Key Initiatives in Digital Economy

Introduction

Consumer Unity & Trust Society (CUTS) is an independent non-profit economic policy research, advocacy, networking, and capacity building organisation. For the past several years, it has been undertaking consumer-facing and evidence-based initiatives to promote optimal regulation, competition, and governance in the digital economy.

This document summarises key initiatives by CUTS across the following themes of digital economy:

1. Privacy and Data Protection

Comments on Draft Digital Personal Data Protection Rules, 2025: see here

[Economic Analysis of Verifiable Parental Consent Mechanisms: Evaluating Impact on Consumers and Data Fiduciaries](#)
- The project examines and compares the costs associated with various Verifiable Parental Consent mechanisms, including those proposed under the draft Digital Personal Data Protection Rules, 2025, on each mechanism's implementation, operational, compliance, privacy, efficiency and scalability costs.

  a. Economic Analysis of Verifiable Parental Consent Mechanisms: Evaluating Impact on Consumers and Data Fiduciaries: see here.

[Examining the Scope of Behaviour Tracking and Targeted Advertisement of Children and Suggesting an Optimum Regulatory Approach](#)
- The project examined the role of personalisation in the children's digital lives, analysing the benefits and risks emerging from behaviour monitoring and targeted advertisements. It also analysed the exemptions proposed under the draft Rules to assess whether they are sufficient or should be expanded to ensure a more personalised experience for children in a safe and secure manner.

  a. Regulation of Behavioural Monitoring and Targeted Advertisements Directed at Children: Ensuring Personalisation Benefits Children: see here.

["My data or yours?" Unravelling multi-party privacy among consumers of digital credit in India:](#)
- A mixed methods study that included a large-scale survey, interviews, observation and focus group discussions with DFS users focussed around multi-party privacy. The study aimed to surface their understanding, expectations and concerns vis-a-vis data that fintech platforms have about them.

  a. My data or yours?" Unravelling Multi-Party Privacy (MPP) among Consumers of Digital Credit in India: see here.
  b. Workshop on "My Data or Yours?" Unravelling Multi-Party Privacy (MPP) Among Consumers of Digital Credit in India: see here.

[Research-based Advocacy on Unintended Lacunae of including aspects of NPD in PDPB:](#)
- Research based advocacy and outreach initiative for key policy makers/ influencers (among other relevant stakeholders), on the challenges prevalent in including aspects of Non Personal Data (NPD) governance in the Personal Data Protection Bill (PDPB).

    a. Non-Personal Data 2.0: see [here](#)

[Examining the Rationale, Assumptions and Approaches to Non-Personal Data Sharing (NPD):](#)
- This project dispassionately examined the NPD sharing framework in India and questioned assumptions underlying Gopalakrishnan Committee Report recommendations. This was done by considering appropriate evidence and by taking a comparative and multi-stakeholder perspective.

    a. Policy brief on Future of Non-Personal Data Governance in India: see [here](#)
    b. First Phase Report: Navigating the Puzzle of Non-Personal Data Sharing: see [here](#).
    c. Second Phase Report: Dimensional Analysis of Future of Non-Personal Data Sharing: see [here](#).

[Survey on privacy, data protection and user welfare in India:](#)
- In-depth interactions with 2,400 consumers to understand their perspectives on privacy, data collection, data sharing, among others.
    a. Presentation on Findings of the Survey on Privacy, Data Protection and User Welfare in India: see [here](#)

[Highlighting Inclusive and Practical Mechanisms to Protect Children's Data:](#)
- Interactions with 600 parents and 600 young internet users to understand their perspectives on risks to children's data and possible mitigation measures.
    a. Survey Findings on Protecting Children's Data Analysing Perspectives of Parents & Children: see [here](#)
    b. Briefing Paper on Children's Data Protection: see [here](#)
    c. Briefing Paper on Global Technological Developments in Age Verification and Age Estimation: see [here](#)

[Understanding Consumers' Perspective on Encryption](#):
- A study based on interaction with consumers to assess their perspective on secured communication services.

    a. Survey Findings: Understanding Consumers Perspective on Encryption: see [here](#).
    b. Opinion: IT Rules shy away from preserving encryption: see [here](#).
    c. Opinion: Did encryption fail Bollywood? see [here](#).

