



Society for

Knowledge Commons

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**To,
Shri A Robert J Ravi,
Advisor (TD &QoS),
Telecom Regulatory Authority of India,
MahanagarDoorsancharBhawan,
Jawaharlal Nehru Marg,
New Delhi – 110 002**

April 24, 2015

Re: Comments on the Consultation Paper on 'Regulatory Framework for Over the Top (OTT) Services' issued by TRAI on March 27, 2015.

Dear Sir,

We refer to the aforementioned Consultation Paper, and enclose herewith our comments thereon. We would also crave your indulgence to provide further submissions / responses to TRAI during the counter comments submission phase.

Do note that the Society for Knowledge Commons is a society registered under the Societies Registration Act, 1860, having its registered office at B-130, Shivalik, Malviya Nagar, New Delhi - 110017.

The Society was founded in India in 2008 to bring together scientists and technologists, researchers, and activists to collaborate on challenges faced by countries in the Global South, but particularly India, in areas like education, the sciences and the arts, e-governance, intellectual property and other sectors that impact our digital knowledge society.

Our members have been working in the area of telecommunications and Internet governance for over 10 years now and have in the recent past contributed to internet / Internet governance / telecommunication related issues in India inter alia through the following:

- (a) Comments to the Law Commission of India Consultation Paper on Media Law dated May 21, 2014;
- (b) Comments to the Department of Electronics and Information Technology on the Framework for Open Source Software Adoption in E-Governance Systems, 2013

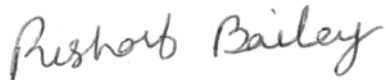
- (c) Comments to the Department of Telecommunications on India's proposals for amendment of the ITU's International Telecommunication Regulations, 2012
- (d) Deposition before the Subordinate Committee on Legislation, Lok Sabha, on the Information Technology (Intermediary Liability Guidelines), Rules, 2011
- (e) Writing papers and appearing on various news channels to discuss Internet governance and telecommunication related issues (for example, in publications such as Economic and Political Weekly, The Hindu, Frontline etc.)
- (f) We have also held various educational and awareness raising workshops and training sessions across India.

Further details about the organization can be found on our website www.knowledgecommons.in

In the circumstances, and given our area of expertise, we hope you will consider our comments favourably.

Finally, we would also like to thank the TRAI for ensuring that public opinion from interested parties is sought prior to creating or adopting any new framework for regulation of the online space in India, a sector that is vital for the continued development of a vibrant democracy.

Yours sincerely,



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[Cc: by email to advqos@traigov.in]