacturing facilities have direct relationship
only with Global distribution entities and not with end-customers, they are not able to fulfil the prerequisite criteria of possessing End-User Certificate and End-User PO. This results in delay as well as loss of business and production from the Indian Factories. COAI has requested to introduce a General Validation License (GVL) for an Exporter with a broad list of specified countries and specified end-customers to which that Exporter (Indian Manufacturing Facilities) can ship to without prior need of an End-User Certificate and Purchase Order. The GVL holder Exporter could furnish an annual report on the shipment details as required by the DGFT and Ministry of Commerce.

26. Payment of Pending Dues from BSNL and other Public Sector Units (PSUs) towards Telecom Equipment Manufacturers and Infrastructure Providers:

COAI has made representations to Department of Telecommunications as well as Hon'ble Minister of Communications for an intervention to facilitate the earliest release of all pending dues from BSNL, MTNL and other PSUs towards telecom equipment manufacturers and infrastructure providers. The overall dues from these PSUs towards telecom industry ranges around INR 20,000 crores.

27. Promoting Local Telecom Network Manufacturing & Incentivizing Exports:

COAI is closely coordinating with Department of Telecommunications for Promoting Local Telecom Network Equipment Manufacturing and Incentivizing Exports. Several global Telecom OEMs including Nokia and Ericsson have set up state-of-the-art manufacturing units in India apart from having their global R&D and service delivery centres employing tens of thousands of people in the country. Indian headquartered telecom manufacturers have also seen good growth and contribution towards job creation and capacity building. However, for Indian telecom manufacturing to exponentially grow it is pertinent that the government focus and support shifts to increasing production volumes, of which exports will be a key engine. There is a cost disadvantage (of 4-6%) in exporting finished goods from India compared to other manufacturing nations across the globe. The Ministry of Electronics & Information Technology (MeitY) has recently announced a Production Linked Incentive Scheme (PLI) for large scale electronics manufacturing industry, which is mainly focused on mobile phones and related components and does not include telecom network equipment. COAI has requested Department of Telecommunications to bring similar Production Linked Incentive Scheme for telecom network equipment manufacturers as well.

28. E-Commerce Related Policies and Guidelines:

Department of Consumer Affairs issued the Draft “E-Commerce Guidelines for consumer protection 2019” for stakeholders’ inputs. Apart from the liabilities of both E-commerce players and sellers, Consumer Grievance Redressal Procedure were also part of the draft guidelines. COAI has also submitted its inputs to the Department of Consumer Affairs on these draft guidelines. Major submissions include the followings:

a. To remove the provisions where an E-commerce entity shall be held guilty of contributory or secondary liability if it makes an assurance vouching for the authenticity of the goods sold on its market place; or if it guarantees that goods are authentic, as it is not consistent with law and seeks to impose liabilities without any clear indication of the nature of activity that would draw such liability.
b. Instead of e-commerce entity being mandated to disclose terms with the seller, their websites should be required to display the customer facing and governing policies of return, refund, exchange, warranty/guarantee, delivery/shipment, mode of payments, grievance redressal mechanism etc.

c. To remove the provisions where intermediary, need to exercise “due diligence” over information/goods that are illegal, counterfeit, misleading, paedophilic, defamatory, deceptive or misleading. The e-commerce entity cannot police or adjudicate on IPR related disputes.

d. To avoid any overlap with Consumer Protection Act, 2019 in the issues to prevent unfair trade practices and protect consumer interests.

29. Operationalization of Indian Counterfeited Device Restriction (ICDR) System:

The system operated and maintained by Mobile Standards Alliance of India (MSAI) to prohibit import of mobile phones with duplicate, fake and non-genuine IMEI, has been replaced by DoT with a new system i.e. Indian Counterfeited Device Restriction System (ICDR) developed by C-DoT. This system has been operationalized on pilot basis w.e.f. January 2020 for registration and generation of IMEI certificates by following due procedure for import of mobile phones in India. Although, the new system is user friendly and also operating at a good speed, however, COAI made a representation to DoT regarding the certain provisions/technical capabilities that need to be ensured to enhance the utility and smooth functioning of the new ICDR system.

30. The Personal Data Protection Bill, 2019:

The Joint Parliamentary Committee (JPC) sought comments from stakeholders on “The Personal Data Protection Bill, 2019”. COAI submitted that there are aspects of the Bill that not only deviate from the principles laid down by the Hon’ble Supreme Court but also from global standards.

COAI submitted that it will be critical for the draft Bill to resolve the ambiguities in interpretation of what constitutes personal data and sensitive personal data. Anonymized and non-personal data should be completely outside the scope of the Bill and the requirement of registration for Significant Data Fiduciaries should be done away with. COAI highlighted that the Bill should allow Data Fiduciary to determine what reasonable purposes would constitute and that the Bill should adopt an approach which recognizes that age-verification mechanisms can only be implemented through ‘all reasonable steps’ by data fiduciaries. COAI urged that the data fiduciary should not be held responsible for the accuracy of the data principal's data. COAI also recommended that the nature and scope of the right to be forgotten, including the enforcement measures should be specified in the Bill. COAI supported the formation of Data Protection Authority (DPA) and advocated that the Bill should promote transparency and independence of the DPA by amending provisions related to the selection committee to include a judicial and technical member, composition of DPA etc. COAI emphasised the need to make DPA financially autonomous and recommended that the powers & functions of DPA should include consultation with sectoral regulators so that it can leverage domain expertise. COAI highlighted that Code of practices should emerge from the industry, rather than being prescribed as onerous regulations. COAI recommended that a minimum period of 24 months be made available for applicability of any particular rule/standards/code of practice from the date of its notification. COAI suggested that the Bill be revised to remove the criminal penalties and civil penalties should be applied only in connection with the business carried out in India – not worldwide turnover of the defaulting company. COAI also recommended that a clear and unambiguous exemption of data of foreign nationals is imperative for the large scale off-shore processing industry in India as
this will help to avoid jurisdictional conflicts with authorities in another jurisdiction such as the European Union.

COAI urged the JPC to consider its recommendations in order to ensure that the data protection law works for consumers, businesses and the economy at large.

31. “The proposed formation and rules on Central Consumer Protection Authority (CCPA)” under the Consumer Protection Act 2019:

The Department of Consumer Affairs sought comments from the stakeholders on proposed formation and rules on Central Consumer Protection Authority (CCPA) under the Consumer Protection Act 2019 (The Act).

COAI highlighted certain discrepancies such as conflict of jurisdiction between parallel adjudicatory bodies, independence of regulators, and other such issues surrounding the formation of CCPA, with respect to the Telecommunications Sector which must be addressed in order to ensure a smooth implementation of the Act. COAI submitted that the telecommunication sector already has a Sector Regulator, TRAI, which is extensively dealing with role and functions assigned to CCPA under the Consumer Protection Act, viz, to protect, promote and enforce the rights of consumers as a class, prevent violation of consumers rights under this Act, to prevent unfair trade practices, ensure no false or misleading advertisements are made etc.

COAI submitted that the role and functions of the Central Authority would overlap into the functions that are already being carried out by TRAI and could create an overlap of jurisdictions and possibly conflicting regulations. The TRAI being a sector specific regulator is also charged with the responsibility of consumer protection and is best placed to carry out these functions. COAI suggested that where more than one regulator exists, governments should develop institutional arrangements that minimise any overlap of responsibilities and avoid duplication of agencies with similar responsibilities as this can help ensure regulatory consistency, avoid uncertainty, and reduce resource cost for both government and businesses of multiple regulators looking at the same matter.

COAI also recommended that consultation should also take place with various sectoral regulators including TRAI to ensure that there is no overlap or conflict in jurisdictions thus ensuring both certainty in the framework as also optimal use of resources.

32. Refund of accumulated credits / adjustment of excess GST Credit:

The GST, amounting to above Rs. 35,000 Crores, against capital expenditure and Government payments incurred by the telecom industry is stuck as input credit with the Government, which the industry is not able to utilize. This has led to an imbalance, as on one hand, the TSPs’ money is blocked as GST input credit and on the other, the operators are making LF, SUC and spectrum deferred payments.

The industry would continue to incur capex for expansion of wireless and wireline broadband services including roll out of 5G which would result in further accumulation of Input Tax Credit.

