



VIL/LT/16-17/400  
23 September 2016

Telecom Regulatory Authority of India,  
MTNL Telephone Exchange Building,  
Jawahar Lal Nehru Marg  
New Delhi- 110 002

Kind Attention : Mr. Arvind Kumar-Advisor (BB&PA)  
Subject : Augmentation of POIs with M/s RJIL-reg  
Reference : Your letter No.10-6/2016-BB&PA dated 19.09.2016

*TRAI*  
*26/09/16*

Dear Sir,

This is with reference to Your letter No.10-6/2016-BB&PA dated 19.09.2016 on the above captioned subject.

1. At the outset, we would like to thank the Authority for the meeting on 9 September 2016, where the issues between parties were discussed freely and frankly.
2. At our end, there was lack of clarity on whether Reliance Jio had actually launched commercial services or were still operating in a test phase, due to letters received as late as 6 September 2016. It may be appreciated that several of our concerns were arising on account of the fact that commercial services were being offered under the garb of testing, thus being beyond the purview of license and regulatory provisions and compliance. We are glad that this issue was clarified by the Jio representative that the services had been commercially launched by them on 5 September 2016 and that tariffs had also been filed with TRAI.
3. We have also written to TRAI on 12 September 2016 and 16 September 2016 regarding **key concerns that were raised by us in the meeting and we look forward to an expeditious consideration of these underlying broader issues.**
4. In respect of POI augmentation demands by Jio, we would first like to assure the Authority that the requests for augmentation will be addressed within the framework of our interconnect agreement. To this effect, there has been a series of correspondence and meetings between us and Jio, both prior to post 9 September 2016 meeting held in TRAI. A set of correspondence with Jio post the meeting on 9 September 2016 is enclosed for your reference (Annexure I).
5. However, at this juncture itself, we would like to respectfully submit that we have strong objection to and disagree with Jio's position that the Interconnection Agreement provides for Internet Telephony. The Agreement signed by us does not and could not include Internet Telephony. When the TRAI is consulting on the issue and also raising the issue of termination charges, we fail to understand how an Interconnect Agreement signed two years prior, can be even said to cover Internet Telephony.

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Our concerns with regard to the said consultation have already been raised with TRAI. We submit that no internet telephony traffic is allowed under existing interconnection agreement and any projections, which include such traffic, are incorrect.

6. Further, the routing of the calls over POIs in some scenarios by Jio is questionable and is, in our view, in violation of interconnection agreement and also of license conditions, inasmuch as with a Jio 4G SIM in a 2G/3G handsets and a Jio SIM in the Jio WI device
  - a. calls made from the Jio Sim in the handset to a Vodafone number were completed with the A party No. being the one in the 2G/3G handset
  - b. Calls made from the Vodafone number to the Jio SIM in the handset were set up but not completed, [call disconnected when the answer button was pressed] and an immediate missed call alert was sent to the Jio number in the handset .

In none of the above cases was the Jio number in the JioWi device being displayed, thus undermining the credence of claims that the handset is acting only as a dialer.

Our concerns regarding this wrongful routing have been shared with Jio and the same are also explained in **Annexure II** of this letter. We are also providing video and CDRs for the same.

7. When we gave this feedback on such wrong call routing to Jio in our 13 September 2016 meeting, their representatives expressed surprise on such calls being set up and admitted that this is wrong routing and that the handset is being used only as a dialer for the Jio SIM in the JioFI device. They assured us that if this is happening then this will be stopped.

However, we find reference to such type of calls again by them in para 2(ii) (g) their latest response to us, dated 19 September 2016, wherein they have ambiguously stated that calls will go through even if there is a Jio 4G SIM in the 2G/3G handset

We submit that we are concerned about such statements which unnecessarily requires us to be constantly concerned about whether or not the calls are being wrongly routed.

We maintain that we are within our rights under the interconnect agreement to take suitable action.

8. Without prejudice to our contentions, we wrote to Jio again on 16 September 2016, after meeting them on 13 September 2016, stating that while all the broader issues require a fair closure to enable a consistent framework, level playing field to all service providers and resolving issues regarding scope of interconnection agreement, we are working in earnest to resolve the POI issues, but it may take some time. We further stated that it is with this understanding and expectation that the broader issues will be addressed and only in deference to TRAI that we have initiated the discussions on the POI augmentation and have decided for an addition to POIs in a reasonable time.
9. However, even after our communication on 16 September 2016 that we are ready to discuss modalities for additional POIs at the time convenient to them, we again got the letter on POIs again on 17 September 2016, which carried no reference to our communications. We wrote to Jio about the same and requested them to stop sending mechanical letters. The meeting was then fixed for 20 September 2016 by Jio. However, on 19 September 2016 we received a response from their side on issues pertaining to



Interconnection Agreement and one more mechanical letter on POI augmentation. In none of these letters is Jio noting the discussions, correspondence or meetings with Vodafone on the issues.

10. In meeting held on 20 September 2016, we caveated the discussion on POI with our objection to Jio's position that Interconnection Agreement allows for Internet Telephony and reserved our right to reply to Jio's letter of 19 September 2016. In that meeting we were told that the calling from 2G/3G smartphone having 4G Jio SIM with assistance from App and JioFi having different 4G Jio SIM has been stopped. However, we submit that we are not sure of the actual position or the future behavior since such calls were being set up earlier as demonstrated above and even their letter of 19 September 2016 mentions that such calls are being made.
11. In the said meeting on 20 September 2016, augmentation of 861E1s was tabled by us, including local outgoing/ incoming and NLD) and accordingly we sent mail to them after the meeting (copy attached as (Annexure III), along with a corrigendum mail for NLD POI circle wise break up). We are taking all steps expeditiously and respective demand notes have been issued in most circles and rest will be completed by today. We reiterate that such augmentation is without prejudice to our contentions as submitted above, and Jio is duly informed about the same.

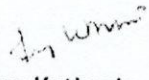
We hope this explains the development after the meeting in TRAI on 9 September 2016.

Further, as required please find enclosed the traffic report (Annexure IV).

Thanking you.

Yours Sincerely,

For **Vodafone India Limited and  
Vodafone Mobile Services Limited.**

  
**Sundeep Kathuria  
Authorised Signatory**

ENCL:

**Annexure-I-**

1. Vodafone letter No. VIL/LT/16-17/370 dated 12.09.2016
2. RJIL Letter No. RJIL/Vodafone/2016-17/629 dated 15.09.2016
3. Vodafone letter No. VIL/LT/16-17/379 dated 16.09.2016
4. RJIL Letter No. RJIL/Vodafone/2016-17/643 dated 17.09.2016
5. Vodafone e-mail dated 19.09.2016
6. RJIL letter No. RJIL/Vodafone/2016-17/665 dated 19.09.2016
7. RJIL letter No. RJIL/Vodafone/2016-17/654 dated 19.09.2016

**Annexure-II**

1. Explanation of our concerns regarding wrongful routing with Jio & CDRs
2. Copy of Videos in CDs

**Annexure-III**

1. Copy of our e-mails dated 20.09.2016 & 21.09.2016 to Jio.

**Annexure-IV**

1. Details of traffic from 15.09.2016-19.09.2016



VIL/LT/16-17/370  
12 September 2016

**Mr. Kapoor Singh Guliani**  
**Reliance Jio Infocomm Limited**  
D-7, Dhawandeep Building  
6, Jantar Mantar Road  
New Delhi – 110 001

**Subject:** Meeting regarding Interconnection and Augmentation of PoIs in TRAI  
**Reference:** TRAI Letter No. 10-6/2016 – BB&PA dated 07.09.2016

Dear Sir,

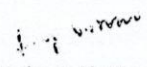
This refers to the meeting called by TRAI on the above subject on 9 September 2016.

