

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

**ACTO's Presentation to Committee under
Chairmanship of DG-T for the Reform to Reduce
the Compliance Burden on the TSPs**

DoT, Sanchar Bhawan, New Delhi
25th February, 2022

Introduction

- ❖ ACTO is an industry association, registered under Societies Registration Act, 1860.
- ❖ Our members are engaged in the business of data and internet telephony services provided to enterprise customers which include, amongst others, multi-cited corporations, Indian BPO/KPO, outsourcing and ITES sector operating global networks under various appropriate telecom licenses including NLD, ILD, ISP and Access Service.
- ❖ ACTO is committed to further India's pro-competitive policies and to partner closely with Ministry of Communications & Information Technology, Ministry of Finance and other Ministries, Government Bodies to enhance the stakeholder's engagement with the specific needs of the enterprise segment.

- ❖ Our members:



Agenda

- Introduction
- Periodic Inspection/ Security Audit by LSAs
- Submission of Reports to LSAs
- Remote Access (RA) inspection by LSAs

Periodic Inspection/Security Audit by LSAs

Issue in brief:

- **Duplication:** Periodic inspections/ security audits conducted by various LSAs on the same TSP under the same License.
- **Similar Information** sought by all LSA units in inspections/ security audits
- **Differing Interpretations/ Views:** Adds to regulatory uncertainty and lack of predictability.

ACTO's Requests:

- License inspection/Audit should be conducted at central level at the registered office or a designated office.
- It will make the periodic inspection/ security audit process simplified, mutually convenient, efficient and effective.
- The same report can be shared with other LSAs.

Submission of Reports to LSAs

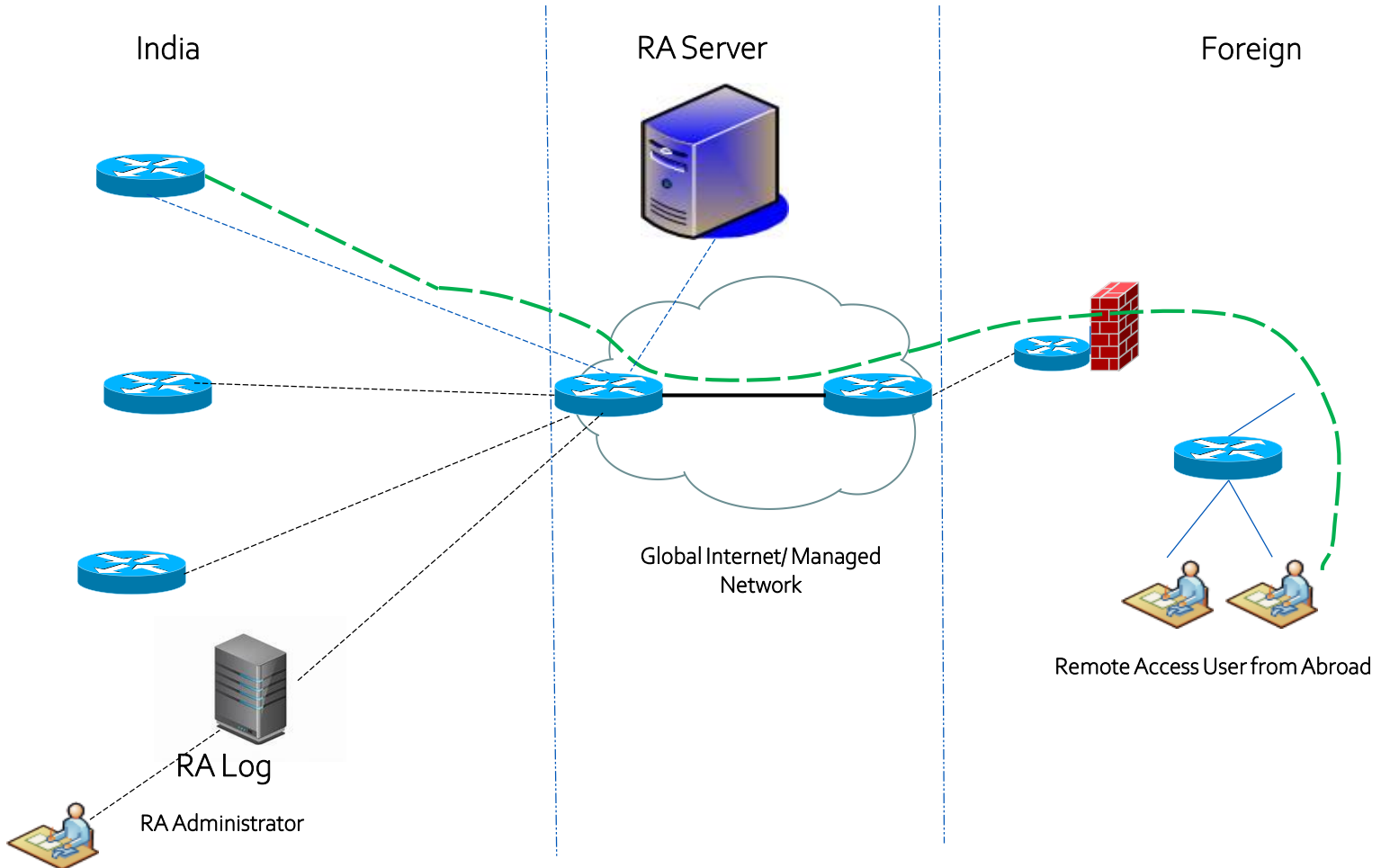
Issue in brief:

- **Duplication of Reports:** Same reports submitted to LSA, DOT (HQ) and others agencies.
- **Non-uniform Format:** Same information asked in different formats.
- **Undefined Periodicity:** Report submission dates not predefined.

ACTO's Requests:

- ACTO suggests reviewing all the reports/submissions required by DOT/LSA keeping uniform format and defined periodicity.
- All the submissions should be online to a common depository in line with the system available in NSW under DIPT.
- Digitally signed document should be accepted & encouraged.

Typical Remote Access Architecture



Remote Access (RA) inspection by LSAs

Issue in brief:

- **Onerous RA approval process:** Resulting in inordinate delays.
- **Delayed Network Expansion:** RA is critical for new nodes as well as O&M activity for existing nodes.
- **Already Approved RA System:** Also requires inspection by LSAs

ACTO's Requests:

- Simplify the current process of prior approval to intimation basis.
- No further inspection/approval in case new node/site is added to the approved RA system.
- Allow licensee to commence services while demonstrating all required compliances within a specified period.



Thank you !!

Association of Competitive Telecom Operators (ACTO)

Cabin No 40, Second Floor B-1/632. Janakpuri East, West Delhi 110058

Mob: 9899242273

e-mail: info@acto.in web: www.acto.in