COAI has requested the Government to facilitate greater utilization of the accumulated GST input tax credit of TSPs as it will be of big relief to the industry. Therefore, once the Government allows the adjustment of unutilized input tax credit against the Government spectrum dues then the same will help to ease the cash flow and drive investments in the Industry.

The payment of GST under reverse charge mechanism on both spectrum payout (auction/liberalization) and LF/SUC related payments in cash is leading to a cascading cash flow impact.

a. Exempt regulatory levies (LF, SUC, spectrum repayment) from payment of GST under reverse charge mechanism go forward – this would ensure that further accumulation of credit on this account would cease.
b. Refund should be allowed for accumulated credit to avoid cascading of taxes, which is a fundamental principle of any value added tax prevalent in the VAT regime and in most of the developed international jurisdiction.

c. Adjustment of the spectrum charges against the blocked GST i.e. utilize the excess GST credit as payment towards the Telecom operator’s liability towards spectrum auction and License Fee/SUC

33. **Exempt GST on payments to Government, e.g. Spectrum payment, license fees, Spectrum usage charge, Right of Way charges:**

a. Applicability of GST on regulatory levies is leading to tax cascading, since telecom operators are unable to fully utilize input tax credit paid on such regulatory levies. This first involves a cash payment of tax with corresponding credit against output liability. It is revenue neutral for the Government but involves large blocked working capital for the industry, given that a high credit pool that already exists. Given the precarious fiscal state of the industry, the telecom service providers are not in a position to carry this heavy burden of such cash blockage, nor can they bear the avoidable cost of funds for this blockage.

b. Internationally VAT/GST are not applicable on government services since they are regarded as a non-economic activity or sovereign functions that are outside the ambit of tax. For instance, in the European Union, as per the VAT Directive, bodies governed by public law are not taxable persons in respect of activities/transactions in which they engage as public authorities.

c. In line with the international practice, we requested that payment of regulatory levies made by telecom operators should be exempted from tax under GST. Regulatory levies were made liable to indirect tax, effective 1 April 2016 only, prior to which no tax was applied on such payments/charges.

d. Exemption of telecom regulatory levies from payment of GST would ease overall working capital burden on telecom operators and would also ease cases of accumulated credits. The said activity will also be revenue neutral from the perspective of the Government. GST under reverse charge is payable on all regulatory payments to the Government.

34. **GST - Blockage of GST Credit:**

Members are facing the issue of blockage of GST credit by tax authorities due to mismatches between GSTR2A and GSTR 3B. This may result in cash pay-out in our next GSTR 3B returns.

The Central Government has issued Notification No. 49/2019-Central Tax, which restricts to avail the ITC (Input Tax Credit) in respect of invoices/debit notes not uploaded by suppliers to 20% and event further brought down to 10% of the eligible credit available in respect of invoices/debit notes uploaded by suppliers which are appearing in GSTR-2A (Online input tax register).

Representation is being made to the Hon’ble Finance Minister as well as to the GST council informing that credit blocking to be withdrawn and the credit should be released for utilization.

Telecom industry is already facing challenge of accumulation of GST credits and in such circumstances, if it starts paying GST in cash due to blockage by tax authorities then it would accentuate the problem of accumulation of credit.
35. **Exemption from IGST levied and collected as customs duty on import of ships and vessels into India, on a temporary basis, for supply of services:**

For the purpose of supplying a service, there is a need for import of goods, aircrafts, ships and vessels on temporary basis into India. Such instances include import of ships for laying or repairing of undersea cables, import of rigs and ancillary equipment into India for a specified term.

On import of such ships or vessels on temporary basis into India, for supply of services liable to GST, double taxation arises.

(a) GST is levied for the first time, when IGST (as customs duty) is levied on the value of the ships and vessels when imported on temporary basis into India.

(b) Second time, on the supply of cable laying or cable repairing service, IGST leviable at 18%.

Representations were made to the Government requesting the undersea cable system that involve huge capital outlay is generally setup by the consortium of the telecom services providers and suitable notification to be issued for exemption. Notification is being issued by the Ministry of Finance.

36. **GST - E-Invoicing from the Portal:**

Representation regarding exemption to telecom industry under new E-invoicing system being introduced w.e.f. October 01, 2020.

Telecom industry generates above 20 lakhs taxable B2B invoices in a month. Further, the invoices raised to B2C customers run in crores. Further, other taxable documents like credit notes, debit notes, invoices for intra-company transactions are in addition to the above which are also huge in number.

GST Council in its 39th meeting held on March 14, 2020, has extended exemptions to various industries including Banking, Insurance, Financial Institutions, Goods Transport Agencies, etc. from e-invoicing system.

Representation made to MoF requesting that exemption from e-invoicing system should be provided to TSPs also.

37. **Clarity on issue of availability of input tax credit on critical telecom equipment:**

COAI had taken up the issue of ongoing enquiries by the MP state tax authorities against various telecom operators about eligibility of input tax credit on the equipment installed on telecommunication towers with a request that due process of law should be followed by the authorities before denying any input tax credit to the telecom operators.

Detailed submission was made with the request that due process of law should be followed by the MP State GST Authorities before denying the input tax credit to the telecom operators on the telecom equipment installed on telecom towers. Such equipment constitutes the very heart and core of any telecom network without which it is not possible to provide telecom services and denial of credit on such equipment would result in grave financial hardship to the telecom operators which will lead to a huge increase in cascading of input taxes, which is not the spirit of GST law.
38. Introduction of a scheme for deposit of monthly advance tax instead of tax deducted at source (TDS) for large companies:

Every year a taxpayer has to incur a lot of cost and efforts for getting the certificates under section 197 of Income Tax Act. Further these are based on estimations only. For obtaining 197 Certificate, online application in Form 13 needs to be filed, however, the window opens on 1st April for filing.

As per Citizen’s charter of the Income Tax Department, the application of Nil/Lower Tax should be disposed-off within 1 month. Generally, it takes about 2 months and the deductor applies the full rate of TDS thereby resulting into cash blockage of the taxpayer.

To provide convenience to taxpayers and to reduce costs and efforts of both taxpayers and tax authorities, it is recommended:

The large taxpayers are already subject to scrutiny by tax department. Hence, an amendment should be made in section 211 of the Act wherein large taxpayers should pay monthly instalment of advance tax instead being subject to tax deducted at source.

39. TDS on prepaid distributor margins/discounts from telecom operators (telcos):

TDS under section 194H on prepaid distributor margins/discounts from telecom operators.

Telcos sell telecom products in form of prepaid vouchers and talk time to its channel partners/distributors at discount. There has been continuous litigation on applicability of TDS on spread between maximum selling price and discounted price at which such products are sold to distributors. Telcos have long been contending that relationship between the telcos and distributors is on “Principal to Principal” and not “Principal to Agent” basis.

There is a strong case for issuance of a clarification that such discounts should not fall within the ambit of TDS provisions. However, if the government still wants to pursue this route for tax collection, it should introduce the TDS rate at 1% instead of the current 5%, which would be closer to the actual tax liability of distributors as margins earned by the distributors are low and they sustain only on volumes.
**40. Pre Budget-Recommendations 2020-21:**

Detailed representations with regard to key issues related to Direct and Indirect Taxes were sent to the Ministry of Finance, Ministry of Telecom, CII, FICCI, ASSOCHAM, etc.

