

From: policy@internetfreedom.in

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Cc: prateek@internetfreedom.in, Policy@internetfreedom.in

Sent: Thursday, September 28, 2023 3:49:05 PM

Subject: Submission of counter comments on TRAI's consultation on regulation and selective banning of online services

Dear sir,

The Internet Freedom Foundation ("IFF") is a registered charitable trust which advocates to protect and advance constitutional freedoms in a digital society. We aim to champion privacy protections, digital security, and individual freedoms in the digital age.

We are writing to you to offer our counter comments on the consultation paper on 'Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services'. We would like to reiterate our stance against the regulation, licensing, and selective banning of online communication services.

We remain at your disposal should you wish to discuss the matter any further.

Kind regards,

Prateek Waghre,
Policy Director,
Internet Freedom Foundation



By Email

To,
Shri Akhilesh Kumar Trivedi,
Advisor (Networks, Spectrum and Licensing), TRAI
Email: advmn@traigov.in

Date: September 28, 2023

IFF/2023/041

Sub: IFF's counter comments on Regulation and Selective Banning of Online Services

Dear sir,

1. Internet Freedom Foundation ('IFF') is a registered charitable trust which advocates for the digital rights of Indians. Our mission is to ensure the growth of digitisation with fundamental rights guaranteed under the Constitution of India. We work across a wide range of issues with expertise in internet shutdowns, digital access and free expression.
2. We are writing to you to offer our inputs on the consultation paper on 'Regulatory Mechanism for Over-The-Top ("OTT") Communication Services, and Selective Banning of OTT Services' on which counter comments have been invited till September 29, 2023. We would like to reiterate our stance against the regulation, licensing, and selective banning of online communication services ("OCS"). The persistence of telecom service providers ("TSPs") to use the phrase "OTT" and the insistence on classifying them based on their understanding of these services over-simplifies and diminishes the complex and diverse functionality performed by them. TSPs that are demanding their 'fair share' either fail to take into account or acknowledge the inevitable threats to net neutrality that will be created due to a revenue sharing model. It is disappointing to note that some stakeholders have completely disregarded the negative consequences that regulation of OCS may have on user choice, the ability to remain anonymous, end-to-end encryption ("E2EE"), and market innovation. Lastly, we still believe that there exists a lack of adequate evidence and clear statutory basis for TRAI to take this matter up for consultation.

We look forward to your response. We remain at your disposal should you wish to discuss the matter any further.

Kind Regards,
Prateek Waghre
Policy Director,
Internet Freedom Foundation
prateek@internetfreedom.in

IFF's counter comments on **Regulation and Selective Banning of Online Services**

Internet Freedom Foundation



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Internet Freedom Foundation ("IFF") is a registered charitable trust which advocates for the digital rights of Indians. Our mission is to ensure the growth of digitisation with democratic rights guaranteed under the Constitution of India..



Tejasi Panjiar is the Associate Policy Counsel at the Internet Freedom Foundation. She did her Post-graduation in Public Policy at O. P. Jindal Global University. She pursued her undergraduate course in Political Science (Hons.) from Kamala Nehru College, University of Delhi. Her work at IFF covers issues of privacy and data protection, platform governance, cyber security, and telecom policy.



Prateek Waghre is the Policy Director at IFF. A technologist-turned-public policy professional, Prateek has spent nearly a decade in the CDN industry as a consultant and product manager. Since moving to public policy, his research work has focused on a number of areas such as internet shutdowns, information disorder in the information ecosystem, and the governance of digital communication networks/ social media in India. Prateek is also an alumnus of the U.S. State Department's International Visitor Leadership Program (IVLP) on Disinformation in the Quad.

We would like to thank Associate Policy Counsel, Disha Verma, Policy Intern, Saharsh Panjwani and Digital Literacy Intern, Purvai Dwivedi for their assistance and IFF staffer Ashlesh Biradar for his design and graphic contributions.



