

Comments/Feedback on Draft National Geospatial Policy 2016
by
SAMA (Survey and Mapping Association)

Draft "National Geospatial Policy [NGP] – 2016" is a very progressive and comprehensive policy frame work for geospatial industry. SAMA (Survey and Mapping Association) would like to express a sincere appreciation to this laudable effort. Being first of its kind (and none similar being available) it will be good if the policy charts out a vision, rationale and sets a direction to the use of Geospatial technologies in the context of its advantages for various verticals / decision support / Digital India / Smart Cities/ g-Governance etc.

Apparently there are only few areas where some reconsideration/modification is needed in this draft according to informal feedback received by SAMA from the industry players.

These suggestions are briefly enumerated below in succeeding paras.

In principle Classification of Geospatial Data

NGP clause 1.4 Principles states that Geospatial data of any resolution being disseminated through agencies and service providers, both internationally and nationally be treated as unclassified and made available and accessible by Indian Mapping and imaging agencies.

Submission by SAMA: This clause is in conflict with the proposed draft Geospatial Information Regulation Bill.

Applicability

NGP clause 1.5.2 states that the policy is applicable to geospatial data based products, solutions and services offered by governments, private organizations, NGOs and individuals.

Submission by SAMA: The clause should mention academia and R & D institutions which are missing. Several educational institutions in India are carrying out projects.

Standards & Quality

NGP clause 1.7 states that all GDPSS should conform to national and international standards such as BIS, [LITD22], NSDI, ISO and OGC.

Submission by SAMA: Not all standards are harmonized, nor there is a standard procedure/guidelines yet. As we would be looking at seamless data sets eventually, how will the differences between these standards be dealt with while merging large scale maps and feature lists? It's suggested to adhere to one standard. Since the adoption is relatively low at this stage, identifying a suitable standard and adopting it may be considered as well.

Guidelines for Acquisition of data

NGP clause 1-8 Implementation guidelines states that All clearances / permits, as necessary, for data acquisition and dissemination be through a single window, online portal. These clearances be provided within a time span of 30 days of filing the online request. Otherwise, the clearance is deemed to have been issued. In this context e would like to submit that

Submission by SAMA: Indian geospatial industry is a fairly matured industry and can be expected to behave responsibly with self-regulatory guidelines. It may be considered that after a due permission (whether as licensee or as a registered body) the data acquired/developed by the concerned company can be put to commercial use simultaneous to its submission for vetting. Clear self regulating guide lines will help meeting the industry need of quick commercial usage of data it acquires and security concerns for data to be eventually vetted. The objectionable elements in data (if any) found in violation to guidelines will render company liable for punitive measures as per government guidelines. Self regulation by the industry may also be considered simultaneous to government vetting and clearance for acquisition and dissemination of geospatial data.

Feature Based Classification

In the NGP clause 1-8 Implementation guidelines one of the point states that; As classification is to be done based on features, existing area restrictions will cease for all resolutions(scales). Printed maps will have features obliterated, if classified.

Submission by SAMA: In the interest of national security the present concept of keeping certain geographies restricted and prohibited areas for access to ground survey and mapping, should continue. For the other areas the feature based classification can be applied which takes care of security concerns of VA/VPs in such open geographies.

Ground Based Data Collection

In the NGP clause 1-8 Implementation guide lines one of the point states that Ground based data collection for surveying, mapping and attributes be permitted as per the guidelines to be made available. Technologically, a Continuously Operated Reference Stations network (CORS) be available with access control based on accuracy as specified in another para in NGP.

Submission by SAMA: Through our informal interactions within the industry, SAMA has compiled some of the existing restrictive clauses communicated to various companies by MoD which are attached as Annexure. The rationale and necessity of these clauses need to be reviewed as they are in conflict with the overall perspective of NGP.

Usage of Emerging Technologies

In the NGP clause 1-8 Implementation guide lines one of the point states that GDPSS will be inclusive of all emerging and contemporary technologies such as UAVs, LIDAR, Mobile Mapping, Terrestrial LIDAR, GPR, crowd sourcing and geospatial cloud, etc.

Submission by SAMA: The present set of restrictions issued by MoD on permitting/restricting various technologies is based on the premise that technologies that provide data capture with relatively higher accuracy can enable a hostile action with precision. Therefore, in the interest of national security it is very important to give a generic identification to those geographies and feature class for which such accurate data collection for public consumption is not permitted. There being no restriction for other areas save those geographies and features which are considered restricted for any type of data collection for unrestricted publishing.