Please find attached a copy of your letter dated 06 September 2016 which refers to the service as a test service, which was brought to TRAI's and your attention in the meeting.

Further, as agreed in the meeting, we request Jio to kindly provide the necessary confirmations on the below-mentioned issues, so that we are able to take suitable next steps in this regard –

1. date of commercial launch of services by Jio
2. discontinuation of calling to/from 2G /3G devices using Jio's 4G SIM in any manner

Thanking you,  
For Vodafone India Limited and  
Vodafone Mobile Services Limited

  
**Sundeep Kathuria**  
Authorised Signatory

ENCL: RJIL letter dated 06 September 2016

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RJIL/Vodafone/2016-17/595

September 6, 2016

To

Mr. Sundeep Kathuria,  
Executive Vice President- Policy & Regulation,  
Vodafone India Limited,  
7<sup>th</sup> Floor, DLF Centre, Sansad Marg,  
New Delhi-110001

Subject: Augmentation of POIs for Access and NLD Services-reg.

Reference: 1. RJIL letters dated 21.06.2016, dated 05.07.2016, dated 08.07.2016, dated 09.07.2016, dated 11.07.2016, dated 12.07.2016 and dated 13.07.2016  
2. Vodafone letter dated 13.07.2016.  
3. Vodafone email dated 14.07.2016  
4. RJIL letters dated 14.07.2016, dated 15.07.2016, dated 16.07.2016, dated 18.07.2016, dated 19.07.2016, dated 21.07.2016, dated 22.07.2016, dated 23.07.2016, dated 25.07.2016, dated 26.07.2016, dated 27.07.2016, dated 28.07.2016, dated 29.07.2016, dated 30.07.2016, dated 01.08.2016, dated 02.08.2016, dated 03.08.2016, dated 04.08.2016, dated 05.08.2016, dated 06.08.2016, dated 08.08.2016, dated 09.08.2016, dated 10.08.2016, dated 11.08.2016, dated 13.08.2016, dated 16.08.2016, dated 17.08.2016, dated 18.08.2016, dated 19.08.2016, dated 21.08.2016, dated 22.08.2016, dated 23.08.2016, dated 24.08.2016, dated 25.08.2016, dated 26.08.2016, dated 27.08.2016, dated 29.08.2016, dated 30.08.2016, dated 31.08.2016, dated 01.09.2016, dated 02.09.2016, dated 03.09.2016, dated 04.09.2016 and dated 05.09.2016

Dear Sir,

1. This is in continuation to the aforementioned letters by Reliance Jio Infocomm Limited (RJIL) requesting you to direct your teams to urgently issue demand notes for augmenting the POI E1 capacities as per the demands made by RJIL.
2. We have noted the points raised in your letter dated 13.07.2016 and have already shared a point-wise reply on 16.07.2016. However this letter is to bring to your



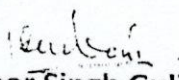


kind attention the exceedingly high levels of call overflows and POI congestion on a daily basis. This is also to seek your response to the firm demand for augmentation of POIs based on RJIL projections, as requested vide our letter dated 21.06.2016. In that respect, we regret to note that the response from your side is grossly insufficient and inadequate.

3. We once again reiterate that this unreasonable delay from your side is leading to heavy congestion at most of the POIs and poor user experience for your subscribers as well as our test users. We are enclosing a table of the POIs indicating the busy hour utilization as Annexure-A and call overflow / failure as Annexure-B as on **September 4, 2016** for your reference. These clearly highlight the gravity of the situation.
4. We hereby request you to issue immediate instructions to your field units to issue demand notes for POI augmentation at the earliest.

Thanking you,  
Yours sincerely,

For Reliance Jio Infocomm Limited,

  
**Kapoor Singh Guliani**  
Authorized Signatory



Enclosures: As above

**Copy for Information to:**

1. **Secretary (T)**, Department of Telecommunication, Sanchar Bhawan, 20, Ashoka Road, New, Delhi- 110001.
2. **Chairman**, Telecom Regulatory Authority of India, Mahanagar Doorsanchar Bhawan, J.L. Nehru Marg, Old Minto Road, New Delhi – 110002.



# Annexure-A – Vodafone-RJIL POI Busy Hour Utilization

S. No.	Circle	POI TYPE	5th Sep 2016				Utilization - Busy Hour (%) with GoS (0.2%)
			Working EIs	Under Augmentation	EIs Approved as on 5th Sep.	Total EIs post Augmentation	4th Sept
1	AP	LOCAL	23	0	0	23	107.58%
2	AS	LOCAL	14	0	0	14	110.78%
3	BH	LOCAL	15	0	0	15	110.80%
4	CG	LOCAL	16	0	0	16	103.76%
5	CH	LOCAL	8	0	0	8	108.50%
6	DL	LOCAL	22	5	0	27	-
7	GJ	LOCAL	30	0	0	30	106.41%
8	HP	LOCAL	7	0	0	7	67.67%
9	HR	LOCAL	18	0	0	18	-
10	JH	LOCAL	8	0	0	8	115.86%
11	JK	LOCAL	5	0	0	5	85.22%
12	KL	LOCAL	10	0	0	10	113.42%
13	KN	LOCAL	9	0	0	9	114.35%
14	KOL	LOCAL	9	0	0	9	114.44%
15	MH	LOCAL	8	10	0	18	116.92%
16	MP	LOCAL	17	0	0	17	102.08%
17	MU	LOCAL	12	0	0	12	111.81%
18	NE	LOCAL	7	0	0	7	114.87%
19	OR	LOCAL	17	2	0	19	109.38%
20	PB	LOCAL	20	0	0	20	108.46%
21	RJ	LOCAL	12	2	0	14	107.60%
22	TN	LOCAL	9	0	0	9	114.47%
23	UPE	LOCAL	20	10	0	30	-
24	UPW	LOCAL	9	0	0	9	114.43%
25	WB	LOCAL	14	0	0	14	110.67%
26	AP	NLD	4	0	0	4	124.32%
27	AS	NLD	3	0	0	3	130.49%
28	BH	NLD	5	1	0	6	121.54%
29	CG	NLD	1	0	0	1	169.66%
30	CH	NLD	2	0	0	2	132.10%
31	DL	NLD	18	0	2	20	109.09%
32	GJ	NLD	5	0	0	5	121.41%
33	HF	NLD	2	0	0	2	124.12%
34	HR	NLD	5	1	0	6	121.46%
35	JH	NLD	-	-	0	-	-
36	JK	NLD	1	0	0	1	167.39%
37	KL	NLD	2	0	0	2	140.74%
38	KN	NLD	4	0	0	4	124.93%
39	KOL	NLD	4	0	0	4	125.02%
40	MH	NLD	7	0	0	7	116.94%
41	MP	NLD	5	0	0	5	121.25%
42	MU	NLD	7	0	0	7	116.97%
43	NE	NLD	2	0	0	2	139.75%
44	OR	NLD	4	0	0	4	124.68%
45	PB	NLD	6	0	0	6	118.89%
46	RJ	NLD	9	0	0	9	114.43%
47	TN	NLD	2	0	0	2	148.95%
48	UPE	NLD	9	20	0	29	114.52%
49	UPW	NLD	10	0	0	10	113.43%
50	WB	NLD	6	0	0	6	118.65%