Summary of key issues included in the representation is as follows:

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Issue</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Exemption from GST on Spectrum payment, license fees, Spectrum usage charge.</td>
<td>Given the huge burden of taxes and regulatory levies on telecom operators and considering the fragile state of their finances, special benefit should be provided to telecom operators in GST by way of exemption on regulatory payments of LF, SUC and spectrum assigned under auction.</td>
</tr>
<tr>
<td>2.</td>
<td>Refund of accumulated balance in Input Tax Credit</td>
<td>GST Act may be amended or notification be issued to allow refund of accumulated unutilized input tax credit as significant working capital being blocked under electronic credit ledger This should be refunded immediately to enhance cash flows of the Industry.</td>
</tr>
<tr>
<td>3.</td>
<td>Multiplicity of compliance, scrutiny, Audits, Investigations and Litigation for large Pan India service providers</td>
<td>Permit centralized registration and centralized audit procedure for ‘PAN India’ service providers.</td>
</tr>
<tr>
<td>4.</td>
<td>Credit on telecommunication towers and shelters</td>
<td>The exclusion of telecom towers from the definition of ‘plant and machinery’ in section 17(5) should be removed.</td>
</tr>
<tr>
<td>5.</td>
<td>Challenges in raising E-invoicing using portal prescribed by the GST Council</td>
<td>Telecom operators have multiple billing systems and invoices are generated and issued automatically through IT systems. Telecom operators be kept out of the e-invoicing/ authentication of invoices compliances. If it is to be applied for Telecom operators’ then at least 6-8 months be allowed after issue of notification on the process to be followed.</td>
</tr>
<tr>
<td>6.</td>
<td>Levy of entertainment tax through online media/internet implies multi fold compliance burden on the telecom service providers.</td>
<td>The scope of entertainment tax by local authorities should be restricted to the physical entry-based entertainment only.</td>
</tr>
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</table>
### Service Tax

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Issue</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Exemption in respect of levy of Service Tax on Right of Way permission granted by the Central Government/State Government and the development authorities</td>
<td>Scope of Exemption Notification No 1/2018 – Service Tax dated 30th November 2018 be extended to cover similar services by the Central/State Government Department and the other Development authority.</td>
</tr>
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</table>

### Direct Tax

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Issue</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Section 211 - Introduction of a scheme for deposit of monthly advance tax in case of large companies.</td>
<td>It is recommended that an amendment should be made in section 211 of the Act wherein large tax payers should pay monthly instalment of advance tax instead being subject to tax deducted at source.</td>
</tr>
<tr>
<td>2.</td>
<td>Section 115JAA - Removing limitation on time period of utilization of MAT credit</td>
<td>Limitation of 15 years period should be removed to provide respite to companies to utilize their accumulated MAT credit.</td>
</tr>
<tr>
<td>3.</td>
<td>Section 10(38)/ 115JB - Level playing on MAT on sale of listed equity shares</td>
<td>MAT rate on LTCG on listed equity shares may be lowered to a rate not exceeding 10%, being the maximum rate of tax on long term capital gains on STT-paid equity shares under regular provisions.</td>
</tr>
<tr>
<td>4.</td>
<td>Section 72A - Amendment in conditions of amalgamating companies</td>
<td>It is recommended to bring down the threshold of keeping 75% of book value of fixed assets to 25% for maximum 2 to 3 years’ time period. The relaxation of this condition would also facilitate conducing environment supporting digital India initiative of Government.</td>
</tr>
<tr>
<td>5.</td>
<td>Section 197 – Certificate for deduction at lower rate</td>
<td>Amendment to rule 28AA to provide that AO will not consider tax liabilities which have either been stayed by AO/appellate forums or for which adequate security is provided by the tax payer, for the purpose of processing LDC application.</td>
</tr>
<tr>
<td>6.</td>
<td>Interest expenditure incurred towards ‘right to use spectrum’, is allowable as revenue</td>
<td>An appropriate clarification should be issued to provide that the interest expenditure incurred towards ‘right to use spectrum’, is allowable as revenue u/s 36(1)(iii) read with Section 37(1).</td>
</tr>
<tr>
<td>7.</td>
<td>Section 79 - condition of change in shareholding</td>
<td>Clarification regarding testing of condition of change in shareholding at the immediate shareholder or the change of beneficial shareholding.</td>
</tr>
</tbody>
</table>

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1. COAI Petition challenging Maharashtra Tower Policy - Bombay High Court

**Background:**

A petition was filed challenging the regulations dated March 4, 2014 issued by Maharashtra Government for setting up of Cell phone towers in the State of Maharashtra.

**Key Takeaway/s:**

On April 08, 2019, COAI application seeking amendment of Petition for placing on record the RoW Rules, 2016 and Maharashtra Infrastructure Policy, 2018 was filed. On **July 10, 2019**, the Hon'ble Court extended the interim stay granted in 2014 and also allowed the amendment of the Petition sought by COAI.

2. COAI Appeal Challenging TRAI Direction on Wangiri Calls – TDSAT

**Background:**

COAI had filed an appeal challenging the TRAI direction dated September 07, 2012 on missed calls (Wangiri calls) originating from outside the country. TRAI vide its said direction asked all the service providers to inter alia ensure that no ISD facility is activated without the explicit consent of the subscriber. On November 2, 2012, the appeal was allowed as per the judgment of the Hon'ble Chairman of TDSAT. However, the Hon'ble Member pronounced a dissenting judgment on November 08, 2012.

**Key Takeaway/s:**

The industry had proactively taken steps to resolve the issue involved in the matter. COAI submitted to TRAI that the market of ISD calling and the consumer behaviour has undergone a tremendous change in the recent years and submitted a new proposal to TRAI and highlighted that the same will be more effective in addressing the relevant issue of Wangiri in comparison to the provision of ISD service only by explicit consent.

On **April 22, 2019**, TRAI issued a direction which noted the submissions and proposals made by COAI and withdrew its earlier direction dated September 07, 2012 (the impugned direction) which mandated that no ISD facility can be activated on pre-paid sim without the explicit consent of the subscriber. On **April 30, 2019**, Hon’ble TDSAT disposed of the Appeal as withdrawn in view of this Direction.
3. COAI Petition challenging Penalty for exceeding the EMF limits on shared sites (New Circular dated March 29, 2019 - 20 Lakhs) – TDSAT

Background:
COAI filed a Petition challenging the DoT Circular dated March 29, 2019 on EMF Penalty on Sharing Sites which lists out three scenarios for levy of penalty @20 Lakhs for non-compliance of EMF radiation norms. This circular penalized compliant BTSs in two scenarios despite the TDSAT judgment dated November 15, 2018 which has held that no innocent operators should be penalised in the name of collective responsibility. The petition sought setting aside of penalty amount of Rs. 20 Lacs and implementation of the TDSAT’s judgment

Key Takeway/s:
On August 13, 2019, Hon’ble TDSAT granted interim relief in the matter and directed DoT not to take any coercive steps for realization of its demands raised under penalty scheme dated March 29, 2019.

4. COAI Appeal in MCD Tower Matter – Delhi High Court

Background:
COAI, AUSPI and MTNL had filed a writ challenging MCD orders and praying inter alia quashing of MCD Office order dated November 20, 2003, Circular dated February 07, 2008 and office order dated April 08, 2010 as these impugned office Orders and the impugned terms and conditions are lacking in competence, ultra vires the DMC Act, unfair, unjust, unreasonable, arbitrary, without power and jurisdiction, unconstitutional and are violative of Petitioners' rights under Article 14, 19(1) (g) and 21 of the Constitution of India.

On January 30, 2017, a mediation settlement agreement with MCD was signed by Aircel, Airtel, Idea, Vodafone, RJio, Indus, ATC Viom, GTL Infra and Tower Vision.

Key Takeway/s:
On November 20, 2019, it was highlighted to the Hon’ble Court that there is an account reconciliation clause in settlement agreement dated January 30, 2017 and it was submitted that MCD is not reconciling the accounts with concerned TSPs/IP1s, and is sealing towers on regular basis. Hon'ble Court directed MCDs to reconcile accounts with TSPs/IP1s before the next date of hearing.
IMAGINE: A NEW CONNECTED WORLD
Intelligent | Immersive | Inventive

#IMC2019

Make in India Program

TSDSI - Standards and Thought Leadership

International Telecom Buyers meet

mHealth
7562 CXOs
319 Exhibitors
264 Startups
327 Speakers
53 Conference Sessions
800 Media Persons

Bigger than
MWC Los Angeles

60,000 sqm Total Area
56 use cases Live Demos

2515 Media Coverage
1742

5G

Footfall
75,278

The Knowledge Hub
Highest Media Visibility

Key Highlights

Stats
@exploreIMC

1.4 Billion impressions

30 Thousand Contributors
520 Million Reach
Inauguration

Inaugurated by

Shri Ravi Shankar Prasad
Minister of Telecommunications, Electronics & Information Technology,
Law & Justice, Government of India and attended by industry leaders, media,
analysts, academia, scientists and young professionals.