2. Electronic Commerce

- CUTS is a partner organisation of the 'eTrade for All' initiative of UNCTAD. CUTS also has a [MoU](#) with UNIDO inter alia to work on e-commerce issues. The organisation is also well connected with WTO and ITU.

[Fostering an Inclusive E-commerce Ecosystem in India](#):
- Exploring ways to institutionalise 'inclusive ecosystems' in the digital transformation in India to ensure equitable distribution of benefits of such transformation to all relevant stakeholders.

    a. Whitepaper-Fostering an Inclusive E-commerce Ecosystem in India: see [here](#).
    b. An Optimal Way to Usher Small Businesses into the Digital Age: see [here.](#)

[Status of E-consumers in India (SECI)](#):
- Analysing and evaluating the status of e-consumers while studying the e-commerce market in India.

Sub Projects:
1. Consumer Welfare Index: Consumer Welfare Index was created by analysing different factors which affect e-consumers. A survey based study has been carried out for two consecutive years, analysing the consumer welfare attained by e-consumers. Report for Round 1 of the study based on the findings from a national-level consumer survey was disseminated. see [here](#). Report for the Round 2 of the study is available [here](#).
2. Evolving E-commerce Policy in India: A policy paper is being developed to highlight critical elements that must make a part of an e-commerce policy, keeping competition, consumer protection and regulatory issues in mind. See the report [here](#).
3. Commitment and Settlement Procedures: The viability and implementability of the commitment and settlement procedure as proposed by the latest Competition (Amendment) Bill, 2022 and policy recommendations for the way forward shall be deliberated under this sub-project. See the report [here](#).
4. Consumer Welfare in Competition Assessment: A global discussion forum will be organised focussing on the role of consumer welfare in competition assessment and the role of economics in effects-based competition. Based on the discussions that will ensue in the forum, a discussion paper will be produced.
5. Multi-Homing and Omni Channels: The extent to which e-consumers and sellers use different retail platform models to maximise benefits and the relevance of multihoming and omni-channels in India will be compiled in a report. See the report [here](#).

[Regional Inclusive Growth in Digital Economy](#):
- Conducted across India, Philippines and Vietnam, a research study that established that consumers benefit from the advent of digital tools and platforms, thereby enhancing their standard of living.

    a. Going Digital – From Innovation to Inclusive Growth in the Philippines: see [here](#).
    b. Going Digital – From Innovation to Inclusive Growth in Vietnam: see [here](#).
    c. E-clinic Services in Rajasthan, India: A case study: see [here](#).

White Paper on [Consumer Grievance Redressal (CGR) 2.0](#)

- The Whitepaper includes: (i) Existing state of affairs in the consumer grievance redressal mechanism, including its online component; (ii) Gaps and problems in the present system, and consumer expectations; (iii) Good practices in other countries with respect to online dispute resolution of consumer grievances; (iv) Roles and responsibilities of platforms, business suppliers, government agencies/regulators, and also consumers; (v) Learning from the other related initiatives suggested or launched in India; and (vi) Contours of a new age Consumer Grievance Mechanism 2.0.

    a. Empowering Consumers: the Evolution and Challenges of Grievance Redressal in the Digital Age: see [here.](#)

3. Fintech and Digital Payments

Implementation of RBI's Tokenisation Directive in Consumer Interest (CoFT Project):

- Research study that brought forth a multi-stakeholder perspective on tokenisation, its operationalisation, and unintended adverse consequences due to lack of ecosystem preparedness.

  a. Operationalising CoFT in Consumer Interest: see here.
  b. Consumer Survey Findings: see here.
  c. Spotlight- Unravelling the CoFT Uncertainty: see here.

