

**Presentation by
Association of Competitive Telecom Operators (ACTO)**

**ACTO's Recommendations on Work From Home
(WFH) Requirements
Under the OSP Guidelines**

DoT, Sanchar Bhawan, New Delhi
16th September, 2020

COVID19 & IT/ITES- WFH – The new norm for IT-BPO

- Increased demand for data as work from home (WFH) became a reality especially serving several mission critical industries;
- Accelerated investment in VPN solutions, Cloud adoption on the rise as business continuity is the key;
- In **March 2020**- DoT relaxed WFH requirements for OSP's; **now** extended until December 31, 2020;
- Top Indian IT firms continue to work remotely with 95% of its staff working from home;
- Post COVID19- Major IT/ITES companies WFH to be the norm.

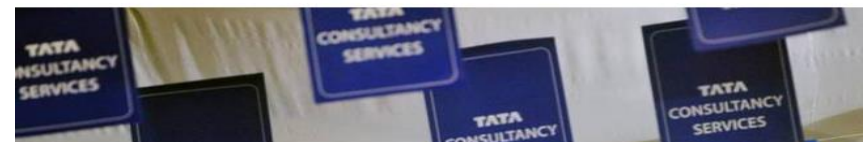
During COVID-19 majority of employees in Indian IT/BPO segment are Working from Home-

- TCS-99%
- Infosys- 95%
- Wipro-95%
- HCL- 96%
- Tech Mahindra- 95%

Post-COVID, 75% of 4.5 lakh TCS employees to permanently work from home by '25; from 20%

Post-coronavirus: New model called 25/25 will require far less office space. Decision came after the firm briskly moved 90% of its workforce to an operating model called Secure Borderless Work Spaces

Sonal Khetarpal | April 30, 2020 | Updated 12:30 IST



ACTO members primarily provide enterprise data services to majority of the fortune 500MNC's including the Indian IT/BPO segment.

Source: <https://content.techgig.com/work-fromhome-headcount-of-tcs-infosys-wipro-and-other-it-majors/articleshow/77312794.cms>

Work From Home relaxations have wide ranging benefits

The current relaxations benefit stakeholders across society

- Employees
 - Health safety, transport and time savings, convenience
- Employers
 - Business continuity, potential infra cost savings, employee health
- Government
 - Sustained productivity, COVID safety, pollution reduction
- Majority of IT-BPM workforce benefitting from relaxation of WFH regulations during COVID
- India's led with agility as WFH is becoming the global norm
- Extending WFH improvements supports long term planning and competitiveness of this critical industry

COVID-19 related relaxations in OSP WFH requirements

Ref. to OSP guidelines	Existing guidelines	Relaxation due to COVID-19
Chapter IV Clause 5(i)	Agreement and 1 Crore per location bank guarantee for OSP's with work from home.	Requirement exempted
Chapter IV Clause 5(ii)	Interconnection through secured PPVPN with predefined locations of home agent and OSP centre. In addition, OSP may use own security mechanism.	OSP provisioned secured VPN using static/dynamic IP address with predefined locations
Chapter IV Clause 5(iii) & (iv)	<ol style="list-style-type: none"> 1. Permission from DOT along with all details 2. All logs including IP addresses assigned to home agent to be maintained for one year 3. Authority have right for periodic inspection 	<ol style="list-style-type: none"> 1. Intimation along with all details 2. No change 3. No change
Chapter III Clause 1(4)	OSP to use IP address registered in the name of Indian entity and traceable to physical location	No change

Rationale to make the relaxations permanent

- 1. International WFH guidelines are more flexible and agile**
 - No separate permission is needed globally to Work from Home
 - VPN connectivity and compliances requirements are flexible
- 2. Security Deposit and Agreement requirements for WFH drive up cost and reduce agility**
 - A light touch framework promotes global competitiveness
 - Requirements are especially burdensome for small contact centers and discourage business growth
- 3. Enabling alternatives to Static IP PPVPN can broaden reach, accessibility, and reduce costs**
 - Dynamic IP VPN has enabled seamless secure transition to WFH
 - Technology neutral, secure connectivity and CDRs and call logs for DOT/LEA audit doesn't require Static IP
- 4. Prior Intimation (vs Permission) drives agility without compromising OSP obligations**
 - Prior intimation under prescribed format serves all needful DOT requirement
 - Local LSA maintains power to act on issues or violations
- 5. TRAI Recommendation and NDCP 2018 also broadly support such relaxations**

ACTO's Recommendations on WFH

- **Extend WFH Relaxations into OSP permanent Guidelines**
 - Eliminate requirement of security deposit(BG) and agreement
 - Permit secured VPN using dynamic IP addresses
 - Permit WFH on prior intimation (with details provided to LSAs)
 - Relax per-location penalties to support compliance with reasonable penalties

Extension of WFH relaxations support a more efficient and competitive industry.



Thank you !!

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