BK Das  
Distinguished Scientist  
ISRO

Nunzio Mirtillo  
Sr. Vice President &  
Head of Market Area  
South East Asia,  
Oceania & India  
Ericsson

Jim Whitehurst  
President and CEO  
Red Hat

Arun Kumar  
Chairman & CEO  
KPMG India

JAY CHEN  
CEO  
Huawei India
Leaders For Tomorrow

Vikas Agarwal
General Manager
OnePlus India

Vijay Shekhar Sharma
Founder and CEO
Paytm

Kunal Bahl
CEO
Snapdeal

Manu Kumar Jain
VP, Xiaomi and Managing Director,
Xiaomi India

Hari Om Rai
Co-founder and Chairman & MD
Lava International Limited

Leadership/CEOs Conclave
Indias Future Int elligent,
Immersive or Inventive?
Leadership/CEOs Conclave Imagine the Connected Future Technology redefining Connectivity

Leadership/CEOs Conclave - From Connectivity to Content

CIOs Conclave Transformational CIOs (Panel Discussion)

Transformational CIO #IMC2019
5G Live Use Cases & Announcements / Product Launches

56 live 5G use-cases, announcements & product launches took place at IMC 2019. Some featured announcements & showcases:

Ericsson and Qualcomm conducted the demo using a smartphone based on Snapdragon 855 Mobile Platform with Snapdragon X50 5G Modem-RF System and Ericsson’s 5G platform including 5G NR radio, RAN Compute products and 5G Evolved Packet Core. Ericsson and Qualcomm demonstrated India’s first 4K video streaming, video calling and 5G cloud-based gaming using the 5G commercial system in both sub-6 GHz and mmWave using 5G commercial devices, set up by Ericsson.

Cloud Based Immersive Gaming, Smart Factory & Remote Healthcare by Bharti Airtel

Qualcomm successfully completed first ever Live 5G video call in India on mmWave spectrum in collaboration with Ericsson

NavIC - Qualcomm in collaboration with Indian Space Research Organization (ISRO) announced support for India’s Regional Navigation Satellite System (IRNSS), Navigation with Indian Constellation (NavIC), in select chipset platforms across the company’s upcoming portfolio

OnePlus collaborated with Qualcomm Technologies Inc. and Ericsson to showcase the power of the much anticipated 5G technology

Redhat showcased Open Hybrid Cloud, Edge Computing, OpenStack Platform & Distributed Compute Nodes (DCN) in Virtualized RAN (vRAN).

HFCCL showcased IO Networks Made In India Wireless Connectivity Solution to Facilitate Stronger Wi-Fi Networks

STL showcases Stellar Fiber, Industry’s First Universal Fibre, Mantra Pods fully integrated solutions for smarter networks, 5G Edge Mantra, Data Center Solution for 5G and Lead 360 V2.0 Second Generation Hyperscale Network Modernization Solution

Alibaba - Whale Cloud launched the 5G Operation Map for India to support operators in different stages of the 5G network deployment. The map contains four key capabilities required for successful 5G monetization: center of intelligence to provide advanced data analytics and AI technology; Center of Operation focuses on comprehensive 5G network management; Center of Ecology builds a digital ecosystem for various industrial customers; Center of Value maximizes the value of ecosystem partners online and offline channels and customers


Huawei announced AI for the Smart City 2.0 and 5G + AI Smart City in addition to Future airports using 5G+AI technologies and Artificial Intelligence (AI) based Massive MIMO optimization technology.

Mavenir and Vodafone Idea have extended their partnership related to Telco’s Network-as-a-Platform that reaches distributed presence across all major industrial, commercial and services clusters in India. Vodafone Idea in partnership with Nokia to roll out software-defined networking in a wide area network (SD-WAN) services for start-ups and enterprises.

VVDN showcased Vermeo Card - Dual FPGA solution architecture for Telco Application and also presented fronthaul with ORAN over eCPRI (7-2 splitup option) - 5G fronthaul termination solution based on Xilinx FPGA.

Xilinx also showcased the industry’s first adaptable compute, network and storage accelerator aard built for any server or cloud

Honor announced the HONOR Vision Smart Screen that is positioned as the future of television, HONOR Vision features intelligent display, AI Camera and a flagship level WiFi Chipset.
As the world is battling COVID-19, COAI led conversations around key issues and recommendations on behalf of the Telecom sector since the start of the pandemic and the subsequent lockdown. COAI played a decisive role towards steering communication on behalf of the telcos - presenting an industry consensus view to the Government on crucial issues like network collaboration amongst telcos during COVID-19 requirement for Work From Home issues like slower data speed, data consumption, need for robust telecom infrastructure, spectrum and bandwidth issues and the need for additional spectrum, curfew passes, tower maintenance, backend support among others.

Media Outreach: Media was updated with the latest developments via statements, responses to the queries which resulted in huge coverage across the country and in international media.

COAI’s opinion along with the initiatives by telecom companies were captured in national and international media like The Economic Times, Hindustan times, Business Standard, Dainik Jagran, Dainik Bhaskar, Radio France, ITV London, China Global Television Network among others. Social media communication was also done parallelly ensuing the all the platforms are sharing relevant information.

NEW DELHI: With the government imposing 21-day lockdown to tackle coronavirus spread, industry body COAI on Wednesday urged mobile consumers to use data networks responsibly, so that critical services can run smoothly on communications infrastructure.

COAI’s appeal to public comes at a time when data usage has surged nearly 30 per cent over the last few days in the wake of lockdowns, work-from-home and social distancing measures adopted to contain the spread of coronavirus.

P. M. Narendra Modi on Tuesday announced a complete lockdown for 21 days in an unprecedented move to halt the spread of the pandemic. Soon after the announcement, the Centre said all roads, rail and air services will remain suspended during this period. COVID-19 has claimed 9 lives in the country and over 556 persons being affected by the viral infection. Fear are also mounting that more could be hit as the global coronavirus toll inches towards 17,000.

"We are asking people for responsible usage of network...to avoid any trivial use of Internet and networks...that remote working, online education, digital healthcare, payments and other critical services can run smoothly and uninterrupted," Cellular Operators’ Association of India (COAI) Director General, Rajan Mathews said.

Mobile users can also do their bit by choosing to time their use of online activities during off-peak hours, say early morning or late evening, he said.

Mathews said there has been a 20-30 per cent increase in data demand just in the last few days, as states and Union Territories imposed lockdowns, and took measures to encourage social distancing and Work From Home to check the spread of coronavirus. It is pertinent to mention here that video streaming platforms like Netflix and social networking giant Facebook are reducing bit rates for videos on their platforms as part of their efforts to help mitigate mobile and broadband network congestion. Netflix said it would reduce traffic on telecommunications networks by 25 per cent while maintaining the quality of service for users in India.

Facebook said it would temporarily reduce bit rates for videos on its platform and Instagram in India.

Companies like Amazon Prime Video are also temporarily lowering bit rates – a measure of how much data is being transferred - to ease pressure on telecom network infrastructure.

The move by these firms came after COAI wrote to the government suggesting platforms like Netflix and social networking giant Facebook are reducing bit rates for videos on their platforms as part of their efforts to help mitigate mobile and broadband network congestion. Netflix said it would reduce traffic on telecommunications networks by 25 per cent while maintaining the quality of service for users in India. Facebook said it would temporarily reduce bit rates for videos on its platform and Instagram in India.

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Telecom Regulator Urged to Allow Delay in Report Filing

COAI seeks at least six weeks more to submit quarterly, monthly reports

Mountzur Abbas

New Delhi: Telecom carriers have urged the sector regulator to offer additional monthly and quarterly filing of reports for at least six weeks from the deadline, in view of the nationwide lockdown to arrest the spread of coronavirus.

In a letter dated March 26 to Telecom Regulatory Authority of India (TRAI) Chairman RS Sharma, seen by ET, Cellular Operators Association of India (COAI) requested that its members be given additional time to submit reports of at least six weeks, from the deadline, to file the monthly and quarterly reports which are due for submission in April 2020.

COAI represents private telecom giants Airtel, Reliance Jio and Vodafone-Idea.

The letter comes amid a 21-day national lockdown since Monday following which the telecom companies have asked most of its staff to stay indoors and work from home due to the coronavirus pandemic.

"Regular daily operations of telecom service operators have been impacted with minimal staff manning the requirements," Rajiv B Mathews, director-general of COAI, said in the letter.