Detailed counter comments on the ‘OTT Regulation and Selective Banning’ consultation paper

1. Net Neutrality

- 1.1. TSPs have been demanding their “fair share” from online content providers (such as Netflix and Hotstar), on the grounds that their capital investment in developing infrastructure and technology for telecommunication services help generate traffic to online content providers. Several TSPs suggest developing a revenue sharing model wherein online services generating large traffic should become liable to contribute to the former’s infrastructural costs. A few TSPs suggested identifying a ‘large traffic generator’ using the following parameters: a particular percentage threshold (for example 5%) of the total bandwidth occupation/ traffic during the overall peak hour, revenue generated, or a certain minimum number of active subscribers.
- 1.2. Classifying an online service as a ‘large traffic generator’ and consequently charging them a usage fee accordingly may negatively impact user viewing experience. The Dialogue, in their comments, shared how ISPs in South Korea are “*choosing not to host higher quality content (4K movies, shows etc.) as they cost significant traffic. The policy [in South Korea] resultantly has impacted the consumers adversely by limiting their choices and decreasing the quality of service.*”¹ Moreover, the TSPs don’t specify the parameters for determining the percentage threshold of the total traffic or the criteria for determining the range of total revenue or active subscribers that is adequate for classifying as a large traffic generator.
- 1.3. Interestingly, the telcos and other stakeholders representing them also feel that the online services should pay the Government and contribute to the network development efforts undertaken by the latter. For instance, Reliance Jio stated that OCS provides should not be an exception and must “*also be required to comply with the financial obligations i.e. license fee obligations including USO levy as percentage of AGR and other levies, as per the Access services authorization under the Unified License, as part of the Same Service Same Rules regime and in order to maintain a level playing field [sic].*”² Stating similar arguments, the Cellular Operators Association of India (COAI) said that “*Despite the fact that OTT Players provide similar services as that of TSPs, they are not obligated for such levies [i.e. payment to Licence Fee, Spectrum Usage Charges*

¹ Ayush Tripathi, Shruti Shreya and Bhavya Birla, “Comments on TRAI Consultation Paper On Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services” submitted by the Dialogue. Available at: https://www.trai.gov.in/sites/default/files/The_Dialogue_04092023.pdf (Last accessed on September 14, 2023)

² Reliance Jio Infocomm Limited’s Comments on TRAI’s Consultation Paper on “Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services”. Available at: https://www.trai.gov.in/sites/default/files/Reliance_Jio_Infocomm_04092023.pdf (Last accessed on September 14, 2023)



and Universal Service Obligation Fund] *thus clearly violating the principles of a level-playing field.*"

- 1.4. The premise that OCS provides the same services and functions as telcos and that OCS, as a significant contributor to the economy, must also be obligated via a regulatory intervention to make capital investments towards infrastructure development lacks conceptual basis as no market failure that directly relates to OCS has been defined. The concern voiced by these stakeholders of telcos facing high levies and charges is one that cannot be denied, however levying similar charges on internet services will not reduce the monetary burden of telcos. It is also unfair to assume, without evidence, that internet services must be obligated to pay for developing infrastructure. Professor Barbara Van Schewick in their submission states that *"Closing the gap and increasing online digital participation remains a priority of the Indian government, with the Digital India Programme recently being funded again with 14,903 crore (~US \$1.7B) through 2026. In short, it is a government priority to get people in India using the internet even more. That's the exact opposite of what network fees do: By imposing a tax on certain services (e.g., OTT communications services or popular applications), network fees reduce the amount of network usage and the quality of services on the network."*
- 1.5. Some TSPs and other stakeholders even suggested categorising OCS above a certain identified threshold as "significant online communication services", akin to the "significant social media intermediary" classification as per IT Rules, 2021, and imposing higher regulatory obligations on them, including restricting contribution to network costs to significant online services.³ Much like IT Rules, 2021, wherein these categories brought a high level of government discretion in determining which platforms need to comply with what regulations, creation of such classification criteria and vague thresholds may enable the Union Government or the TSPs (depending upon who determines the threshold) to enforce discriminatory compliances.
- 1.6. In the European Union ("EU") led consultation on the "future of the electronic communications sector", which was held between February and May 2023, online content providers argued that apart from concerns surrounding net neutrality, costs born by online content providers are not necessarily traffic-sensitive, rendering the payments on the basis of the number of users or amount of traffic transmitted unjustified.⁴ We

