



JAPAN ELECTRONICS AND INFORMATION TECHNOLOGY INDUSTRIES ASSOCIATION

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Mr. Shri Ram Narain
DDG (Security)
Ministry of Communications & Information Technology
Department of Telecommunication

Comments on India's Draft National Telecom Security Policy

Dear Mr. Narain:

The Japan Electronics and Information Technology Industries Association (JEITA) appreciates the opportunity to provide comments on the National Draft Telecom Security Policy released by the Department of Telecommunications. We welcome the Government of India's proactive efforts to improve telecommunications network security. We also support the policy principles of stakeholder involvement and international cooperation, and are pleased to note the reference to the creation through this policy of a "robust modern telecom network with sound international security standards." India's telecommunications sector has been growing at a remarkable pace, but innovation promotion and globalization will be critical elements in sustaining that advance. We strongly urge India to opt for an open approach and pursue internationally harmonized policies and systems. Our specific comments are as below.

Specific Comments

V 3.1 Vulnerabilities and Threats to Telecom Network:

(a) 'Safe to connect' Policy

The draft policy states that under this policy all telecom network elements will be allowed to connect to the network after being tested in security testing labs certified and authorized by a National Telecom Security Certifying Organization.

It is not international practice for a state to require security testing of all telecom network elements, and an excessive evaluation and certification scheme threatens to push up costs and hamper the prompt market injection of the latest technologies. Such policies tend to disadvantage consumers and also create security vulnerabilities. As a member of the CCRA, an international mutual recognition agreement on information security evaluation and certification, the Government of India should allow the utilization not only of Indian testing labs but of any testing lab that conforms to international standards.



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V 3.1(e)

The national draft states that both hardware and software will be inducted from trusted sources. However, the definition of “trusted sources” is unclear, and further clarification is needed to be provided to ensure that the products of foreign firms are not unfairly excluded as a result of this reference.

V 3.1(f)

The draft notes that equipment vendors and telecom service providers will be suitably engaged with the aim of boosting India’s domestic manufacturing capacity.

This could result in vendors and TSPs giving preference to domestic products in their product procurement, or requiring technology transfer or the disclosure of intellectual property as conditions for procuring products from foreign firms. Providing incentives in any form in relation to market access for domestic products can obstruct innovation and might even reduce India’s international competitiveness. We urge the Government of India to aim for an open market which provides a level playing field for domestic and foreign firms as the basis for achieving a robust and safe telecom security network.

V3.1(g)

The draft instructs all telecom network operators to put in place sound access systems consistent with the guidelines given by the Government.

The definition here of “sound access systems” is unclear, and further clarification is needed.

V3.9 Capacity Building

We would be happy to cooperate in building India’s security capacity, but as we observed in relation to V 3.1, we would prefer that rather than capacity-building through the creation of a unique security evaluation and certification system, India adopts an approach that conforms to international standards and international practice.

Sincerely,

Masatoshi Tsuchiya
Vice President, International Affairs Department
Japan Electronics & Information Technology Industries Association (JEITA)