

## CUTS Comments on the Draft National Telecom Policy, 2025

### Background

Consumer Unity & Trust Society (CUTS) expresses gratitude to the Department of Telecommunications for inviting comments and suggestions on the Draft National Telecom Policy, 2025 (“Draft Policy”).<sup>1</sup> We welcome the forward-looking Draft Policy introduced by the DoT and the prioritisation of advanced technologies such as 6G, AI, quantum communications, and IoT.

CUTS looks forward to the DoT considering its suggestions and contributing to its efforts in building a secure, future ready, inclusive, and innovation-driven digital communications ecosystem. In this regard the following suggestions may kindly be considered.

### Rename the policy as ‘National Digital Communications Policy 2025’

At the outset, it is submitted that instead of the word ‘Telecom’ the words ‘Digital Communications’ be used as was the case earlier. This gives an integrated and futuristic picture, including satellite-based communications and other digital mode of communications (such as WhatsApp, Telegram, Messenger, Signal etc.) as well as any other digital mode that may not be visualised today.

In general, the Draft Policy lacks an integrated approach, though it talks about integration of terrestrial and non-terrestrial networks. At most places it seems that the policy provisions are applicable only on telcos, and not on satcom/undersea cable players. We need to see them together in future and start diminishing the existing policy and regulatory dichotomy, which the Draft Policy does aim to achieve.

### Emphasising on 6G as policy priority

While the Draft Policy outlines broad ambitions around spectrum readiness, IPR development, and capacity building when it comes to 6G, it lacks recognition of 6G as a strategic policy priority in itself. It is to be noted that the ITU’s IMT-2030 framework positions 6G as the first-generation integrating communication with sensing capabilities.<sup>2</sup> India has also established a dedicated institutional framework for its 6G mission, i.e. the Bharat 6G Alliance.

So, a clearly articulated policy roadmap for 6G development, including timelines, regulatory mechanisms, and risk mitigation strategies may be needed, especially considering that Draft

---

<sup>1</sup> [https://dot.gov.in/sites/default/files/NTP\\_2025.pdf](https://dot.gov.in/sites/default/files/NTP_2025.pdf)

<sup>2</sup> <https://gsacom.com/paper/6g-status-update-june-2025/>

Policy is designed as a five-year policy framework and the target year for finalising 6G specifications is also the same (IMT-2030).

Drawing upon CUTS' work, Ethical Framework for 6G,<sup>3</sup> we recommend that 6G be explicitly positioned as a national strategic objective in Draft Policy. We identified 6 pillars of such an ethical framework, namely cybersecurity, privacy, competition, consumer protection, trust, and inclusivity & sustainability. The principles of trust, transparency, and ethics should be embedded in the design of 6G technologies through frameworks such as zero-trust architectures, quantum-resistant encryption, and privacy-by-design protocols.

While most aspects of the Ethical Framework for 6G have been dealt in the Draft Policy, the 'competition' aspect is missing. The policy vision can include "a competitive telecom/digital communication sector", and strategies to achieve the same.

It is welcomed that the Draft Policy is promoting funding for R&D in emerging areas, establishing various Centres of Excellence, testbeds, and creating sandbox environments, which are essential to foster targeted, interdisciplinary research, particularly in the components of 6G like cybersecurity, ethical AI, and secure network architectures.<sup>4</sup>

In addition, more emphasis may have been bestowed on international collaborations with respect to relevant new and emerging technologies, including 6G. A CUTS' report underscored the mutual benefits of bilateral and multilateral partnerships in advancing secured and inclusive 6G ecosystems.<sup>5</sup> For example, India and Australia can jointly tap into each other's strengths. India's innovation ecosystem and Australia's cybersecurity and quantum capabilities can shape a forward-looking 6G ecosystem. Thus, India may not pursue 6G in isolation, and may prefer collaborating with like-minded countries like Australia, Japan, the US and the EU.

Furthermore, we recommend that the Draft Policy explicitly support open, interoperable architectures such as Open RAN/6G, provide targeted support to startups in advanced telecom technologies, and introduce an incentive framework to boost Indian telecom exports, thereby helping India transition from a net technology consumer to a trusted global technology provider.<sup>6</sup>

It is also submitted that the cover page of the Draft Policy in order to be more futuristic and relevant should also reflect 6G. It only mentions 5G, which is already under implantation. The cover page should better reflect transition from 5G to 6G.