³ Reliance Jio Infocomm Limited's Comments on TRAI's Consultation Paper on "Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services". Available at: https://www.trai.gov.in/sites/default/files/Reliance_Jio_Infocomm_04092023.pdf (Last accessed on September 14, 2023)

⁴ European Commission, "The future of the electronic communications sector and its infrastructure", Exploratory Consultation, February 23, 2023 to May 19, 2023, <https://digital-strategy.ec.europa.eu/en/consultations/future-electronic-communications-sector-and-its-infrastructure>; See also: "EU regulators group against big tech paying for telco infrastructure." Reuters, October 11, 2022, <https://www.reuters.com/business/media-telecom/eu-regulators-group-against-big-tech-paying-telco-infrastructure-2022-10-11/>

would also like to bring to the Authority’s attention the comments submitted by Stanford Law Professor Barbara Van Schewick, wherein she elaborately explained the two flawed assumptions used by TSPs to support network usage fees, i.e., ‘services generate traffic’ and ‘increased traffic leads to higher costs for internet service providers’.⁵ For instance, Professor Schewick explains that, “*Users pay their ISP to deliver traffic upstream and downstream, to and from the sites and services that the user chooses to use. The Indian user creates the traffic over a connection they paid to use.....Those seeking to force apps to pay ISPs incorrectly blame popular online services for sending traffic to end users.*”

- 1.7. Some TSPs have also, in their comments to TRAI, suggested principles for fair share determination such as a ‘regulated Fair share charge’ or a charge based on mutual commercial negotiations between the TSPs and OCS. TSPs justified this demand on the grounds that they witnessed no revenue growth despite high investment, whereas OCS witnessed high revenue growth despite no investments. Even if that claim is assumed to be accurate, there is no evidence indicating that OCS “steal” the profits of TSPs, impacting their revenue. Further, the suggested methods of categorising an application or services as “large traffic generators” and deciding the “fair and proportionate share/ contribution” are arbitrary and lack clarity, which may lead to such decisions being taken on a case-to-case basis.
- 1.8. In June 2023, we published an analysis to examine whether a growth in the use of online calling and messaging did in fact negatively impact telecom revenues in India.⁶ In our analysis, we found that the economic stress on telcos comes from the intense price competition they face due to the extremely low prices of their competitors. There was also no clear data on the extent to which investment was needed in the sector. Based on this analysis, we concluded that to pose regulation for OCS in the absence of even a credible correlation to economic losses of telecom companies - let alone causation - was a harmful public policy choice. In our view, implementing regulations that impose financial burdens on OCS is an unfounded and detrimental public policy approach. Rather than acting in the corporate interests of TSPs and online service providers, we urge TRAI’s to protect user rights and serve their best interests.
- 1.9. It was disappointing to note that TSPs refuted claims that fair share will violate net neutrality principles and lead to increased cost for users. We feel the need to reiterate

⁵ Prof. Barbara van Schewick, “Response to the Telecom Regulatory Authority of India’s Consultation on Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services”. Available at: https://www.trai.gov.in/sites/default/files/Barbara_Van_Schewick_06092023.pdf (Last accessed on September 14, 2023)

⁶ Tejasi Panjiar, Ishika Ray Chaudhuri, and Prateek Waghre, “A Public Brief on Demand for “Fair Share” and Regulation of OTT services by Telcos and Implications on Users”, Internet Freedom Foundation, June 12, 2023, https://content.internetfreedom.in/api/files/divco3ywedt9rpe/sce88gbwixr5ro4/fair_share_analysis_brief_1_zq0Mul6hrX.pdf.



that the continued presence of a free and open internet is contingent on not treating internet applications and services as value added or “over-the-top” services. Allowing TSPs to price these internet services based on the content they offer or the amount of traffic they generate will compromise the entire architecture of the internet itself.