- Survey on awareness, access, usage and experience of digital payments: In-depth interaction with 2,020 users of digital payments to understand their perception and experience with respect to availability, access, usage, experience, benefits, and challenges, and reforms required to deepen different modes of digital payments.

  a. Presentation for RBI Committee on Deepening Digital Payments: see here.
  b. Submission to the Committee to Review the Framework Related to Digital Payments: see here
  c. Submission to the Ministry of Electronics and Information Technology on the Draft Information Technology (Security of Prepaid Payment Instruments) Rules 2017: see here
  d. Submission to the Reserve Bank of India on the Draft Master Directions on Prepaid Payment Instruments, 2017: see here

Competition and Regulatory Assessment in Digital Payments Infrastructure Sector:

- Understanding the level of competition in the digital payments sector based on competition assessment toolkit, primary and secondary research, and providing appropriate recommendations.

  a. Research Report: Digital Payments: Level the Playing Field to Leverage the Potential: Competing with cash in retail payments: see here.

4. Cross-Border Data Flow

Consumer Impact Assessment on Cross-Border Data Flow:

- Evidence based research and assessment of the likely impact on consumers due to restrictions on cross-border data flow based on consumer facing indicators like service attributes, privacy and data protection, cyber security, grievance redress, etc.

  a. Findings of Consumer Impact Assessment of Data Localisation: see here.

Understanding the Impact of Data Localization on Digital Trade:

- The project aimed to comprehensively understand and analyse the importance of digital exports for India's Gross domestic Product (GDP) and economy. Further the project also tried to understand the impact of data localisation barriers on Indian exports of digital goods and services.

  a. Report: Data Localisation: India's Double-Edged Sword?: see here.
  b. Infographic: Data Localisation: Preserving India's Digital Atmanirbharta: Need to Look Beyond Data Localisation: see here.
  c. Impact of Data Localisation on Digital Services Exports from Bangladesh: see here.
  d. Impact of Cross Border Data Flow Restrictions on Economy of Bangladesh: see here.

5. Telecom and Broadcasting

Highlighting the implication of Anti-Tobacco Messages on OTT Platforms for different stakeholders

- A study examining the impact of the Ministry of Health's proposed amendments requiring OTT platforms to display 30-second anti-tobacco health spots and 20-second disclaimers at the beginning and middle of content. The study analyses the effects of proposed amendments on stakeholders and aims to recommend a balanced, nuanced approach to regulating anti-tobacco messaging on digital platforms.
  a. Comments on "Draft Notification Regarding Changes in Rules 11 of the COTPA Amendment Rules, 2023 - OTT Rules": see here

Comments on Broadcasting Services (Regulation) Bill, 2023: see here.

TV Consumer Market Study:

- An on-ground research-based study to gather consumer insights and perspectives with respect to TV channel-based video consumption on parameters of consumer choice, channel selection, pricing, quality of service, etc.

  a. Towards Effective Choice: A Nation-wide Survey of Indian TV Consumers: see here.

Ethical 6G – Identifying Elements of Ethical Framework for 6G and Creating Opportunities for India and Australia:

- The project aims to Understand the what, why, when, and how of 6G. Further it tries to understand strategic issues and opportunities in the Indo-Pacific for India and Australia of 6G Technology Development while conducting research on standard making and ethical framework for 6G.
  a. Understanding 6G Developments and Challenges: see here
  b. Strategic Opportunities for Australia and India from 6G: see here
  c. Standardising Standard Setting for 6G: see here
  d. An Ethical Framework for 6G: see here
  e. Ethical, Governance 6G Frame – Risk Statement: see here

Survey on benefits and challenges of over-the-top (OTT) services to users:

- In-depth interaction with 600 OTT users to understand perceived benefits and challenges of OTT services on their economic and social lives. see here

  a. Presentation on findings of the survey on benefits and challenges of OTT services to users. see here.

Consumer Perspective on Unlicensed 6 GHz Spectrum (Wi-Fi 6E Project):

- The project will examine and understand consumer perspective on unlicensed spectrum in India, specifically 6 GHz band for wireless connectivity (Wi-Fi 6E).

  a. Consumer Explainer on Unlicensed Spectrum and WiFi 6e Use Cases: see here.
  b. Examining Wi-Fi 6E for India An International Perspective: see here.
  c. Key Findings & Recommendations for the Way Forward: see here.
  d. Snapshot of Findings: see here.