Telcos are required to submit multiple data sheets and reports to Trai as part of regulatory compliance requirements. These include reporting of their tariff packs as well as inactive or suspended subscribers, as part of the regulator's revocation list.

"In the present crisis, there is immense strain on the human resources of the operators as they are grappling with the operational losses arising from the Covid-19 outbreak on one hand, while also trying to fulfill the reporting obligations on the other hand," Mathews said in the letter.

The telecom regulator has simplified filing of reports in the wake of the ongoing pandemic. However, Mathews said the filing process has already started and asked for a two-week extension of the deadline for Telcos to report.

"COAI has already submitted data till March 15, while COAI members will be submitting data for the period of March 16 to March 31. Telcos' staff are working from home due to the lockdown, and there are no functional call centers," Mathews said.

Mathews also requested that the deadline for submission of the regulatory data for the first quarter of 2020 be extended to June 30, 2020.

"We are requesting the deadline for submission of the monthly traffic data in the first quarter be extended to June 15, 2020," Mathews said.

Mathews also requested that the deadline for submission of the regulatory data for the first quarter of 2020 be extended to June 30, 2020.

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UNION BUDGET

Telecom industry body, COAI, lauded the government for a progressive and forward looking budget and commitment towards India becoming a $5 trillion economy.

The Budget 2020-21, that includes enabling an aspirational India, through major fundamental structural reforms targeted at fostering healthcare, education, skill development and ensuring economic development for all. The Hon’ble Finance Minister Smt. Nirmala Sitharaman emphasized on country’s growth and Digital inclusion will hinge on advanced technologies such as AI, Robotics, Machine Learning, Analytics, among others, which essentially relies on telecom infrastructure.

The Budget proposed that the New India will be driven by innovations, AI and computing where data will be the new oil and other significant initiatives such as linking of 1 lakh gram panchayat to the Bharat Net program by this year and an allocation of INR 6,000 crore in this regard.

Media Outreach- COAI’s statement was covered in major publications like PTI, IANS, The Economic Times, The Financial Express, among others.
Financial Health of the Telecom Sector – Post Budget Views

COAI has been championing for the much-needed financial relief and impetus to the telecom industry in its post-budget review, given the importance of the sector in driving inclusive growth in India.

Issues pertaining to the telecom infrastructure, regulatory levies and taxes, appeared in leading financial newspapers including The Economic Times, Business Standard, Mint, additionally, leading online news portals such as ETTelecom.com, ETCIO, The New Indian Express, etc. carried the messaging.

Mobile Network Boosters

Wireless Monitoring Organisation, field unit of WPC Wing and Telecom operators have been raising awareness regarding mobile signal repeaters. These repeaters lead to increased incidences of call drops and lower data speeds thus degrading service experience for the majority of customers in the area. The objective was to take down illegal mobile signal repeaters installed by individuals. With the raids conducted in Delhi, 32 illegal repeaters were removed and 42 notices were given to remove the identified ones with immediate effect. Heavy fines may be imposed on owners of several premises and notices were served to the rest.

Raid were conducted by DoT teams with the support of relevant authorities and mobile operators. These raids were conducted in several locations across Delhi, Mumbai, Gujarat, and Hyderabad among others.

Media outreach- Coverage was garnered in The Financial Express, Indian Express, Hindustan, Lokmat, The Hindu, ET Telecom, Communication Today, tele.net etc.
Further in this regard, COAI had written to e-commerce players like Amazon, Rediff, Snapdeal, Flipkart etc. to stop the sale of these devices on their platforms. These e-commerce players while understanding the sensitivity of the matter, supported the request by removing these items from their platforms.

DoT cracks down on illegal mobile signal repeaters in Delhi raids

The Wireless Monitoring Organisation of the Department of Telecommunications (DoT) conducted raids in several locations across Delhi to take down illegal mobile signal repeaters, the Cellular Operators Association of India (COAI) said in a statement.

"Mobile operators, who are making record investments in purchasing spectrum and rolling out network infrastructure, are confronting this challenge and have called out the authorities to crack down on these installations and take strict action," COAI said.

These illegal equipment interfere with mobile networks, impact signal quality and legitimate network experience in the telecom area. Mobile operators, who are making record investments in purchasing spectrum and rolling out network equipment, are confronting this challenge and have called out the authorities to crack down on these installations and take strict action.

The locations where raids were conducted include both residential and commercial establishments in areas such as Laxmi Nagar, Dallouganj, Greater Kailash, Indrapuram, Adarsh Nagar, Model Town, Patel Nagar, South Extension, Chandi Chowk, Anand Vihar, Sant Nagar, Lajpat Nagar, Rajouri Garden, Civil Lines, Ashok Vihar and Rajinder Nagar. The identified locations also include Gurgaon and Noida.

Raid was also conducted in Karol Bagh where such illegal equipment is being sold," the statement said, adding that with this exercise in Delhi, 32 illegal repeaters were removed and 46 notices were given to remove identified ones with immediate effect.

Further in this regard, COAI had written to e-commerce players like Amazon, Rediff, Snapdeal, Flipkart etc. to stop the sale of these devices on their platforms. These e-commerce players while understanding the sensitivity of the matter, supported the request by removing these items from their platforms.
BBMP-OFC Cut in Bengaluru

Bengaluru was at potential blackout of its digital services across-the-board as BBMP (Bruhat Bengaluru Mahanagara Palike) had resorted to large-scale cutting of Optical Fibre Cable. This random cutting of OFC across city without any prior intimation could have led to huge outages and inconvenience to the citizens in densely populated areas. While the move was supported by some citizen groups and environmentalists, others suffered due to the sudden outages.

BBMP also issued an arbitrary order stopping work and cancelling all OFC permissions to telecom operators which disrupted the critical digital infrastructure and hurt businesses. COAI urged the authority to allow the restoration of impacted work immediately and to have clear and stable RoW Policy.

A joint letter by COAI and TAIPA was written to Additional Chief Secretary, Urban Development Department of Government of Karnataka, seeking their intervention in the matter. A meeting with the Hon’ble Chief Minister of Karnataka was also organized to discuss the concern.

Media Outreach: A 360 degree communication approach was adopted for highlighting this issue to the media. A media statement was issued at the initial phase of the crisis to provide the industry’s opinion. The media statement & press release got more than 40 coverage in all leading mainlines and regionals. The news was carried by PTI and coverage by local dailies including, The New Indian Express, The Hindu along with online news portals, ET Telecom, Business Standard, Outlook India, The Week etc.
Year End Stories

As the year was ending, it was necessary to highlight the overall developments in the policy ecosystem and how the year had been in-toto, for the telecom sector. The government has envisioned to cover every “uncovered village” in a year so that no part of the country is left without communication services. There were a few highlights of the year like TRAI’s consultation paper on review of IUC, Government’s announcement on 5G spectrum auction, Hon’ble Supreme Court’s ruling on AGR matter etc.

Yet another tumultuous year ahead for telecom industry

Move towards digitisation, AGR issue will be key challenges

Government’s vision to cover every “uncovered village” in a year is laudable and commendable. The telecom industry, on its part, has been equally proactive and has made significant strides in this direction. However, the key challenge remains to ensure that all parts of the country are covered and that there is seamless connectivity across all regions.

Media Outreach - Through opinion pieces, media interactions and standalone stories, we were able to bring forth the current financial health of the sector and the policies that directly impact it or can mitigate/manage it. Coverage was garnered in the ET Telecom, Business World Dainik Bhaskar, Voice and Data etc.
Workshop on Broadband Readiness Index

Department of Telecommunications (DoT), as a part of its nationwide State Government outreach programme to achieve goals of National Digital Communications Policy 2018, concluded its first chapter of awareness workshop with Southern State Authorities (Karnataka, Andhra Pradesh, Telangana, Kerala, Tamil Nadu, Puducherry, A&N Island and Lakshadweep Island). The workshop discussed about Broadband Readiness Index (BRI) for states, Right of Way issues, implementation and utilisation of BharatNet, connectivity to uncovered villages, issues of alleged Electromagnetic Field (EMF) Emission from mobile towers and role of DoT LSA in States/UTs in implementation of various programs of DoT and coordination with State Authorities.