- 1.10. Highlighting the risks of internet fragmentation and threat to net-neutrality, Consumer Unity & Trust Society (CUTS) International stated that, *“One of the risks with the proposed cost-sharing framework between OTT players and telcos, is differential pricing for different sets of consumers. TSPs may discriminate between OTT services that pay them and those that do not and block or slow the content of OTT players which do not enter into cost-sharing arrangements with them. This can impair consumer choice available to consumers for accessing services they desire.”*⁷
- 1.11. In 2016, TRAI released a watershed regulation on Differential Pricing for Data Services, barring TSPs from giving competitive advantages to certain websites or entities over others based on network fees and other favourable factors, thus safeguarding net neutrality. The fair share argument made by TSPs is merely a repackaged and renewed attempt to levy network fees and break net neutrality. We urge TRAI to not deviate from its earlier approach that was in favour of Net Neutrality principles, uphold and strengthen the spirit of the 2016 order, and continue to prevent TSPs from engaging in such rent-seeking behaviour.

2. Regulation and Licensing

- 2.1. Demands for the regulation and licensing of OCS (such as WhatsApp and Telegram) amongst TSPs have been justified by arguing that similar rules must be applied for offering similar services (for eg. voice calling or messaging) by different service providers. This “same service, same rules” argument is raised by traditional TSPs on the grounds of ensuring a level playing field and accountability of online services to balance national security, consumer interest, and privacy needs. This argument seems to be driven by an instinct to regulate the internet per se from the lens of TSPs rather than to satisfy any regulatory need. We urge TRAI to understand that the regulatory difference between TSPs and OCS do not require an intervention, especially because there are inherent structural and functional differences between the two.
- 2.2. Several TSPs also preferred the use of the term “OTT” services and suggested classification of such services as services providing communication facility (“OTT

⁷ Consumer Unity & Trust Society (CUTS) International’s Comments on TRAI’s Consultation Paper on “Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services”. Available at: https://www.trai.gov.in/sites/default/files/CUTS_International_01092023.pdf



Communication Services”) and services providing facilities other than communications (“Other OTT Services”). As already explained in our initial comments, OCS have complex and diverse functionalities which cannot be jacketed into a single, umbrella category. We would like to re-emphasise our opposition to the term “OTT”, which is an over-simplified term limiting the vibrant, innovative pace of applications and services. Because of this reductive and improper understanding, any classification of such services (by type of service offered, mode of offering service, number of subscribers, etc.) will be unable to reflect the complexities of services performing multiple functions.

- 2.3. Reliance Jio even suggested imposing equal financial obligations on OCS by firstly reducing levies or fees for the TSPs to encourage investment, and simultaneously permitting bi-lateral commercial deals between the TSPs and OCS. As highlighted by Internet & Mobile Association of India (IAMAI) in their comments, this approach completely ignores the fact that OCS have their *“own associated costs such as costs associated with content delivery networks and other forms of infrastructure, and users of OTT platforms already separately pay TSPs to use their network”*.⁸ Bharti Airtel even suggested licensing those OCS which provide services that TSPs may provide in the future, *“OTT communication services which are similar [services] should be considered under [the definition of OTT comms services]. Same/similar services should also cover services that will potentially be provided by TSPs in the future, as permissible under their licenses.”*⁹ We oppose the imposition of any such financial obligation on OSC which would hamper innovation and their monetary contribution to the Indian economy.¹⁰
- 2.4. Added operational costs for OCS may have a twofold effect: the OCS may recover the lost revenue from the user through increased subscription fees or in-app purchases; or it may drive smaller services out of the market altogether, killing innovation in this dynamic space. Either way, user autonomy, privacy, and comfort may be jeopardised to protect the profit margins of a few. We also believe that the suggested form of regulatory framework, where TSPs essentially have the power to tilt the playing field to favour one website/ application/ service or another, will inevitably lead to discrimination, non-level playing field, entry barriers, and increased compliance burden.
- 2.5. Further, the argument by TSPs that OCS do not have the same national security requirements, with respect to *“lawful interception, furnishing call details, providing*

⁸ “IAMAI Submission on TRAI CP on Regulatory Mechanism for OTT” submitted by the Internet and Mobile Association of India. Available at: https://www.trai.gov.in/sites/default/files/Internet_Mobile_Association_India_04092023.pdf (Last accessed on September 14, 2023)