---

<sup>3</sup> <https://cuts-ccier.org/pdf/An-ethical-framework-for-6G.pdf>

<sup>4</sup> <https://cuts-ccier.org/pdf/report-standardising-standard-setting-for-6g.pdf>

<sup>5</sup> <https://cuts-ccier.org/pdf/report-strategic-opportunities-for-australia-and-india-from-6g.pdf>

<sup>6</sup> <https://cuts-ccier.org/pdf/understanding-6g-developments-and-challenges.pdf>

## **Guard against mandating biometric based identification**

Under “Mission 4: Secure and Trusted Network” of the Draft Policy, one of the goals is to establish a biometric based identification for all telecom users to ensure privacy and protection. It is not clear as to how this mechanism will ensure privacy protection. On the contrary such a mechanism may pose privacy and security concerns to users. As it is, most consumers use Aadhar-based KYC to obtain sim cards, which is optional. Whether the policy intends to make it mandatory or create another biometric based mechanism?

It is to be noted that this section is devoted on secured and trusted network, which is essentially about network equipment and should not have included users’ interface with the network. Like technology management protocols, users’ protocols with respect to cyber security may be kept out this policy’s purview. These need to be better dealt within national cyber security strategy.

It is therefore recommended to review the inclusion of this provision, as the same is quite contentious and may generate unnecessary controversies.

## **Other relevant comments**

- On the lines of promoting Ground Station as a Service (GSaaS) (in the case of Satellite communication), also include promotion of Cable Landing as a Service (CLaaS) – a part of undersea cable system. This will open opportunities for small Indian players, including start-ups.
- Ease of Doing Business provisions may also include satcom and undersea cables, apart from telecom. Promotion of satcom and undersea cable need to have some added emphasis.
- With respect to developing QoS standard benchmarks, consumer-facing broadband labelling may kindly be considered to be included in the Draft Policy. This can be informed by a CUTS’ study “Consumer Broadband Labels: For Greater Transparency & Informed Consumers”.<sup>7</sup>
- In ‘Mission 2’, in para 3.5 the word ‘Patent’ is missions (typo) – it should be “Controller General of Patents, Designs and Trade Marks”.
- Cybersecurity for satcom may be better pronounced. To be futuristic, cyber security of an integrated terrestrial and non-terrestrial network (as envisioned for Ubiquitous 6G) need to be better pronounced.

---

<sup>7</sup> [https://cuts-ccier.org/pdf/Briefing\\_Paper-Consumer\\_Broadband\\_Labels-For\\_Greater\\_Transparency\\_Informed\\_Consumers.pdf](https://cuts-ccier.org/pdf/Briefing_Paper-Consumer_Broadband_Labels-For_Greater_Transparency_Informed_Consumers.pdf)

- In addition to Regulatory Impact Assessment (RIA), provisions for Technology Impact Assessment (TIA) may also be considered. Like RIA, TIA is also being adopted by some developed countries, and is emerging as a good global practice.
- The Draft Policy should include full form of the mentioned acronyms, at least at the first instance. A glossary explaining certain terminologies and acronyms may also be added in the Draft Policy.
- There are also repetitions of ideas, which may be clubbed and made more coherent.
- Insert page numbers, which is missing in the Draft Policy.

### **About CUTS**

CUTS<sup>8</sup> is an independent, nonpartisan, and non-profit policy think and action tank that has been working towards enhancing the regulatory environment through evidence-based policy and governance-related interventions across various sectors and boundaries. In its 41 years of operation, CUTS has come a long way from being a grassroots consumer centric organisation headquartered in Jaipur, having centres in Delhi,<sup>9</sup> and Kolkata,<sup>10</sup> to now opening overseas Resource Centres in Vietnam,<sup>11</sup> Kenya,<sup>12</sup> Zambia,<sup>13</sup> Ghana,<sup>14</sup> Switzerland,<sup>15</sup> and in the United States of America.<sup>16</sup> CUTS has been actively representing consumers' interest before different state governments and central government ministries through various programme centres, namely: Centre for International Trade, Economics & Environment (CITEE),<sup>17</sup> Centre for Consumer Action, Research & Training (CART),<sup>18</sup> Centre for Human Development (CHD)<sup>19</sup> and Centre for Competition, Investment & Economic Regulation (CCIER).<sup>20</sup>