In order to strengthen Department work with State/UTs on telecom issues, it was informed that for co-ordination, monitoring and implementation of projects, DoT units (LSAs) works closely with the State Authorities & Telecom Industry. The States/UTs were urged to form State Level Co-ordination Committee on Telecom matters with the participation of LSA for all telecom related matters.

On the sidelines of pricing problem insufficient spectrum, and quantum issue the 5G rollouts are likely to be delayed for at least five years.
Mobile Tower Fraud

It has been brought to the notice of TRAI that some companies / agencies / individuals are fraudulently asking public to deposit money in their personal/companies account as Government Tax under Telecom Act for leasing their premises for installation of mobile towers. These companies / agencies / individuals become unreachable after collection of money. They are also issuing fake ‘No Objection Certificates / Permissions’ for the Installation of Tower purportedly issued by Ministry of Communications and Information Technology. TRAI while issuing a clarification with no involvement in any such activity, also requested telcos to initiate awareness measures.

Fraudsters Sell Fake Telecom Towers to the Gullible

Bulk of the agents are making telephonic calls and seeking electronic transfer of cash.
COAI Knowledge Series

The objective of the Knowledge Series is to update the media on issues pertaining to the telecom sector. Two rounds of Knowledge Series were conducted by COAI over the last one year and the initiative was well received by the media. The topics covered were: Financial Issues in Telecom Sector and Demystifying mobile broadband experience.

- On financial issues in the telecom sector - COAI seeks clear roadmap for resolution of issues plaguing telecom sector

COAI organized an interactive session with media and had a discussion on Telecom Sector. COAI said “the new government post elections should set out a clear roadmap to ease the burden of levies on the telecom sector, and issues including a cut in license fee and spectrum charges should be taken up at the earliest, preferably in 6-9 months' timeframe. COAI ruled that revenue continues to remain under pressure for the industry saddled with high debt, and for most players, the earnings before interest, tax, depreciation and amortization or EBITDA generated “is not enough to meet the interest expenses”.

This was covered widely by the media houses like PTI, The Financial Express, Deccan Herald, DNA etc.

- Joint session with OpenSignal on Demystifying mobile broadband experience. Availability and Speeds in India. The report highlighted that India is among top 5 countries with 4G capabilities.
AGM 2019 and High Level Leaders' Panel Discussion

COAI hosted Annual General Body Meeting 2019, where the New Chairman and Vice Chairman were announced. The AGM was followed by a High Level Leaders Panel Discussion which was attended by dignitaries like Shri Anshu Prakash, DoT, Shri S.K. Gupta, TRAI, and other industry leaders. The news was covered by PTI Bhasha and further covered in leading regional publications such as The Economic Times Hindi, Business Standard Hindi. Additionally, it was picked by ET Telecom, Business Standard, The Times of India, etc.
COAI Press Releases and Statements

- **COAI and ETSI sign MoU to foster a closer co-operation on Telecom Standardization**

Acknowledging the role of standards, especially in the context of emerging technologies and technologies of the future and the need to collaborate and work in partnership with different types of organizations around the world, COAI and ETSI signed an MoU to work and collaborate on areas of mutual interest.

- **COAI’s statement on formation of Committee of Secretaries**

COAI welcomes the move by the government to set up the CoS to look into the matter of the financial distress and relief for Telcos. It also suggested that the CoS should perhaps take a two pronged approach - an immediate relief package to ensure Operator’s financial viability in the light of the SC Order and requirement to pay in 3 months (Phase 1), and the longer term relief to ensure long term viability and financial sustainability and health of the sector.
COAI's statement on the Hon'ble Supreme Court's judgement on definition of AGR

COAI and the Telecom sector expressed its deep disappointment on the Hon'ble Supreme Court's judgment on the definition of Adjusted Gross Revenue (AGR) which will have an impact of over INR 92,000 crore on the industry. The telecom EBITDA continues to contract, while the interest expense of the Industry continues to increase. The Supreme Court's judgment is the last straw in contributing to financial distress and it remains to be seen whether the industry will be able to recover from this setback.
COAI welcomed the fact that the government recognises the financial distress of the telecom sector and has provided relief in the form of deferments of spectrum payments. COAI also requested the government to consider the vexing issue of AGR and address the anomaly of continuing with the previous legacy issue of revenue share and License Fees and SUC when spectrum has already been paid for up front.

Telcos get 2-yr breather to pay for spectrum

Telcos to provide bank guarantee of revised annual instalment

Slew Of Reforms & Relief Measures In Bid To Revive Economy

Govt hands Rs 42,000cr lifeline to struggling telecom firms
COAI highlighted the regulations as a welcome step in the right direction as it has always maintained that in a CPP (Calling Party Pays) format that we follow in India, there should always be cost based IUC, in line with global practice. We look forward to continuing support from the government and regulator to address the severe financial stress in the telecom sector.

**TRAI's regulations on wireless to wireless Domestic Call Termination Charges**

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**Relief for Voda Idea, Airtel as TRAI defers scrapping IUC levy**

TRAI will continue to earn a revenue of Rs 6 per minute on every mobile call they receive on their networks till Dec 31, 2020.

**TRAI puts off zero-IUC regime by a year to Jan 2021**


**Airtel, Vodafone Idea get some relief**

TRAI defers zero fee plan on call links

UNEON 03 ATENTION: Reliance Jio Chairman Mukesh Ambani and Airtel Chairman Scott Mittal.

**MOVE ON FLOOR RATES**

**TELECOM regulator Trai on Tuesday initiated a consultation to fix minimum or floor rates for voice calls in India and a move away from the call terminated at 3 pais per minute.

TRAI said its new floor rates will be decided by another regulator.

The government has also taken the initiative to reduce the cost of terminating calls in India, which has been a major issue for telecom operators.

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COAI supported the Consultation Paper issued by TRAI on floor pricing. Tariff correction is necessary for improving the financial health of the industry. The only option available is for the Regulator to intervene and correct the anomalous pricing situation prevailing in the market place. The regulation on this issue by the Regulator will ensure that the Telecom industry remains healthy and robust, there is orderly competition and above all, the resources are available with TSP’s to enhance QoS and expansion of networks to achieve the vision of Digital India.

COAI's statement on TRAI's Consultation Paper on Floor Price

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COAI expressed its disappointment the Hon’ble Supreme Court's order dismissing the industry's review petition of AGR matter. The Supreme Court's dismissal of the review petition is the last straw in contributing to financial distress and it remains to be seen whether the industry will be able to recover from this setback.

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With the Supreme Court dismissing the petition by telecom firms to review its October 24 order on definition of adjusted gross revenue (AGR), industry and experts said that the decision would hit the fund-raising and investment capability of service providers, leading to adverse impact on the NDA government's flagship Digital India initiative.

Expressing disappointment over the decision, Bharti Airtel on Thursday said it was evaluating the possibility of filing a curative petition. The firm added that the money required to pay the interest and penalties on the pending dues, could instead be used for serving the Digital India initiative.

Prashant Sinhal, global technology, media and telecommunications (emerging markets) leader at EY told The Hindu, "This is a big blow... while there is still some hope with the option of filing a curative petition, the sooner the uncertainty is positively resolved, the better it is for the sector.

Mr. Sinhal added that the sector needed funds for upcoming technologies such as 5G and this decision would impact telecom companies' fund raising and investment capabilities. "This will also impact the larger telecom value chain, including tower firms, say analysts."

Dimming prospects: The payment will impact the larger value chain, including tower firms, say analysts.

"The sector, which is currently reeling under a debt of Rs 74,997 crore, is a key contributor to the Indian economy... The sector is already facing heavy taxes and levies in the range of 25% to 50%, which are globally the highest," Rajani S. Mathews, director general, Cellular Operators Association of India said. "The Supreme Court's dismissal of the review petition is the last straw in contributing to financial distress and it remains to be seen whether the industry will be able to recover from this setback. The added pressure on the sector will also adversely impact Prime Minister Narendra Modi's vision of Digital India," he added.
COAI hosted 3GPP and GCF meetings on global telecom standards and device certifications

COAI along with Indian Friends of 3GPP (IF3) hosted the meetings of working groups of 3GPP and Global Certification Forum (GCF) in Hyderabad during 13th January to 17th January. These meetings provide a good platform and exposure to Indian Government officials, academia and other key stakeholders in India to participate in the discussions on development of global telecom standards and certification requirements for the deployment of 5G globally. COAI along with IF3 and the 5G India Forum (5GIF) are playing a key role and putting significant efforts in bringing global standards discussions to India.