⁹ Bharti Airtel Limited’s Response to TRAI Consultation on Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services. Available at: https://www.trai.gov.in/sites/default/files/Bharti_Airtel_04092023.pdf (Last accessed on September 14, 2023)

¹⁰ “Internet Society India Delhi Chapter’s comments on the TRAI Consultation Paper on Regulatory Framework for OTT Communication” submitted by Dr. Govind on behalf of ISOC. Available at: <https://www.trai.gov.in/sites/default/files/InternetSocietyIndiaDelhiChapter08012019.pdf> (Last accessed September 14, 2023)



traceable identity of the user of the communication, data / server localization etc.”, and thus need to be brought under similar regulatory conditions is extremely worrying. The extension of regulatory guidelines to OCS may have consequences in the form of weakening end-to-end-encryption, interception of messages, hampered ability to remain anonymous, increased compliance burden, entry/ exit barriers, and so on. The suggestion by some TSPs to remove ‘fictitious identities’ on internet applications and services and verify all such anonymous identities may have dire consequences.¹¹ This becomes even more concerning given that India’s recently enacted data protection law does not put into place any meaningful safeguards against overbroad surveillance. We thus urge TRAI to interrogate the premise, i.e. “OTTs” are direct technical/ functional substitutes of TSPs.

- 2.6. We are principally against bringing such services under the same or similar regulatory framework as TSPs. We believe that the premise largely relied upon in the consultation paper as well as some of the comments submitted by TSPs - i.e. internet services supposedly being direct substitutes of traditional services and thus stealing the latter’s revenues and profits as well as the existence of a market failure, in which there is a lack of adequate financial incentive for large TSPs to invest in infrastructure due to the lack of compensation - is unfounded. There are inherent structural differences between the two, the primary one being that OCS providers are essentially internet-based apps, which don’t own or operate telegraph equipment. Further, OCS do not enjoy the exclusive permissions enjoyed by telcos - such as the ability to obtain numbering resources, a right of way to set up Infrastructure, etc. Moreover, OCS makes huge investments in telecom infrastructure and networks, are significant revenue generators for telcos, and create demand for broadband services.

3. Selective Banning

- 3.1. While the TSPs largely pointed out the technical challenges in selectively banning OTT services, they disappointingly failed to oppose the idea as a whole. Most TSPs welcomed the suggestion of exploring selective banning of OCS and websites as an alternative to complete internet shutdowns. Notably, the TSPs cited the technical and practical concerns of implementing these selective bans from their end. The TSPs instead asked for support from online applications and websites, particularly in sharing a full range of URLs and IPs with the former. For instance, Vodafone Idea stated, *“the regulatory framework should enable Competent Authorities to have access to proper*

¹¹ Reliance Jio Infocomm Limited’s Comments on TRAI’s Consultation Paper on “Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services”. Available at: https://www.trai.gov.in/sites/default/files/Reliance_Jio_Infocomm_04092023.pdf (Last accessed on September 14, 2023)



identification details of domain name and list of IPs of selective OTT services/websites, which they can provide to TSPs under shutdown orders.”¹²

- 3.2. Some TSPs even went so far as to suggest that all classes of OTT services, whether communication, content, or otherwise, must be brought under the regulatory framework for selective banning of OTT services in the country, in the interest of national security. Citing infrastructural and investment inadequacies on their end, the TSPs suggested that selective banning of apps should be implemented at the application level/ OTT service provider end, instead of the network layer.
- 3.3. It is worth noting that given restrictions in India tend to be localised, the application layer is also imperfect. IP Geolocation services like Maxmind estimate only a 66% accuracy at the city level in the US.¹³ ‘If-so’, a WordPress plugin service which includes Geolocation services said, “IP-based geolocation services can only provide an approximate measure of geolocation accuracy. With these services, you can obtain 95 percent to 99 percent accuracy of a user’s country. IP-based geolocation services provide 55 percent to 80 percent accuracy for a user’s region or state. And they provide 50 percent to 75 percent accuracy for a user’s city.”¹⁴ The accuracy level may be lower in India, and may even be further complicated by the narrow/localised restrictions in India which are enforced at the level of cities, districts, or specific localities, and do not correspond to networks that geolocation services are based on.
- 3.4. BSNL listed, to some extent, the difficulties of implementing such selective bans: *“It is pertinent to mention that such type of selective barring can be done for limited time for limited OTT services. There will be need to define this time period and limit of number of OTT service to be banned at a time, this will help to designing and expanding the TSP infrastructure accordingly.”¹⁵* On the other hand, Airtel took the extreme route of covering all online services under the regulatory framework for banning: *“Therefore, all classes of OTT services, i.e, OTT communication services, OTT broadcasting services and OTT application services, should be covered under the regulatory framework for selective banning of OTT services in the country.”¹⁶*