## Annexure B – Vodafone – RJIL POI Call Failure / Overflow status

S. No.	Circle	POI TYPE	5th Sep 2016				Overflow Count
			Working EIs	Under Augmentation	EIs Approved as on 5th Sep	Total EIs post Augmentation	4th Sept
1	AP	LOCAL	23	0	0	23	573964
2	AS	LOCAL	14	0	0	14	336206
3	BH	LOCAL	15	0	0	15	0
4	CG	LOCAL	16	0	0	16	12466
5	CH	LOCAL	8	0	0	8	1743
6	DL	LOCAL	22	5	0	27	-
7	GJ	LOCAL	30	0	0	30	2049972
8	HP	LOCAL	7	0	0	7	0
9	HR	LOCAL	18	0	0	18	-
10	JH	LOCAL	8	0	0	8	1011133
11	JK	LOCAL	5	0	0	5	0
12	KL	LOCAL	10	0	0	10	307843
13	KN	LOCAL	9	0	0	9	427823
14	KOL	LOCAL	9	0	0	9	453735
15	MH	LOCAL	8	10	0	18	867503
16	MP	LOCAL	17	0	0	17	55296
17	MU	LOCAL	12	0	0	12	517946
18	NE	LOCAL	7	0	0	7	2265
19	OR	LOCAL	17	2	0	19	277723
20	PB	LOCAL	20	0	0	20	654250
21	RJ	LOCAL	12	2	0	14	888618
22	TN	LOCAL	9	0	0	9	581612
23	UPE	LOCAL	20	10	0	30	-
24	UPW	LOCAL	9	0	0	9	943367
25	WB	LOCAL	14	0	0	14	944859
26	AP	NLD	4	0	0	4	10753
27	AS	NLD	3	0	0	3	36544
28	BH	NLD	5	1	0	6	555103
29	CG	NLD	1	0	0	1	22612
30	CH	NLD	2	0	0	2	858
31	DL	NLD	18	0	2	20	607539
32	GJ	NLD	5	0	0	5	198085
33	HP	NLD	2	0	0	2	227
34	HR	NLD	5	1	0	6	213429
35	JH	NLD	-	-	0	-	-
36	JK	NLD	1	0	0	1	2813
37	KL	NLD	2	0	0	2	12608
38	KN	NLD	4	0	0	4	86378
39	KOL	NLD	4	0	0	4	91946
40	MH	NLD	7	0	0	7	63253
41	MP	NLD	5	0	0	5	0
42	MU	NLD	7	0	0	7	0
43	NE	NLD	2	0	0	2	4475
44	OR	NLD	4	0	0	4	29833
45	PB	NLD	6	0	0	6	98437
46	RJ	NLD	9	0	0	9	374197
47	TN	NLD	2	0	0	2	57569
48	UPE	NLD	9	20	0	29	1093008
49	UPW	NLD	10	0	0	10	212579
50	WB	NLD	6	0	0	6	333583







RJIL/Vodafone/2016-17/629

September 15, 2016

To

Mr. Sundeep Kathuria,  
Executive Vice President- Policy & Regulation,  
Vodafone India Limited,  
7<sup>th</sup> Floor, DLF Centre, Sansad Marg,  
New Delhi-110001

Subject: Augmentation of POIs for Access and NLD Services

Reference: 1. RJIL letter dated 02.09.2016, intimating commencement of service  
2. TRAI meeting dated 09.09.2016 on delay/denial of POI augmentation to RJIL by Airtel, Idea and Vodafone  
3. Daily letters by RJIL, informing about the massive call-failures and exceedingly high POI congestion being faced by RJIL users since 08.07.2016  
4. RJIL firm demand dated 21.06.2016

Dear Sir,

1. This is in continuation to our regular follow up with you and your concerned circle teams for POI augmentation for over 8 months.
2. As you are aware, TRAI had at the aforementioned meeting held on 09.09.2016, directed us to work together and bring down the POI congestion at each of the POIs to the permissible benchmark of <0.5% in accordance with the Standards of Quality of Service of Basic Telephone Service (wire line) and Cellular Mobile Telephone Service Regulations, 2009 ("QoS Regulations").
3. It is submitted that adequate interconnection is a prerequisite for RJIL and other TSPs to ensure quality of service to their respective subscribers in accordance with prescribed TRAI Regulations/ Directions. This has also been specifically stated by TRAI in its Direction No. 406-10/2005-I&FN (Vol. II) dated 25.10.2011. We further submit that your continued denial of sufficient interconnection is also in violation of Clauses 27.4 and 29.1 of Part-I, Chapter-IV and Clause 6.2 of Part-II, Chapter-VIII of the Unified License.
4. We further submit that RJIL has been doing its best to ensure collaborative solutions to inter-connection related issues with all partners in order to ensure that the interest of the

Reliance Jio Infocomm Limited, CIN: U72900MH2007PLC234712

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Registered Office: 9th Floor, Maker Chambers IV, 222, Nariman Point, Mumbai - 400021, India. Tel: 022-22785000



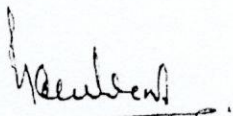
subscribers are safeguarded as first priority. We started by informing all of the interconnected partners of the impending increase in traffic usage of RJIL's subscribers on a regular basis and forecasted the step-wise E1 requirements at each POI.

5. We are enclosing a table depicting the traffic and call failure during the busy hour and during all 24 hours for **September 13, 2016**, at each of our POIs as Annexure-A. This table clearly shows the gravity of the situation. We request you to take all steps to ensure compliance with TRAI Regulations on QoS at the earliest.
6. In order to ensure the immediate release of E1s, we reiterate that we are willing to provide requisite Bank Guarantee against the demand notes to be issued for all of our indented POI demand as per letter dated 21.06.2016. It is earnestly requested that you start releasing POI capacities forthwith per the said RJIL's indented demand and complete at the soonest. As you are aware, for each day delayed, QoS will continue to be in non-compliance with TRAI Regulations. Needless to state, RJIL is willing to extend its cooperation to do all the needful and fulfil its legitimate obligations.
7. We hereby request you to issue immediate instructions to your field units for POI augmentation at the earliest.