5G India Forum at the ITU meeting submits cutting edge reporting of new 5G radio technologies

The final report of the 5G India Forum Independent Evaluation Group (5GIF IEG) states that operators are empowering consumers with the power to check and opt for technologies that meet a minimum technical performance requirement in an era of 5G spectrum. A significant outcome of this effort was that an industry-grade simulator that was built for the purpose of evaluation and that can now be leveraged for future technology studies in India.
COAI's statement on Call Data Record

This was carried by news wire agency PTI and further published in The Hindustan Times, The Economic Times, Mint, Hindustan Times, etc. Additionally, it was also covered in leading portals such as The Economic Times, Business Standard, etc.

Events Participation

• **5G Huddle**: Wireless World Research Forum organised a 5G Huddle conference in different parts of the world annually. TSDSI partnered with WWRF hosted the 7th Annual 5G Huddle in New Delhi on 5-6 February 2020, along with Broadband India Forum and ITU APT Foundation of India. Theme of this edition was 5G as a Catalyst for Digital Transformation. It looked at the progress that has been made in the world's 5G journey, and more importantly the challenges that still remain in order for the long-term benefits of this truly transformational technology to be felt across all areas of society.
• **Voice & Data**: Telecom Leadership Forum: The focus was the importance of infrastructure that will propel the next generation network and will fuel the business growth for the enterprises. Government has to lay down the full proof plan to fuel the growth of telecom story, with no more job cuts, more into training & developments, new tax laws, industry friendly credit policy and many more.

• **National Broadband Mission**: Centre Government launched the National Broadband Mission to provide broadband access to all villages by 2022. It was launched by Telecom Minister Shri Ravi Shankar Prasad. The programme is a part of NDCP 2018.

• The workshop explored current issues in affordable access to communication and examines new trends, technologies, business models, and regulations that could contribute to affordable connectivity for all. The session also explored the latest issues in access technology, economics, business models, and regulations affecting affordable access.

• **The 18th Star Nite Awards 2019** amplified this development further by inviting industry stalwarts, who have been a witness to this trend to speak on topics around digital disruptions while also awarding the top vendors from the industry in different categories who have managed to digitally catapult their businesses to success.
Voice & Data: India 5G Evolution: Voice & Data, Cybermedia, held an event on India 5G Evolution with business leaders from the telecom and government representatives. Pradeep Gupta, CMD, Cybermedia welcomed the guests. Sukanta Dey, Strategic Advisor & Group COO, Informo Global Pte Ltd, gave the opening address. Keynote speakers were Aruna Sundararajan, Former Secretary, DoT, Government of India; Rajan Mathews, Director General, COAI and Jitendra Singh, Senior Director, Government Affairs, India & South Asia, Qualcomm India.

ET Telecom 5G Congress: The focus was the 5G technology on the back of ultra-low latency communications is poised to bring the next wave of telecom disruption with an array of cross-industry applications becoming mainstream.
Media Visibility Snapshot 2019-20

Telecom Regulator Urged to Allow Delay in Report Filing

Murtazir Abbas

New Delhi: Telecom carriers have urged the sector regulator to defer mandatory monthly and quarterly reports at least by six weeks from the due dates, in the wake of the nationwide lockdown to arrest the spread of coronavirus.

In a letter dated March 30 to Telcom Regulator Authority of India (Trai) Chairman Vinod Kumar, several Cellular Operators Association of India (COAI) representatives pointed out that the lockdown had postponed the operations of telecom service providers, leading to a delay in the rollout of broadband services.

The carriers cited a series of issues, including the need for service providers to ensure the safety of their employees and the need to maintain business continuity.

"It is extremely difficult for our members to submit various monthly and quarterly reports on the dotted line during this novel coronavirus pandemic. Meanwhile, the regulatory body's performance against customer care services (CeD) in the wake of the ongoing crisis is also a concern," the Trai said in the letter.

"Telcos are required to submit various data and reports to Trai on a regular basis," the Trai said.

YET ANOTHER TUMULTUOUS YEAR AHEAD FOR TELECOM INDUSTRY

In recent months, the telecom sector has faced several challenges, including the impact of the COVID-19 pandemic on business operations, the increasing demand for high-speed connectivity, and the need to invest in new technologies.

However, the industry remains committed to providing high-quality services to its customers. The government has also taken several steps to support the sector, including the announcement of various relief measures.

"We are confident that the industry will continue to grow and thrive in the coming years," a telecom executive said.

Media Visibility Snapshot 2019-20

COAI seeks at least six weeks to submit quarterly, monthly reports.

Murtazir Abbas

No respite for the telecom sector

Arvind Mohan

In our consideration of the situation, we are likely to recommend:

- That the broadcasting regulator, TRAI, should loosen the rules for the audio-visual content industry, including the relaxation of the 60-second rule for broadcast networks.
- That the rules for audio-visual content should be made more transparent and inclusive, allowing for a wider range of voices and perspectives to be heard.
- That the broadcasting regulator should consider the impact of the current regulations on the overall audio-visual content ecosystem, including the number of channels, the types of content, and the diversity of voices.

Rajshree Bhatt, President, COAI

Today's Quiz

Timely resolution of AGR issue is important for telecom companies as it would provide certainty in decision-making.

COAI will continue to engage with the Telecom Department on outstanding issues despite the government's move towards deregulation.

"We are committed to working with the government to ensure a smooth transition towards deregulation," a COAI representative said.

COAI Director General Rajan Mathews

The telecom sector continues to face several challenges, including the impact of the COVID-19 pandemic on business operations, the increasing demand for high-speed connectivity, and the need to invest in new technologies.

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Price of 5G spectrum in India 30-40% higher than global rates: COAI

New Delhi: A day after the government announced its intention to hold auction market in the current fiscal year, industry body COAI said that the recommended price of 5G spectrum in India is 30-40% higher than the rates in markets like South Korea and the US.

“Majority of our operators have indicated that 5G spectrum is too prohibitively expensive and that their balance sheets can’t afford this,” Cellular Operators Association of India (COAI) Director General, Rajan Mathews said.

On Monday, the government made it clear that it plans to go ahead with 5G spectrum auction, excluding for 4G radiowaves in the current calendar year. The new Telecom Minister Ravi Shankar Prasad also set a deadline of 180 days for the auction process.

“Majority of our operators believe that the spectrum price for 5G is too prohibitively expensive and is incompatible in the context of local and international standards and exists in other markets like South Korea and the US,” Mathews said.

He further said that incentives should be built into the spectrum pricing so that 5G services in the country will also be able to serve socio-economic needs.

On Sunday, the newly appointed Chairman of COAI and chief executive officer (CEO) of India's largest telecom operator Vodafone Idea, Dolph Shroff, had appealed to the government to ensure that 5G spectrum bidding is not driven by “unreasonable prices” and should be made available to all players at reasonable prices such that more investments are directed towards enhancing network capacity and capabilities.”

The Telecom Regulatory Authority of India (TRAI) has already recommended auction of about 637 MHz of telecom spectrum, including those for 5G services, at an estimated total revenue of Rs 49,000 crore, but the financially stressed industry has continued that prices are unaffordable.

Last month, telecom operator Bharti Airtel said that base price spectrum auction recommended by the regulator is “unrealistic” and unaffordable, had urged the government to review the price of radiowaves to act for the strategy of an aggressive 5G plan.

Towards making India 5G-ready by 2020

An aspirational budget, but without relief for a key component industry

The Union Budget 2023-24 is a clear indication of the government’s intentions to bring India into the 5G era in the next few years. The government has set a target to ensure that India is 5G-ready by 2025, which is an achievable goal.

However, the budgetary measures do not provide any direct relief or incentives for the telecom sector, which is crucial in facilitating the 5G rollout. The telecom sector has been facing several challenges, including spectrum licensing, network infrastructure, and other operational issues.

The main concern for the telecom industry is the high cost of spectrum acquisition. The budgetary measures do not address this issue directly.

The budgetary measures are aimed at promoting the overall economy and digital infrastructure, but they do not provide any specific measures to support the telecom sector.