CUTS works on various issues to foster an inclusive digital economy,<sup>21</sup> including issues of

---

<sup>8</sup> [CUTS International – Consumer Unity & Trust Society \(cuts-international.org\)](https://cuts-international.org)

<sup>9</sup> [CUTS Delhi Resource Centre](#)

<sup>10</sup> [CUTS CRC](#)

<sup>11</sup> [CUTS HRC](#)

<sup>12</sup> [CUTS Nairobi](#)

<sup>13</sup> [CUTS Lusaka](#)

<sup>14</sup> [CUTS Accra](#)

<sup>15</sup> [CUTS Geneva](#)

<sup>16</sup> [CUTS WDC](#)

<sup>17</sup> [CUTS Citee](#)

<sup>18</sup> [CUTS Cart](#)

<sup>19</sup> [CUTS CHD](#)

<sup>20</sup> [CUTS CCIER](#)

<sup>21</sup> [Inclusive Digital Economy - Ccier \(cuts-ccier.org\)](#)

multiparty privacy,<sup>22</sup> data localisation,<sup>23</sup> and other general issues of data protection,<sup>24</sup> and encryption.<sup>25</sup> CUTS also works with various ministries and government departments for advocacy efforts<sup>26</sup> on issues within digital economy, more recently on the draft telecommunications (telecom cyber security) amendment rules, 2025,<sup>27</sup> draft digital personal data protection rules,<sup>28</sup> report on AI governance,<sup>29</sup> draft broadcasting bill,<sup>30</sup> draft guidelines for prevention and regulation of dark patterns,<sup>31</sup> draft registration of consumer organisations (amendment) regulations<sup>32</sup>, draft telecommunication mobile number portability regulations,<sup>33</sup> digital competition,<sup>34</sup> competitive neutrality,<sup>35</sup> among others.

\*\*\*\*\*

For any clarifications/further details, please feel free to contact: Ujjwal Kumar ([ujk@cuts.org](mailto:ujk@cuts.org)) and/or Krishaank Jugiani ([kju@cuts.org](mailto:kju@cuts.org)).

---

<sup>22</sup> [“My data or yours?” Unravelling Multi-Party Privacy \(MPP\) among Consumers of Digital Credit in India](#)

<sup>23</sup> [Understanding the Impact of Data Localization on Digital Trade - ccier](#)

<sup>24</sup> <https://cuts-ccier.org/cdpp/>

<sup>25</sup> [Understanding Consumers’ Perspective on Encryption - ccier](#)

<sup>26</sup> [Advocacy - Ccier](#)

<sup>27</sup> <https://cuts-ccier.org/pdf/comments-on-the-draft-telecommunications-amendment-rules-2025.pdf>

<sup>28</sup> <https://cuts-ccier.org/pdf/comments-on-the-draft-digital-personal-data-protection-rules-2025.pdf>

<sup>29</sup> <https://cuts-ccier.org/pdf/comments-on-the-subcommittees-report-on-AI-governance-and-guidelines-development.pdf>

<sup>30</sup> [CUTS Comments on Broadcasting Services \(Regulation\) Bill, 2023](#)

<sup>31</sup> [CUTS Comments on Draft Guidelines on Prevention and Regulation of Dark Patterns](#)

<sup>32</sup> [CUTS comments on TRAI Consultation Paper on the draft Registration of Consumer Organisations \(Amendment\) Regulations, 2023](#)

<sup>33</sup> [CUTS comments on Draft Telecommunication Mobile Number Portability \(Ninth Amendment\) Regulations, 2023](#)

<sup>34</sup> [Comments By CUTS International On Draft Digital Competition Bill, 2024](#)

<sup>35</sup> [Promoting Competitive Neutrality in Government Using Advocacy](#)