Thanking you,

Yours sincerely,

For Reliance Jio Infocomm Limited,



Kapoor Singh Guliani  
Authorized Signatory

Enclosures: As above



## Vodafone

S. No.	Circle	POI TYPE	Day					BH				
			Outgoing Call Attempts	Failed Call Count	% Failure	Outgoing Erlang	Incoming Erlang	Outgoing Call Attempts	Failed Call Count	% Failure	Outgoing Erlang	Incoming Erlang
1	AP	Local	1940441	1541485	79.44%	10336.7	1607.67	185424	160853	86.75%	604.05	103.05
2	AS	Local	1207724	939742	77.81%	7463.94	925.89	42565	38820	91.20%	419.47	12.08
3	BH	Local	2210602	1688177	76.37%	12001.4	1550.67	149457	133804	89.53%	651.53	46.53
4	CH	Local	257196	137618	53.51%	3320.44	715.75	26330	18359	69.73%	197.86	46.86
5	DL	Local	3009445	2310495	76.77%	10873.8	1648.89	119476	101819	85.22%	583.47	90.09
6	GJ	Local	2813761	1669959	59.35%	13731.6	3159.36	194459	159967	82.26%	802.03	122.06
7	HP	Local	63437	288	0.45%	1968.22	340.5	4171	0	0.00%	153.75	26.61
8	HR	Local	1728177	1299879	75.22%	8452.64	1478.67	118508	103669	87.48%	487.64	67.36
9	JK	Local	54948	3252	5.92%	1912.42	245.39	2990	882	29.50%	137.89	9.64
10	KL	Local	659553	446543	67.70%	4712.78	978.11	26684	20268	75.96%	272.03	34.97
11	KN	Local	1300570	1123417	86.38%	4370.53	849.97	112349	102068	90.85%	233.11	42.25
12	KOL	Local	1172418	976204	83.26%	4066.14	1308.31	35509	31840	89.67%	230	44.44
13	MH	Local	618148	536627	86.81%	1251.19	518.39	202250	185397	91.67%	117.17	95.42
14	MP	Local	1240113	786743	63.44%	14176.1	1608.53	158078	121191	76.67%	870.52	103.02
15	MU	Local	1701135	1293282	76.02%	6164.19	414.94	129710	105746	81.52%	352.28	7.33
16	NE	Local	132195	41933	31.72%	2966.44	504.14	25011	21501	85.97%	191.44	20.53
17	OR	Local	1014260	806358	79.50%	9613.92	1244.22	53642	46758	87.17%	541.83	42.06
18	PB	Local	2039382	1787646	87.66%	11024.8	363.92	53442	47725	89.30%	610.11	5.06
19	RJ	Local	2061342	1903616	92.35%	6268.5	1696.75	61996	50636	81.68%	339.42	79.53
20	TN	Local	1399617	1192428	85.20%	4500.16	737.52	119601	113028	94.50%	249.55	24.78
21	UPE	Local	1493764	1316912	88.16%	7452.11	1956.11	120346	109351	90.86%	462.78	151.17
22	UPW	Local	1508847	1376414	91.22%	4593.75	926.81	142516	137361	96.38%	243.25	32.03
23	WB	Local	1667274	1375876	82.52%	7151.08	1620.28	45733	41441	90.62%	387.75	43.19
24	AP	NLD	127807	96677	75.64%	2083	0	13722	12537	91.36%	122.54	0
25	AS	NLD	132423	109933	83.02%	1784	0	18375	17666	96.14%	90.74	0
26	BH	NLD	882408	851599	96.51%	3384	0	314	0	0.00%	164.45	0
27	CH	NLD	30727	13738	44.71%	937	0	3846	3096	80.50%	59.55	0
28	DL	NLD	1399810	1279099	91.38%	10519	0	32501	28973	89.14%	552.78	0
29	GJ	NLD	190871	167687	87.85%	1473	0	32372	30129	93.07%	152.29	0
30	HP	NLD	28575	10270	35.94%	928	0	3225	2501	77.55%	60.51	0
31	HR	NLD	519779	486218	93.54%	2820	0	48338	47420	98.10%	151.67	0
32	JK	NLD	13420	6132	45.69%	428	0	1945	1545	79.43%	29.54	0
33	KL	NLD	47742	27503	57.61%	995	0	5995	5121	85.42%	59.58	0
34	KN	NLD	309312	281912	91.14%	2285	0	20485	19718	96.26%	121.7	0
35	KOL	NLD	223656	196115	87.69%	2368	0	18405	17535	95.27%	121.68	0
36	MH	NLD	113047	81353	71.96%	1942	0	23262	19769	84.98%	213.85	0
37	MP	NLD	51323	26280	51.21%	1673	0	8319	6195	74.47%	182.02	0
38	MU	NLD	33546	0	0.00%	2032	0	3307	0	0.00%	213.97	0
39	NE	NLD	50658	29528	58.29%	1084	0	6208	5593	90.09%	59.68	0
40	OR	NLD	148019	118456	80.03%	2318	0	10986	10017	91.18%	122.6	0
41	PB	NLD	312665	268183	85.77%	3312	0	22721	21556	94.87%	183.57	0
42	RJ	NLD	697870	643744	92.24%	5210	0	40863	39451	96.54%	276.47	0
43	TN	NLD	132753	120381	90.68%	936	0	12349	11869	96.11%	49.82	0
44	UPE	NLD	1523154	1484337	97.45%	5987	0	69386	68285	98.41%	276.56	0
45	UPW	NLD	638648	579383	90.72%	5830	0	28713	27146	94.54%	305.38	0
46	WB	NLD	581393	523953	90.12%	3644	0	54865	52553	95.79%	175.87	0



VIL/LT/16-17/379  
16 September 2016

**Shri Kapoor Singh Guliani**  
Reliance Jio Infocomm Limited  
D-7, Dhawandeep Building,  
6, Jantar Mantar Road,  
New Delhi-110001

WITHOUT PREJUDICE

**Subject:** Meeting regarding Interconnection and Augmentation of POIs in TRAI  
**Reference:** Our letter dated 12 September 2016 and all previous correspondence on Interconnection Agreement

Dear Sir,

This refers to meeting called by TRAI on the above subject on 9 September 2016 and our letter dated 12.0.2016 seeking confirmations. Post this we had a mutual discussion on 13.09.2016 at your office.

We again request Jio to kindly provide the necessary confirmations. Some of the key issues which have been tabled by us and which are very serious in nature are of free service which is in violation of principles of reporting requirements in the Tariff orders and on internet telephony on which we have detailed communication with Jio with copies to TRAI and DoT.

You will agree that all the issues require a fair closure to enable a consistent framework, level playing field to all service providers and resolve issues regarding scope of interconnection agreement; we genuinely believe that all stakeholders are working with earnest to resolve them but it may take some time. With this belief and expectation and only in deference to TRAI having initiated the discussions on all the relevant issues, we have decided for an addition to POIs in a reasonable time.

We clarify that such one-time augmentation is being done without prejudice to our contentions and it should not be construed as any sort of waiver. This is being done with the expectation of reciprocal action on part of Jio to resolve the concerns and look forward to TRAI for fair actions under its domain.

We are ready to discuss the modalities for additional POIs at time convenient to you.