In conclusion, while the Union Budget 2023-24 is an aspirational document, it does not provide any direct relief or incentives for the telecom sector, which is crucial in facilitating the 5G rollout. The telecom industry needs specific measures to support its growth and ensure India’s 5G readiness.

Rajan M Mathews
Director General, COAI
Cellular Operators Association of India

TELCS STRUGGLING TO SURVIVE CASH CRUNCH

With the government announcing its intention to hold a 5G spectrum auction in the current fiscal year, the telecom industry is facing a cash crunch.

Telecom operators are under pressure to raise cash to meet the high cost of spectrum acquisition. The government has set a deadline of 180 days for the auction process, which could catch many operators off guard.

The industry is also facing the challenge of increasing network costs, which are driven by the high cost of spectrum acquisition.

In conclusion, the telecom industry is facing a cash crunch due to the high cost of spectrum acquisition and increasing network costs. The government needs to provide specific measures to support the industry in this period of uncertainty.

Rajan M Mathews
Director General, COAI
Cellular Operators Association of India

Ask OTT players to ease network load: COAI to govt

The Cellular Operators Association of India (COAI) has urged the government to take steps to reduce the network load on telecom operators, especially during peak hours.

COAI has stated that the network load on telecom operators is critical during peak hours. The association has stated that all service providers should act in line with the network management guidelines.

In conclusion, the government needs to take steps to reduce the network load on telecom operators, especially during peak hours. This will help to ensure that the network remains stable and accessible for all users.

Rajan M Mathews
Director General, COAI
Cellular Operators Association of India
To achieve the total #telecom license fee of 4%, the USO contribution should immediately be reduced to 3% with the ultimate objective of doing away with the levy in the next 2-3 years in line with the recommendations of the telecom regulator.

@DoT_India

COAI urges cut in USO fee to 3%, telecom license fee to 4%...

The reductions in these levies will act as incentives for operators to expand the network in rural areas.

@P Kejriwal_economics@economist.com

11:14 AM - Aug 21, 2019 - Twitter Web App

COAI

To Indian telecom operators and the Wireless Monitoring Organisation, DoT conducted raids on several locations across India to take down illegal!! mobile signal repeaters installed by individuals. @DoT_India @ETTelecom @telecomTalk

At Telecom, raids conducted raids across Delhi-NCR to take down illegal mobile... According to a statement by the COAI, the DoT, along with the DoT, has seized illegal mobile cell towers and arrested individuals involved in installing these towers.

@telecomtalk@timesnownews.com

9:00 AM - Jun 10, 2019 - Twitter for Android

COAI

#India has a population of 1.3 billion people. Of this 1.2 Billion already have #Aadharcards, 1.2 Billion have #phones, and 560 million are #internet users. A national #communication network is emerging. @GoogleIndia @PMOIndia @ericsson @TRAI @amitabhk87

COAI urges #Subscribers for responsible usage of data, so that critical services can run smoothly & uninterrupted on #Communications infrastructure. #COVID19 #IndiaFightsCoronavirus #StayHome #StaySafe #21DayLockdown #WeAreInThisTogether #EndsFightCovid19 #HErsNECVID19

COAI urges subscribers for responsible usage of data, so that critical services can run smoothly & uninterrupted on communications infrastructure.

Shri Anshu Prakash, Secretary, DoT India at India Mobile Congress 2019

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1,684 likes • 18 Oct 2019

COAI salutes the unsung #network heroes working on the frontlines for us so we can #StaySafe and #StayConnected! We are also thankful to the #government for their unwavering support during these challenging times. @PMOIndia @DoT_India @GoI_MeIT @rsprasad @TRAI @mygovindia #COVID19 Pandemic is a Global Battle.

COAI

12:55 PM - Aug 30, 2020 - Twitter Web App

#SmartCities function on interconnected technologies that can store, transfer, and analyze data. That's the reason why the High-Speed Fiber is at the heart of the city, and it's crucial to maintain the infrastructure and keep it1

#SmartCities function on interconnected technologies that can store, transfer, and analyze data. That's the reason why the High-Speed Fiber is at the heart of the city, and it's crucial to maintain the infrastructure and keep it...
About COAI

COAI was constituted in 1995 as a registered, non-governmental society. The Association is dedicated to the advancement of modern communication through the establishment of world-class mobile infrastructure, products and services and to delivering the benefits of innovative and affordable mobile communication services to the people of India.

Industry Policy

COAI has emerged as the official voice of the Indian telecom industry that interacts directly with ministries, policy makers, regulators, financial institutions and technical bodies. It provides a forum for discussion and exchange of ideas between these bodies and the service providers, who share a common interest in the development of mobile telephony in the country.

Telecom Issues

COAI collaborates with other industry associations such as CII, FICCI, ASSOCHAM, GSMA, ISPAI, ICA, etc., with the objective of presenting an industry consensus to the Government on crucial issues related to the growth and development of the Indian telecom industry.

New Technologies

COAI is determined to encourage the confluence of technologies to facilitate the move towards complete convergence in communications as this could greatly help India mitigate the problems of low fixed line penetration and help realize country’s vision of becoming an Information Society.

Thought Leadership

COAI aims to dispense information and spread awareness among the national and international entities and consumers on issues pertaining to service quality and other value-added services provided by the operators to their subscribers.
Management

The COAI secretariat comprises of a Director General at the helm of two Deputy Director Generals to support him. There are six departments of teams in the association that ensure that COAI is one of the most credible and reputed industry bodies, solely dedicated towards advancement of mobile communication.

There are currently 22 people working in the COAI secretariat bringing talent and skills from various areas of work, such as regulatory, legal, finance, public affairs, technology and infrastructure.

RAVINDER TAKKAR
Chairman

Ravinder Takkar is the Managing Director and Chief Executive Officer (MD & CEO) of Vodafone Idea Limited, India’s leading telecom service provider, effective 19th August 2019.

Ravinder’s professional experience of 25+ years spans across cultures and geographies, building a strong track record in the field of business strategy, business planning and development in the ICT sector. Associated with Vodafone Group since 1994, he has worked in leadership positions with several operating companies of Vodafone, in multiple markets across the world.

He has been closely associated with the growth and evolution of Indian telecom since Vodafone Group’s entry in 2007. He held a number of senior roles in strategy and business development and was also the CEO of Vodafone’s Enterprise business in India. He has also served as Director on the Board of erstwhile Vodafone India Limited.

AJAI PURI
Vice Chairman

Ajai Puri is the Chief Operating Officer (India and South Asia) at Bharti Airtel Limited. He has been with Bharti Airtel since 2004 and has held several senior leadership positions including Director – Market Operations, Director and CEO – DTH, and CEO – Kolkata & West Bengal, Odisha. Prior to joining Bharti Airtel, Mr. Puri served as the Business Head - Foods at Cargill Foods India. He began his career with VST India Ltd, an associate company of British American Tobacco (UK).

RAJAN S. MATHEWS
Director General

Prior to joining COAI as DG, Rajan served as COO of US Operations and Corp. CFO and VP of Telargo Inc. (a Joint Venture of NTT DoCoMo), overseeing all of the company's Strategic Planning, Business Development, Financial, Treasury, Accounting, Tax, Administrative and Human Resource functions.
COAI Structure

General Body

Executive Council

Director General & Secretariat

Committees

Legal Committee
Technology Committee
Telecom Infrastructure Committee
Finance & Commercial Committee
Regulatory Committee
Strategy & Policy Committee

Working Groups and Special Projects

ACT (Apex Advisory Council for Telecom in India)
EMF Portal Working Group
Sub-Group on Reduction in Regulatory levies
The COAI team includes dynamic, experienced and highly skilled professionals with a must-do attitude and remarkable proficiency in their respective verticals. Lean and yet highly competent, the Secretariat is committed towards the successful implementation of every activity undertaken towards the cause of the industry.

Regular coordination with the Government, the Regulator, relevant State Government departments, and other stakeholders, have established appreciation and recognition of the Secretariat’s efficiency and professional prowess, both within, and outside the industry.

This year Mr. Deepak Kumar Gupta, Deputy Manager joined COAI adding to the Secretariat’s strength.

The Secretariat is thankful to all its members and highly appreciates their valuable guidance, mentoring and constant support towards its efficient functioning and productivity.