Understanding and Highlighting Stakeholders' Perspectives on Caller Name Presentation (CNAP) in Telecommunication Services

- To understand and highlight the consumer perspectives and issues which will arise due to the proposed calling party name presentation facility (CNAP) in Indian telecommunications networks.

    a. Collective Consumer Representation on implementation of Caller Name Presentation (CNAP) in Telecom Services: see here
    b. Counter Comments on TRAI Consultation Paper on 'Introduction of Calling Name Presentation (CNAP) in Telecommunication Networks': see here
    c. Comments on TRAI Consultation Paper on 'Introduction of Calling Name Presentation (CNAP) in Telecommunication Networks': see here

Understanding and Highlighting Consumers' Perspectives in the debate of regulation of Over the Top (OTT) Communication Services

- To understand the consumer interest involved in the discussion around regulation of OTT communication services.

    a. Discussion Paper on Analysing effect of regulation of Over-the-Top (OTT) Services on consumer interest and comparing international perspectives: see here
    b. Use Cases & Impact of OTT Services: Case Study of Rajasthan (500 Respondents) : see here
    c. Comments on TRAI Consultation Paper on Regulatory Mechanism for Over-The-Top (OTT) Communication Services, and Selective Banning of OTT Services: see here
    d. Collective Consumer Organisation Representation to the Telecom Regulatory Authority of India regarding the proposed regulation of Over-the-top Services: see here

6. Artificial Intelligence

Comments on the Subcommittee's Report on 'AI Governance and Guidelines Development': see here

Analysing the Impact of Advisory on Deepfakes: User Engagement, Effectiveness, and Future Directions

- A study analysing the implications of Ministry of Electronics and Information Technology's proposed amendments to the Information Technology Rules, 2021, aimed at combating deepfakes and misinformation. It examines the effectiveness of measures like consent popups, metadata labelling, and platform accountability, assessing their impact on stakeholders and aims to recommend a comprehensive approach to addressing AI-generated synthetic content.

7. Misinformation

Support For Women Journalists in Countering Misinformation & Disinformation in The Indo-Pacific Region

- CUTS has implemented multiple initiatives on countering misinformation, disinformation and creating media literacy, focusing on journalists, particularly women journalists. These initiatives have been focused on countering misinformation during covid and in the Indo-pacific region.

    a. Role of Journalists to Curb Misinformation in Times of Covid-19, see here.
    b. Support for Women Journalists in Countering Misinformation & Disinformation in The Indo-Pacific Region: Phase I, see here.

    c. Support for Women Journalists in Countering Misinformation & Disinformation in The Indo-Pacific Region: Phase II, see here.

    d. Training Guidebook on Media Literacy (for media professionals in the Indo-Pacific Region), see here.

[Do Users in India, Kenya and Ghana React Differently to Problematic Content?](#)

- CUTS study to analyse and compare how platform users in India, Kenya and Ghana engage with incorrect, sensational, provocative, divisive, hateful, and misleading information (problematic content), to better understand factors influencing such engagement.

    a. [Operation Strategy Note](#)

    b. Questionnaires for India, Ghana, and Kenya.

    c. Slide Deck: Users' Exposure and Reaction to Problematic Content in India: see here.

8. Cyber Security

APAC Cyber Security Capacity Building Programme for MSMEs in India

- CUTS is implementing a capacity-building initiative to enhance cybersecurity awareness among MSMEs across India. Covering 10 states—Rajasthan, West Bengal, Assam, Arunachal Pradesh, Manipur, Meghalaya, Mizoram, Sikkim, Nagaland, and Tripura—the initiative aims to educate over 20,000 MSMEs on cybersecurity best practices and risk mitigation strategies. See here

CYBER SAFE EAST INDIA – Workshops on Cyber Security for MSMEs and Women Entrepreneurs

- CUTS has been working on developing capacities of adult girls (in the age group of 18-22 years), and MSMEs, particularly women-led MSMEs, on various aspects of cyber security in urban, peri-urban, and rural areas in East and Northeast India. under the project titled "*Cyber Safe East India*".