Thanking you,

**For Vodafone India Limited & Vodafone Mobile Services Limited**

**Sundeep Kathuria**  
EVP- Policy & Regulations

**Vodafone India Limited (CIN-U32200MH1992PLC119108)**  
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New Delhi - 110 001, India. T +91 11 7171 0766, F +91 11 7171 0767  
Regd. Off: Peninsula Corporate Park, Ganpatrao Kadam Marg, Lower Parel, Mumbai - 400 013, India  
T +91 22 7171 5000, F +91 22 2496 3645, Website: www.vodafone.in



RJIL/Vodafone/2016-17/643

September 17, 2016

To

Mr. Sundeep Kathuria,  
Executive Vice President- Policy & Regulation,  
Vodafone India Limited,  
7<sup>th</sup> Floor, DLF Centre, Sansad Marg,  
New Delhi-110001

**Subject: Augmentation of POIs for Access and NLD Services**

- Reference:
1. RJIL letter dated 02.09.2016, intimating commencement of service
  2. TRAI meeting dated 09.09.2016 on delay/denial of POI augmentation to RJIL by Airtel, Idea and Vodafone
  3. Daily letters by RJIL, informing about the massive call-failures and exceedingly high POI congestion being faced by RJIL users since 08.07.2016
  4. RJIL firm demand dated 21.06.2016
  5. RJIL letter dated 15.09.2016

Dear Sir,

1. This is in continuation to our regular follow up with you and your concerned circle teams for POI augmentation for over 8 months.
2. As you are aware, TRAI had at the aforementioned meeting held on 09.09.2016, directed us to work together and bring down the POI congestion at each of the POIs to the permissible benchmark of <0.5% in accordance with the Standards of Quality of Service of Basic Telephone Service (wire line) and Cellular Mobile Telephone Service Regulations, 2009 ("QoS Regulations").
3. It is submitted that adequate interconnection is a prerequisite for RJIL and other TSPs to ensure quality of service to their respective subscribers in accordance with prescribed TRAI Regulations/ Directions. This has also been specifically stated by TRAI in its Direction No. 406-10/2005-I&FN (Vol. II) dated 25.10.2011. We further submit that your continued denial of sufficient interconnection is also in violation of Clauses 27.4 and 29.1 of Part-I, Chapter-IV and Clause 6.2 of Part-II, Chapter-VIII of the Unified License.
4. We further submit that RJIL has been doing its best to ensure collaborative solutions to inter-connection related issues with all partners in order to ensure that the interest of the subscribers are safeguarded as first priority. We started by informing all of the interconnected

Reliance Jio Infocomm Limited, CIN: U72900MH2007PLC234712

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Registered Office: 9th Floor, Maker Chambers IV, 222, Nariman Point, Mumbai - 400021, India. Tel: 022-22785000  
www.jio.com



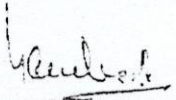
partners of the impending increase in traffic usage of RJIL's subscribers on a regular basis and forecasted the step-wise E1 requirements at each POI.

5. We are enclosing a table depicting the traffic and call failure during the busy hour and during all 24 hours for **September 15, 2016**, at each of our POIs as Annexure-A. This table clearly shows the gravity of the situation. We request you to take all steps to ensure compliance with TRAI Regulations on QoS at the earliest.
6. In order to ensure the immediate release of E1s, we reiterate that we are willing to provide requisite Bank Guarantee against the demand notes to be issued for all of our indented POI demand as per letter dated 21.06.2016. It is earnestly requested that you start releasing POI capacities forthwith per the said RJIL's indented demand and complete at the soonest. As you are aware, for each day delayed, QoS will continue to be in non-compliance with TRAI Regulations. Needless to state, RJIL is willing to extend its cooperation to do all the needful and fulfil its legitimate obligations.
7. We hereby request you to issue immediate instructions to your field units for POI augmentation at the earliest.

Thanking you,

Yours sincerely,

For Reliance Jio Infocomm Limited,

  
Kapoor Singh Guliani  
Authorized Signatory

Enclosures: As above



Vodafone												
S. No.	Circle	POI TYPE	Day					BH				
			Outgoing Overall	Failed Call Count	% Failure	Outgoing Erlang	Incoming Erlang	Outgoing Overall	Failed Call Count	% Failure	Outgoing Erlang	Incoming Erlang
1	AP	Local	1954876	1535412	78.54%	10446.5	1445.14	239085	213659	89.37%	625.83	81.28
2	AS	Local	1343405	1059646	78.88%	7309.64	1034.56	47709	43677	91.55%	415	16.5
3	BH	Local	2322730	1775878	76.46%	12176.8	1450.64	169124	150534	89.01%	646.33	54.67
4	CH	Local	323669	197542	61.03%	3364.42	732.58	33885	26690	78.77%	207	38.08
5	DL	Local	3145969	2396308	76.17%	10854.7	1618.72	141096	121704	86.26%	583.17	90.05
6	GJ	Local	2968170	1817409	61.23%	14013.2	3113.53	164335	135629	82.53%	806.67	117.5
7	HP	Local	71953	1714	2.38%	2128.31	369.72	6571	1012	15.40%	173.28	33.94
8	HR	Local	2000470	1507528	75.36%	8533.03	1445.03	141336	124451	88.05%	485.31	69.72
9	JK	Local	53922	4376	8.12%	1772.5	256.83	4905	1665	33.94%	130.14	19.44
10	KL	Local	796183	568634	71.42%	4767.31	858.5	30441	24027	78.93%	282.53	24.61
11	KN	Local	1456291	1262116	86.67%	4196.64	985.56	114520	106076	92.63%	237.39	38.03
12	KOL	Local	1430839	1197070	83.66%	4123.28	1275.44	41919	37454	89.35%	231.39	42.94
13	MH	Local	3490809	3218076	92.19%	3996.28	1354.36	253674	240168	94.68%	208.86	65.08
14	MP	Local	1485309	1004438	67.62%	14124.2	1652.58	146756	108343	73.83%	853.64	100.5
15	MU	Local	1508950	1124461	74.52%	5760.97	397.11	63263	48076	75.99%	348.86	10.72
16	NE	Local	154599	56667	36.65%	3091.67	541.33	15410	11741	76.19%	191.03	21.11
17	OR	Local	1083255	874736	80.75%	9826.83	1262	31134	26582	85.38%	554.67	29.47
18	PB	Local	2177667	1926699	88.48%	11092.6	368	143399	136541	95.22%	606.67	8.44
19	RJ	Local	2248709	2075449	92.30%	6502.19	1579.89	78640	67470	85.80%	326.97	90.25
20	TN	Local	1511984	1287873	85.18%	4561.78	755.08	107739	98452	91.38%	244.97	29.47
21	UPE	Local	910	910	100.00%	0	0	4	4	100.00%	0	0
22	UPW	Local	887865	795002	89.54%	2889.94	510.48	92826	85071	91.65%	228.66	46.36
23	WB	Local	1786852	1488714	83.31%	7178.11	1677.61	47782	43967	92.02%	389.08	42.31
24	AP	NLD	36825	14021	38.07%	1104	0	5535	3171	57.29%	121.35	0
25	AS	NLD	115550	91800	79.45%	1610	0	18592	17703	95.22%	90.68	0
26	BH	NLD	749219	719197	95.99%	3060	0	41518	40529	97.62%	152.65	0
27	CH	NLD	11331	1113	9.82%	466	0	1920	718	37.40%	56.79	0
28	DL	NLD	486447	399620	82.15%	6096	0	71541	63855	89.26%	551.82	0
29	GJ	NLD	263905	235797	89.35%	2087	0	27482	25457	92.63%	152.34	0
30	HP	NLD	12856	902	7.02%	484	0	1655	216	13.05%	55.7	0
31	HR	NLD	248493	225346	90.69%	1637	0	31589	29678	93.95%	151.43	0
32	JK	NLD	4049	199	4.91%	210	0	659	166	25.19%	26.62	0
33	KL	NLD	21941	8285	37.76%	550	0	3071	1650	53.73%	58.57	0
34	KN	NLD	80786	60218	74.54%	1273	0	14083	12437	88.31%	121.38	0
35	KOL	NLD	214116	181295	84.67%	2043	0	20773	19923	95.91%	121.67	0
36	MH	NLD	143342	97866	68.27%	2783	0	12804	9595	74.94%	213.76	0
37	MP	NLD	83951	48366	57.61%	2368	0	7670	4793	62.49%	181.28	0
38	MU	NLD	42806	0	0.00%	2807	0	3236	0	0.00%	213.9	0
39	NE	NLD	54562	33483	61.37%	984	0	7583	6710	88.49%	59.62	0
40	OR	NLD	142045	114231	80.42%	2135	0	19593	18420	94.01%	122.58	0
41	PB	NLD	115778	85247	73.63%	1858	0	17474	14682	84.02%	183.01	0
42	RJ	NLD	284303	247103	86.92%	2972	0	40254	37225	92.48%	276.03	0
43	TN	NLD	51317	41338	80.55%	543	0	8392	7650	91.16%	49.7	0
44	UPE	NLD	673216	646072	95.97%	3603	0	76932	75104	97.62%	276.45	0
45	UPW	NLD	243546	202635	83.20%	3338	0	29668	26113	88.02%	304.91	0
46	WB	NLD	478582	423720	88.54%	3323	0	33111	30776	92.95%	175.82	0



