



Dear Mr. Deepak Pathak:

We, the undersigned associations appreciate, the opportunity to provide feedback to the Telecommunications Engineering Center (TEC) regarding the adoption of the Telecommunications Standards Development Society, India (TSDSI) 5Gi standard as a national standard in India.

We welcome the active participation of India in the global 5G ecosystem through the ongoing network trials of 5G technology, the soon-to-be published National Frequency Allocation Plan, the 10-year spectrum roadmap, and the active partnership between Indian operators and the global information and communications technology (ICT) vendor community on India's 5G plans.

In this context, we want to underline the importance of adopting the existing, globally harmonized standards developed by the 3rd Generation Partnership Project (3GPP). Adoption of these standards in India will be critical to address the digital divide, strengthen the country's status as a global manufacturing hub for ICT, and support technology partnerships with the U.S. and other global partners.

Proponents of 5Gi assert that the technical modifications they introduced to the 3GPP specs are uniquely needed to address India's rural coverage needs. We hope that TEC does appropriate technical due diligence to confirm these capabilities during its review process. We appreciate the urgent need for connectivity in rural India, and we believe that the global 5G standards – developed by stakeholders from across the world with a range of both rural and urban use cases in mind – are the best answer to this challenge. 5G deployments based on 3GPP technology are currently covering distances in excess of 10 kilometers, with average downlink speeds of 1 Gbps and uplink speeds of 57 Mbps.¹ Importantly, using global standards such as 3GPP's 5G standards addresses some of the biggest obstacles in rural 5G buildouts – affordability and ease of deployment. By leveraging economies of scale achieved through globally harmonized standards and proven technology solutions that have already been tested around the world, India's telecommunications network operators will be able to build out networks for rural India at affordable rates with fewer challenges related to system integration and management.

Adopting 3GPP's 5G standards as a national standard also will further strengthen India's status as a manufacturing hub for ICT products and services. By using common standards, companies can set up manufacturing operations in India with the confidence that they can easily serve both the Indian market and export to global markets. As 5G becomes fundamental to the fabric of connectivity across industries and as 3GPP continues to release updated specifications that may diverge from and make obsolete country-specific standards, the economic advantages of leveraging globally harmonized technology standards to India's manufacturing ecosystem will only become more apparent.

¹ <https://www.globenewswire.com/news-release/2021/06/08/2243507/0/en/Nokia-Qualcomm-and-UScellular-hit-extended-range-5G-world-record-over-mmWave.html>

We appreciate the commitment between leaders from India, the United States, Japan, and Australia to facilitate coordination on technology standards development and cooperate on telecommunications deployment in the context of the Quad Emerging Technology Working Group. Adopting global specifications for 5G technology is a foundational step toward demonstrating further cooperation on these issues. Not doing so could set back vital shared work on supply chain security, vendor diversification, and alternative network architectures such as Open RAN which will also rely on globally harmonized standards. Indian participation is vital to the development of an innovative and secure global technology ecosystem, and we welcome Indian stakeholders to further deepen engagement with 3GPP in support of technologies that meet the country's needs.

As TEC considers incorporation of 5Gi as a national standard, we hope that it will also consider the importance of globally harmonized standards for 5G to the success of India's ICT ecosystem. We also ask that, whatever standards are adopted, that the Department of Telecommunications avoid making the use of any one standard mandatory and allow telecommunications service providers to deploy technologies conforming to the standards of their choice. We appreciate the extension of the deadline to comment on this matter, and we hope to find an opportunity to meet and discuss this matter at a future date.

Signed:

Information Technology Industry Council (ITI)

Telecommunications Industry Association (TIA)

UK India Business Council (UKIBC)

U.S. Chamber of Commerce

US-India Business Council (USIBC)

US-India Strategic Partnership Forum (USISPF)

CC:

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