¹² VIL Comments to the TRAI Consultation Paper on “Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services”. Available at: https://www.trai.gov.in/sites/default/files/Vodafone_Idea_04092023.pdf (Last accessed on September 14, 2023)

¹³ “Geolocation Accuracy”, published by MaxMind website. Available at:

<https://support.maxmind.com/hc/en-us/articles/4407630607131-Geolocation-Accuracy> (Last accessed on September 15, 2023)

¹⁴ “Everything You Need to Know About IP Based Geolocation”, published by the If-So Website. Available at:

<https://www.if-so.com/geo-targeting/> (Last accessed on September 15, 2023)

¹⁵ BSNL comments on “Consultation Paper on Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services”. Available at: https://www.trai.gov.in/sites/default/files/Bharat_Sanchar_04092023.pdf (Last accessed on September 14, 2023)

¹⁶ Bharti Airtel Limited’s Response to TRAI Consultation on Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services. Available at: https://www.trai.gov.in/sites/default/files/Bharti_Airtel_04092023.pdf (Last accessed on September 14, 2023)



- 3.5. What continues to remain unclear, despite these suggestions, is the method of implementation (limited according to duration or geographical area), process, and feasibility of implementation at scale of such bans. Any such bans may lead to increased burden, cost, and worrying consequences for small-scale businesses and users. It is worth considering that while malicious actors may find workarounds, citizens that rely on a daily basis on services using the internet at scale may not, and thus will be impacted. Alternatively, those seeking workarounds without any malice may also be criminalised. Workarounds may include the use of alternate applications which are not banned or other means such as VPNs, which may prompt the government to continuously expand the list of banned/ blocked applications. Such overbroad restrictions would be disproportionate and its implementation would be challenging, requiring burdensome, unimplementable orders.
- 3.6. In addition to our arguments made in the initial comments sent to TRAI, we would like to offer support to the following submission made to TRAI under this consultation process:

Indian Digital Media Industry Foundation's stance on the idea to selectively ban internet applications and websites: *"Any attempt to selectively ban under a separate procedure or even to consider bringing them under the scope and ambit would be highly detrimental to free speech which is guaranteed under the Constitution and upheld by the Supreme Court in various judgements. It is further imperative to note that Selective banning of OTT services could also have economic impact as it could lead to a decrease in foreign investment and a negative impact on trade relations with other countries."*¹⁷

Internet Society: *"National and regional bans can also have the ironic effect of undermining security online for people. Law and order and national security that supposedly come from banning a particular app or service is a security blanket made entirely of holes."*¹⁸

We vehemently oppose any demand to regulate, licence, and selectively ban OCS. Any move toward regulating such players will lead to severe consequences on user choice, freedom, and autonomy, net neutrality, as well as the innovation ecosystem.

Thank you and kind regards.

¹⁷ Indian Digital Media Industry Foundation's response to TRAI's "Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services". Available at: https://www.trai.gov.in/sites/default/files/INDIAN_DIGITAL_MEDIA_INDUSTRY_FOUNDATION_04092023.pdf (Last accessed on September 14, 2023)

¹⁸ Internet Society's comments on the TRAI Consultation Paper on Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services. Available at: https://www.trai.gov.in/sites/default/files/Internet_Society_01092023.pdf (Last accessed on September 14, 2023)



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