**From:** Kathuria, Sundeep (COR), Vodafone India  
**Sent:** Monday, September 19, 2016 3:02 PM  
**To:** K.S.Guliani, Reliance JIO ([Kapoor.Guliani@ril.com](mailto:Kapoor.Guliani@ril.com))  
**Cc:** 'secretary@traf.gov.in'; Balaji, P (COR), Vodafone India  
**Subject:** RE: Interconnection and Augumentation of POIs

Dear Mr. Giuliani

We are in receipt of your letter dated 17 September 2016. This letter of yours does not even refer to our letter dated 16 September 2016 on the same subject. While we have stated that we are ready to discuss the modalities, your said letter mentions otherwise.

We request that Jio should stop sending these mechanical letters and address the issues mentioned in our letters.

Further, we reiterate that we are ready to discuss the modalities for additional POIs at a time convenient to you. As already informed to Mr. Mahipal Singh, we are ready to meet even today evening in our office and are waiting for a revert from your side.

Regards  
Sundeep

**From:** Kathuria, Sundeep (COR), Vodafone India  
**Sent:** Friday, September 16, 2016 3:02 PM  
**To:** K.S.Guliani, Reliance JIO ([Kapoor.Guliani@ril.com](mailto:Kapoor.Guliani@ril.com))  
**Cc:** Balaji, P (COR), Vodafone India  
**Subject:** Interconnection and Augumentation of POIs





RJIL/Vodafone/2016-17/665  
September 19, 2016

To  
Mr. Sundeep Kathuria,  
Executive Vice President- Policy & Regulation,  
Vodafone India Limited,  
7<sup>th</sup> Floor, DLF Centre, Sansad Marg,  
New Delhi-110001

Subject: Augmentation of POIs for Access and NLD Services

Reference: 1. RJIL letter dated 02.09.2016, intimating commencement of service  
2. TRAI meeting dated 09.09.2016 on delay/denial of POI augmentation to RJIL by Airtel, Idea and Vodafone  
3. Daily letters by RJIL, informing about the massive call-failures and exceedingly high POI congestion being faced by RJIL users since 08.07.2016  
4. RJIL firm demand dated 21.06.2016  
5. RJIL letters dated 15.09.2016 & 17.09.2016

Dear Sir,

1. This is in continuation to our regular follow up with you and your concerned circle teams for POI augmentation for over 8 months.
2. As you are aware, TRAI had at the aforementioned meeting held on 09.09.2016, directed us to work together and bring down the POI congestion at each of the POIs to the permissible benchmark of <0.5% in accordance with the Standards of Quality of Service of Basic Telephone Service (wire line) and Cellular Mobile Telephone Service Regulations, 2009 ("QoS Regulations").
3. It is submitted that adequate interconnection is a prerequisite for RJIL and other TSPs to ensure quality of service to their respective subscribers in accordance with prescribed TRAI Regulations/ Directions. This has also been specifically stated by TRAI in its Direction No. 406-10/2005-I&FN (Vol. II) dated 25.10.2011. We further submit that your continued denial of sufficient interconnection is also in violation of Clauses 27.4 and 29.1 of Part-I, Chapter-IV and Clause 6.2 of Part-II, Chapter-VIII of the Unified License.
4. We further submit that RJIL has been doing its best to ensure collaborative solutions to inter-connection related issues with all partners in order to ensure that the interest of the subscribers are safeguarded as first priority. We started by informing all of the interconnected partners of the impending increase in traffic usage of RJIL's subscribers on a regular basis and forecasted the step-wise E1 requirements at each POI.

Reliance Jio Infocomm Limited, CIN: U72900MH2007PLC234712

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Registered Office: 9th Floor, Maker Chambers IV, 222, Nariman Point, Mumbai - 400021, India. Tel: 022-22785000  
www.jio.com

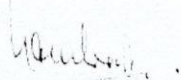


5. We are enclosing a table depicting the traffic and call failure during the busy hour and during all 24 hours for **September 16, 2016**, at each of our POIs as Annexure-A. This table clearly shows the gravity of the situation. We request you to take all steps to ensure compliance with TRAI Regulations on QoS at the earliest.
6. In order to ensure the immediate release of E1s, we reiterate that we are willing to provide requisite Bank Guarantee against the demand notes to be issued for all of our indented POI demand as per letter dated 21.06.2016. It is earnestly requested that you start releasing PCI capacities forthwith per the said RJIL's indented demand and complete at the soonest. As you are aware, for each day delayed, QoS will continue to be in non-compliance with TRAI Regulations. Needless to state, RJIL is willing to extend its cooperation to do all the needful and fulfil its legitimate obligations.
7. We hereby request you to issue immediate instructions to your field units for POI augmentation at the earliest.

