

R.B Sahajpal
Counter Comments
On
TRAI CP¹ PR²

Introduction:

It may please be noted that:

1. The word “**expected**” is occurring ‘16’ times in the CP. The word ‘**likely**’ is occurring ‘07’ times in the CP. The word “**expected**” is occurring ‘16’ times in the CP. The phrase ‘**in turn**’ is occurring ‘05’ times in the CP. The word ‘help’ is occurring ‘42’ times in the CP. The word ‘believe’ is occurring ‘2’ times in the CP. Their occurrence alludes to “if-----”then” kind of situation in the nature of a hypothesis which is not proven implying results may happen or may not happen.

1.1. The words given in ‘1.’ above are only illustrative. There are many other words or phrases leading to similar conclusion as of ‘1’ above.

2. The sector discussed in the CP is contributing to ‘fiscal deficit’³ due to various reasons.

3. The phrase ‘software products’ is occurring ‘8’ times in the CP.

4. The phrase Make-in-India is occurring ‘16’ times in the CP.

Issues for Consultation

Q1. Is the PLI scheme in its current form effective enough to address the needs of promoting NATEM in India? Are any amendments or extensions required to the current PLI scheme to make it more effective? Please provide details.

Q2. Whether going beyond PLI scheme, a range of financial and fiscal incentives needs to be put in place to promote NATEM in India? Please elaborate your response.

Q3. Does the Electronic Development Fund (EDF) meet the requirements of promoting NATEM in India? What are the limitations in EDF for the NATEM sector and how can its scope be enhanced?

Q4. Is there a need for creation of separate funds on lines of EDF or those earlier recommended by TRAI (like TEPF and TMPF) for promoting NATEM in India? What institutional mechanisms should be put in place to govern the fund(s)? Give justification and elaborate on its possible impact on the sector.

Q5. What additional measures are suggested for promoting and supporting the Start-up ecosystem in the telecom sector in India.

Q6.a. Which of the financial instruments related to project financing, contract financing and credit default insurance currently available in India are being used by the stakeholders and to what extent?

Q6.b. Are these financing instruments able to cater to the needs of NATEM in India?

Q6.c. Are there any suggestions to further improve these financial instruments or are there any new proposed financial instruments that 101 can cater to the needs of NATEM in India? Please provide full details along with justification.

Q7. Whether the existing schemes relating on CAPEX and interest subvention are meeting the requirement of finance for NATEM in India.? Suggest modifications/ new schemes needed if any with details.

Q8. Whether the existing financial assistance for MSMEs that are into NATEM are sufficiently catering to their requirement or a separate dedicated scheme is required for the sector? Please provide a detailed response along with suggested schemes, if any.

Q9. Whether any cost disadvantage is experienced by domestic NATE manufacturers as compared to global counterparts due to various limitations discussed above? If yes, what is percentage cost disadvantage to domestic NATE manufacturers vis a vis other country? The details of calculations and methodology adopted for the same may be provided.

Q10. Whether schemes allowing tax holidays/deferment of tax are available for NATE manufacturers? If yes, are they meeting the requirement? If no, what modifications are required? Please justify and provide details.

Q11. Is the PMA/PMI scheme in its current form comprehensive for promoting NATEM? Are there any suggestions for modifications? How can the challenges associated with implementation of PMA/PMI be addressed? Please elaborate.

