GOVERNMENT OF ASSAM
INFORMATION TECHNOLOGY DEPARTMENT
ASSAM SECRETARIAT, BLOCK-C, 2ND FLOOR
DISPUR, GUWAHATI-781006

No: IT.176/2009/312 Dated Dispur, the 27th January, 2017

From : Shri. Fakhruddin Ahmed, ACS
Joint Secretary to the Government of Assam,
Information Technology Department

To : The Principal Advisor,
Networks Spectrum & Licensing
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan, Jawahar lal Nehru Marg
Old Minto Road, New Delhi-110002

Sub : Submission of comments.

Ref. : TRAI office earlier letter 1) No. 103-3/2016-NSL-II Dtd-25-11-2016
2) No. 103-3/2016-NSL-II Dtd-07-12-2016

Sir,

With reference to the subject and letter under reference, I am directed to enclose herewith the comments/views on TRAI Consultation Paper "Spectrum, Roaming & QoS related requirements in Machine-to-Machine (M2M) Communications" issued on 18th October,2016 for the state of Assam for favour of your kind information and necessary action.

Encl.: As stated above.

Yours faithfully,

Joint Secretary to the Government of Assam
Information Technology Department

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Copy to:

1. P.S to the Additional Chief Secretary to the Govt. of Assam, Information Technology Department for favour of kind appraisal of Additional Chief Secretary.
2. P.S. to the Commissioner & Secretary to the Govt. of Assam, Information Technology Department for kind appraisal of Commissioner & Secretary.
3. P.S. to Secretary to the Govt. of Assam, Information Technology Department for kind appraisal of Commissioner & Secretary.
4. The Head, SeMT, Assam for information.

By Order etc.

Joint Secretary to the Government of Assam.
Information Technology Department.

TRAI has identified 8 different industry verticals in which IoT/M2M devices can operate. It is also suggested a collaborative approach to form a common architecture to facilitate interoperability and communicate over several networks: WiFi, Bluetooth, cellular networks, Local and Wide Area Networks using different spectrum bands mentioned in the consultation paper. This regulation will help reducing the complexity, cost saving, developing standards and cyber security issues etc. TRAI plans to regulate M2M/IoT communication, the following inputs may be noted for the same.

1. **Regulation of TSPs providing M2M/IoT service under UL:** Amendment of existing TSP licenses is a good initiative. At the same time new licenses should be provided to some other competent parties to support large scale deployment for smart cities.

2. **Regulating M2M service providers/non-telco based providers under MVNO license**: The licenses may be provided under MVNO and need to be ensured to be operative in the rural segment and 8 identified verticals.

3. **Identifying spectrum bands for M2M/IoT**: Though, few frequency band is mentioned for M2M/IoT, there is a need to clearly identify the bands as well as the quantum of spectrum for M2M communication at this stage, so as to promote ecosystem development in those bands.

4. **By determining tariff for national/international roaming**: Devices and some automobile manufacturers use SIM-supported method to connect to the Internet need national/international roaming. Tariff(s) should be suggested segment wise for the use of M2M devices that shall require national and international roaming.

5. **Assuring security of data**: Different IoT/M2M services will have different requirements for security. A separate regulation is required for device security. Amendment and new rules need to be generated in terms of IT Act and cyber security policy in India considering its legal aspects.
6. **Ensuring user privacy**: IoT/M2M devices can also pose a threat to user privacy since some devices are installed in intimate spaces like homes, cars, wearables, etc. Securing such data from unauthorized use and attacks will be a key concern, so rules of encryption, privacy policy should also adhere as per the IT Act and cyber security policy in India.
7. **Incentives for start-up**: There should be clear provision of incentives / supports for the start-up companies to work on various aspects in M2M/ToT ecosystem such as applications development, new protocol and standards etc.

(Jahid Ahmed)
Sr. Consultant-IM

22/12/16

(Head, Secy T)