Thanking you,

Yours sincerely,

For Reliance Jio Infocomm Limited,

  
Kapoor Singh Guliani  
Authorized Signatory

Enclosures: As above



Vodafone- 16.09.2016												
S. No.	Circle	POI TYPE	Day					BH				
			Outgoing Overall	Failed Call Count	% Failure	Outgoing Erlang	Incoming Erlang	Outgoing Overall	Failed Call Count	% Failure	Outgoing Erlang	Incoming Erlang
1	AP	Local	1963959	1552119	79.03%	10482.7	1438.03	185530	165340	89.12%	637.16	69.92
2	AS	Local	1275652	973931	76.35%	7390.25	992.14	109176	83479	76.46%	363.11	68.97
3	BH	Local	2180905	1636912	75.06%	12197.8	1447.53	119927	77500	64.62%	612.53	90.64
4	CH	Local	277568	158788	57.21%	3433.08	691.22	25134	18656	74.23%	211.61	33.44
5	DL	Local	3101325	2339826	75.45%	10957.4	1623.5	171608	122718	71.51%	583.14	90.08
6	GJ	Local	2870317	1573035	54.80%	13471.7	3237.33	189010	158189	83.69%	804.25	120.08
7	HP	Local	75759	3362	4.44%	2238.61	360.5	6128	1344	21.93%	185.97	23.58
8	HR	Local	2109827	1611090	76.36%	8595.11	1423.92	143834	126295	87.81%	489.39	65.64
9	JK	Local	54473	5067	9.30%	1837.19	250.47	5775	2525	43.72%	134.42	16.11
10	KL	Local	889369	660817	74.30%	4850.22	814.17	106564	82860	77.76%	530.58	83.17
11	KN	Local	1477780	1286978	87.09%	4210.44	904	215136	194602	90.46%	453.47	97.03
12	KOL	Local	1465583	1220923	83.31%	4212.33	1251.56	95877	76978	80.29%	198.06	77.19
13	MH	Local	4261832	3964085	93.01%	3970.84	1363.44	202274	192030	94.94%	227.67	46.5
14	MP	Local	1726320	1244324	72.08%	14116.4	1590.03	92441	60600	65.56%	820.14	121.5
15	MU	Local	2116308	1646419	77.80%	5740.61	312.47	104682	79009	75.48%	353.92	5.81
16	NE	Local	161114	58653	36.40%	3145.03	535	16139	11966	74.14%	191.64	20.44
17	OR	Local	1134787	923211	81.36%	10034.2	1182.47	66841	60786	90.94%	543.47	40.58
18	PS	Local	2254782	2006177	88.97%	11151.7	331.58	62740	57090	90.99%	610.31	4.83
19	RJ	Local	2449428	2283292	93.22%	6408	1597.56	75107	63812	84.96%	337.17	81.25
20	TN	Local	1480141	1278184	86.36%	4681.95	678.55	92202	87500	94.90%	253.89	20.67
21	UPE	Local	798	798	100.00%	0	0	7	7	100.00%	0	0
22	UPW	Local	53744	0	0.00%	2411.94	700.58	1246	0	0.00%	127.47	26.28
23	WB	Local	1667497	1384822	83.05%	7128.47	1659.67	48918	43340	88.60%	390.64	40
24	AP	NLD	111186	77934	70.09%	2082	0	15068	13879	92.11%	122.55	0
25	AS	NLD	143038	120323	84.12%	1729	0	5944	5493	92.41%	90.75	0
26	BH	NLD	810894	779094	96.08%	3217	0	46295	45394	98.05%	152.67	0
27	CH	NLD	37035	18919	51.08%	955	0	5017	4377	87.24%	59.65	0
28	DL	NLD	1455298	1332903	91.59%	10463	0	114759	111932	97.54%	552.91	0
29	GJ	NLD	218842	180626	82.54%	2177	0	28063	26807	95.52%	152.56	0
30	HP	NLD	43757	24425	55.82%	983	0	6042	5467	90.48%	60.71	0
31	HR	NLD	596668	562255	94.23%	2508	0	58236	57367	98.51%	152.69	0
32	JK	NLD	14789	8241	55.72%	458	0	2976	2693	90.49%	29.81	0
33	KL	NLD	65781	44490	67.63%	1031	0	5046	4513	89.44%	59.67	0
34	KN	NLD	241058	210848	87.47%	2255	0	21924	21122	96.34%	121.7	0
35	KOL	NLD	228590	199068	87.09%	2307	0	27211	26244	96.45%	121.66	0
36	MH	NLD	161183	110396	68.49%	3021	0	21214	19413	91.51%	214.33	0
37	MP	NLD	100964	62986	62.38%	2556	0	14707	13182	89.63%	182.39	0
38	MU	NLD	53471	0	0.00%	3050	0	2012	0	0.00%	214.32	0
39	NE	NLD	63890	41473	64.91%	1112	0	9003	8368	92.95%	59.72	0
40	OR	NLD	157357	128315	81.54%	2303	0	13434	12565	93.53%	122.65	0
41	PB	NLD	356856	311093	87.18%	3375	0	23254	22076	94.93%	183.55	0
42	RJ	NLD	776327	720380	92.79%	5284	0	101034	99475	98.46%	277.44	0
43	TN	NLD	137654	123811	89.94%	962	0	15248	14747	96.71%	49.82	0
44	UPE	NLD	1380271	1341565	97.20%	5925	0	34838	33917	97.36%	276.6	0
45	UPW	NLD	678413	616383	90.86%	5726	0	81691	79892	97.80%	307.37	0
46	WB	NLD	524420	466516	88.96%	3541	0	64530	61962	96.02%	176.29	0





WITHOUT PREJUDICE

RJIL/Vodafone/2016-17/654

19 September 2016

Mr. Sundeep Kathuria,  
Executive Vice President- Policy & Regulation,  
Vodafone India Limited and Vodafone Mobile Services Limited,  
7<sup>th</sup> Floor, DLF Centre,  
Sansad Marg, New Delhi - 110001

**Subject: Interconnection Agreement between Vodafone India Limited and Reliance Jio Infocomm Limited dated 14 April 2014**

**Reference:** 1. VIL letter no. VIL/LT/16-17/358 dated 09.09.2016  
(the "September 9 Letter");  
2. VIL letter no. VIL/LT/16-17/370 dated 12.09. 2016  
(the "September 12 Letter");  
3. VIL letter no. VIL/LT/16-17/379 dated 16.09.2016  
(the "September 16 Letter")

Dear Sir,

1. We are in receipt of the captioned letters.
2. At the outset, and as already informed from time to time, we reiterate that RJIL does not provide Internet Telephony services at present and no Internet Telephony calls are being handed over to the TSPs at their POIs. To elaborate:
  - (i) Internet Telephony services must necessarily involve transmission of the relevant voice service using public internet, which admittedly is not the case for any of RJIL's services, and therefore the services, as provided now are not Internet Telephony services.
  - (ii) The use of 2G/3G phones to make calls over RJIL 4G network is clarified as follows:
    - a) This is altogether a different product using MiFi router.
    - b) MiFi router is a portable router that connects with RJIL LTE network on one side and creates a personalized Wi-Fi network on the other side. The

Page 1 of 8



voice service is provided only after SIM authentication. It is also enabled with lawful interception.