- Briefing Paper on [Cybersecurity Challenges for Indian MSMEs](#)

    a. [CYBER SAFE EAST INDIA – WORKSHOPS ON CYBER SECURITY FOR MSMES (PHASE – I)](#)
    Workshop on cyber security for MSMEs and women entrepreneurs in Patna (Bihar), Guwahati (Assam), and Ranchi (Jharkhand)

    b. [CYBER SAFE EAST INDIA – WORKSHOP ON CYBER SECURITY FOR MSMES AND WOMEN ENTREPRENEURS (PHASE – II)](#)
    Workshop on cyber security for MSMEs and women entrepreneurs in Shillong (Meghalaya), Itanagar (Arunachal Pradesh), Gangtok (Sikkim), and Darjeeling (West Bengal)

    c. [CYBER SAFE EAST INDIA – WORKSHOPS ON CYBER SECURITY FOR MSMES AND WOMEN ENTREPRENEURS (PHASE-III)](#)
    Workshop on cyber security for MSMEs and women entrepreneurs in Aizawl (Mizoram), Dimapur (Nagaland) and Agartala (Tripura).

[CUTS and UNIDO called for a multilateral regime on data privacy and other aspects of cyber security](#)

9. Miscellaneous

[Examining the Inclusion of 'Cloud Services' under the Draft Digital Competition Bill](#)

- A study evaluating the inclusion of cloud services under the draft Digital Competition Bill (DCB), proposed by the Committee on Digital Competition Law (CDCL). It examines global competition

issues in the cloud services sector, assesses whether cloud services exhibit gatekeeper characteristics, and analyses the potential impact on Indian businesses, start-ups, consumers, and the digital economy.

Mapping the Ecosystem of Illegal Online Gambling Operators in India

- A study analysing the growing illegal online gambling ecosystem in India, examining user access, payment mechanisms, and regulatory loopholes. It explores the role of social media, financial risks, and enforcement challenges, aiming to provide policymakers with actionable recommendations for strengthening regulations and mitigating the economic and social harms of illegal gambling.

Ease of Doing Digital Business [EoDDB]:

- Study intending to examine the factors that facilitate the ease or unease of doing digital business in India in existing and proposed legislations and their impact on them, including the indicators of economic growth such as innovation, investment, etc.

  a. [Un]Ease of Doing Digital Business: A Study of Policy and Regulatory Challenges: see here.
  b. Discussion Paper on Impact of Unnecessary Compliances Ease of Doing Digital Business in India: see here.
  c. Discussion Paper on Impact of Inadequate Digital Infrastructure on Ease of Doing Digital Business in India: see here.
  d. Discussion Paper on Impact of Regulatory Uncertainty on Ease of Doing Digital Business: see here.
  e. Discussion Paper on Impact of Criminalising Provisions on Ease of Doing Digital Business in India: see here.

Regulatory Impact Assessment of Maharashtra City Taxi Rules:

- The project undertook a Regulatory Impact Assessment (RIA) of select provisions of the laws, with the objective of identifying potential impacts on different stakeholders, including incumbent and new taxi service providers, taxi owners, aggregators, government and users.

  a. Research Report on Regulatory Impact Assessment of Maharashtra City Taxi Rules, 2017: see here.
  b. An Evidence-Based Analysis of Relevant Market- The Case of Ridesharing in Delhi-National Capital Region (India) [SSRN]: see here.

Competition Assessment of The Ride Sharing Industry:

- An analysis of relevant market and competition assessment of the ride-sharing industry. In-depth understanding of changing dynamics of competition in the transport sector helped understand consumer's choice and how to formulate better regulations for new and traditional modes of transport.

  a. An Evidence-Based Analysis of Relevant Market- The Case of Ridesharing in Delhi-National Capital Region (India) [SSRN]: see here.

Protecting Online Rights of Changemakers (PORCH)

- Empowering youth and women's voices by increasing their involvement and engagement in crucial discussions of internet governance.