Regulatory bodies

In the NGP clause 1-9 Implementation Committees it is stated that to enable coordination between various Government departments / agencies and to promote and coordinate access to and sharing of GDPSS the Steering Committee (SC) is to be constituted.

Submission by SAMA: Since Geospatial Information Regulation Bill also stipulates setting up various committees, it is submitted that functioning of committees suggested in both NGP and Geospatial Information Regulation Bill be examined and a holistic unified regulatory body be brought into existence with adequate representation of Industry and Academia in various committees forming part of the regulatory body.

Annexure to Comments/Feedback on
National Geospatial Policy [NGP 2016]

COMPILATION OF MoD INSTRUCTIONS ON SECURITY VETTING OF

MAPS/STREET VECTORS/POIS/VISUALS/STREET FURNITURE/PANOS (GEOSPATIAL DATA)

Policy Directives: These have been collated from the correspondence with MoD. The statements within double inverted commas are verbatim from MoD references. Statements without quotes imply words to that effect. This is to avoid cluttering that would have occurred if, verbatim from MoD letters were to be quoted

S No	Policy Directive	Reference	Remarks
1	*. "Final Maps will be security vetted by SOI prior to their dissemination to end user" *. "All Public Domain Geospatial Data would require security clearance of MoD and MHA before its public dissemination"	A MoD letter issued in 2007.	But in practice Security vetting of Final Maps by Sol prior to dissemination is not being undertaken by Sol.
2	*. "...may prepare Navigational Maps using satellite imageries purchased from NRSA for public navigational systems and exclusively authorized to put the data in public domain by NRSA" *. "Street networks are part of the Geospatial data & hence require security clearance. Further, its dissemination & uses is required to be carried out within the broad frame work of National map policy"	A MoD letter issued in 2007.	Proof of purchase of satellite imagery from NRSC can be asked by MoD if they desire. Street networks as part of geospatial data also implies, POIs. Interestingly with the same logic photographs can also be treated as geospatial data and hence same status and process of vetting can be applied for security clearance for photographic layer but photographic survey is now being prohibited by MoD.
3	*" International Boundary/Coast line appearing on the proofs would need to be authenticated by the Director, Map publication, SOI Dehradun before final printing"	A MoD letter issued in 2008.	Earlier Sol use to provide digital boundaries as 1:4M scale and probably now they have improved it to 1:1M scale (not sure). IB for any other digital scale usually needs large number of alteration

			by Sol before its cleared.
4	<p>*Value addition to already cleared street vectors or POI which are cleared by MoD for unrestricted publication should not be done without approval of MoD</p> <p>*All value added products are required to be resubmitted to MoD for further security clearance. The purpose for which it (Value added product) is to be used should be mentioned</p> <p>*" Publication of Maps in the Web or Internet will require clearance from MoD and SOI"</p>	A MoD letter issued in 2008.	This restriction on MoD approval for value addition to be looked into. According to informal feedback from the industry, MoD wants not only wants to vet the data but also needs the value added data with the context.
5	<p>*" Oil refineries, Oil/Gas Pipe Lin, On and Off shore drilling projects and depots, Commercial Oil Stations constitute Civil Vas & VPs and will not be shown in the public domain maps. However, Petrol Pumps serving as civil Commercial shops without internal details can be shown as POIs for publication in Street vectors"</p>	A MoD letter issued in 2008.	In an informal feedback from industry, it was mentioned that they were instructed not to mention PP outlet names like HP, Indian Oil, BP etc
6	<p>In cases where permission was asked for large number of cities at a time the following additional stipulation was also placed by MoD besides other routine restriction on field Svy:</p> <p>*"The Companies will submit to MoD half yearly Svy Plan along with the details of Surveyors likely to be engaged"</p>	A MoD letter issued in 2009.	This half yearly survey plan and feedback on survey makes the process cumbersome.
7	<p>No photographs to be carried out near the vicinity of military establishments & VAs/VPs and the areas where photography is prohibited</p> <p>No areal photos/Satellite imagery will be added as visuals.</p> <p>The publisher has to submit a certificate of adherence of the above mentioned stipulations to MoD within three months from the date of this letter, failing which the permission will be treated as cancelled</p>	A MoD letter issued in 2012.	MoD approach on photographic survey has been rather subjective and varies from time to time and also with the incumbents in the clearance process.