- c) Customer is provided with a RJIL SIM with RJIL MSISDN for the MiFi router. Customer inserts the RJIL SIM into the MiFi router. The 2G/3G smartphones can then connect to the RJIL MiFi router using SSID/password of the MiFi router and thereby get access to RJIL LTE network.
- d) Customer installs the Jio4GVoice application (an IMS application which was earlier branded as 'Jio Join') on the 2G/3G smartphone via Android Play store, Apple store etc. By activating Jio4GVoice application on the 2G/3G smartphone, any one device is able to access SIM credentials of the RJIL MiFi router. The activation of Jio4GVoice application is performed after duly authenticating the RJIL subscriber via Jio user id/ password, OTP etc. Post successful activation process, the Jio4GVoice application on this one device will be able to read the credentials from the associated RJIL SIM in the MiFi router to authenticate with RJIL IMS core.
- e) Jio4GVoice application together with associated RJIL SIM credentials needs to be authenticated every time by IMS core before being able to make outgoing and receive incoming voice calls on RJIL MSISDN via LTE network. This is to ensure that RJIL SIM in the MiFi router is physically collocated with the 2G/3G smartphone accessing the voice calls.
- f) The MSISDN associated with RJIL SIM in the MiFi router is used for outgoing/ incoming calls/ messaging. The CLI would be that of the LTE MiFi device regardless of the 2G/3G smartphone being used to complete the call. For making such voice calls, the public internet is not used and therefore this does not constitute Internet Telephony. On the contrary, public internet is required to be used for voice services in the case of Internet Telephony.
- g) Thus, RJIL subscribers having subscribed to a RJIL service, using a RJIL SIM on the MiFi device alone are enabled to avail voice services using 2G/3G smartphones. Even in the situation when a LTE SIM is placed in the 2G/3G smartphone, the subscriber is able to make and receive voice calls using Jio4GVoice application only through connectivity of the MiFi router and not through public internet. These services are nothing but LTE VVM services.



- h) The voice services using MiFi router as described above has been approved by DOT and the same has also been demonstrated to Security Agencies for Lawful Interception capabilities.
- (iii) Therefore it is amply clear that the above service offered by RJIL is not Internet Telephony, and furthermore, no Internet Telephony calls are being handed over at the POIs of TSPs, as is being wrongly contended by Vodafone, in spite of having the knowledge of all of the above said facts.
3. If Vodafone's concerns are that the terms for providing interconnection capacities for Internet Telephony services are not included in the Interconnection Agreement dated 14.04.2014 ("**Interconnection Agreement**"), the same is not relevant for discussions at this point of time, without prejudice to RJIL's rights to provide Internet Telephony services and terminate such calls on other service providers' network. Vodafone ought not to raise any issue, when none exists in the first place and shall fulfill its solemn obligations to provide interconnect capacities on time, and without demur and any further delay.
4. While RJIL welcomes Vodafone's recent public statement confirming the resumption of releasing of POI capacities to RJIL following TRAI's instructions, RJIL reiterates that the quantity of POI capacities proposed to be released by Vodafone is grossly inadequate and would still have to be augmented per RJIL's firm demand dated 21.06.2016.
5. Please be informed that your September 9 Letter is completely baseless, factually incorrect and devoid of merit for the following reasons:
- (i) As regards the various statements stated in paragraph 2 of your September 9 Letter, Vodafone wilfully and erroneously alludes that the Interconnection Agreement, the Telecommunications Interconnection Usage Charges Regulations 2003 (2 of 2005) ("**IUC Regulations**") and the intent agreed between the parties did not envisage Internet Telephony services. Vodafone's allusions are misplaced *ab initio*. To substantiate:
- a) First and foremost, Internet Telephony is a type of voice service capable of being provided using public internet per applicable terms of License and TRAI's Guidelines/ Regulations. Clause 2.1 of the Interconnection Agreement sets out the scope of the Interconnection Agreement which provides that an operator is required to provide interconnection for exchange of "telecom traffic". Clause 5.20 provides that interconnectivity between Parties will be utilized for "voice calls" and SMS originating from and terminating in their respective networks only.



Clause 7.8 mentions that signalling links between Vodafone and RJIL's networks are to be exclusively used to facilitate setting up of "voice calls", intra circle roaming and SMS directly flowing between RJIL's Network and Vodafone's Network. Voice Call services is expressly specified in Schedule 2 to the Interconnection Agreement. Voice calls are not distinguished based on type of technology/ network anywhere in the Interconnection Agreement. Hence, Internet Telephony is already and in any event, shall be deemed included in the Interconnection Agreement.

- b) Furthermore, RJIL submits that Internet Telephony services for Unified Licensees specifically are also included within the scope of "Voice Call Service" as envisaged in Schedule 2 – Part II of the IUC Regulations. IUC Regulations, as amended in 2015 fixed the termination charges for 'wireless to wireless', 'wireless to wireline', 'wireline to wireline' and 'wireline to wireless' for both local and national long distance call. The IUC Regulations therefore also does not distinguish the traffic based on technology/ network used. RJIL therefore reiterates that Internet Telephony is also duly covered by the IUC Regulations and the charges fixed therein would also apply for Internet Telephony, duly landed on other service providers' network in accordance with applicable License terms.
- c) The intent of the parties can be derived from the terms and conditions of the Interconnection Agreement alone. In any event, the facts that the expression "Internet Telephony" not being mentioned in RJIL's mail of 14.01.2014 is irrelevant and at best inadvertence. So long as the Interconnection Agreement covers all of the services envisaged for the provision of POIs, the discussions that ensued ahead of signing the Interconnection Agreement is also irrelevant. Vodafone conveniently ignores that the scope of CMTS includes Internet Telephony services per terms of both UASL and Unified License as well, and it is for these licensed services for which Interconnection Agreement was executed. This further evidences the true intent of the parties as regards the scope of services. Vodafone ought to also be aware that the IUC Regulations, as amended from time to time, fixes IUC charges towards terminating voice calls using all of the relevant licensed services and there's no exception or exclusions made for Internet Telephony services.
- d) Without prejudice to the above, in any event of disagreement such as this, the Interconnection Agreement provides for determination by TRAI/ DoT. Clause 20.2 of the Interconnection Agreement also makes it abundantly clear that pending determination of issues, parties are



required to ensure continuity of services. Hence, Vodafone cannot threaten suspension or discontinuation of interconnection services and any action or intent to do otherwise is a material breach of the License terms and applicable TRAI's Regulations and are ultra vires the terms of Interconnection Agreement and only demonstrative of malice.

- e) RJIL would like to bring to your notice that it has received due and necessary approvals from DOT to provide Internet Telephony services after conducting requisite tests, including demonstration of LIM functionality for the provision of the services.
  - f) Be that as may be, please be informed and rest assured that, as and when RJIL decides to introduce Internet Telephony services, it will be absolutely in compliance with all applicable terms of RJIL's Unified License and extant TRAI Regulations and Guidelines.
- (ii) As regards paragraph 3 of your September 9 Letter, RJIL reiterates what is stated above and no further response is warranted.
- (iii) As regards paragraph 4 of your September 9 Letter, RJIL reiterates what is stated above and its previous letters/ communications. RJIL reemphasises that RJIL is within its rights to seek handover of Internet Telephony traffic on Vodafone's POIs. RJIL expressly reserves its rights to defend any or all of Vodafone's erroneous claims as regards the scope of the Interconnection Agreement. Vodafone's conclusions are therefore presumptive and not sustainable in facts and/ or on law and any unwarranted actions, being/ continued to be perpetrated by Vodafone will be in violation of its License terms and applicable TRAI Regulations for quality of services, which are imminently against public interest. In any event, the said issue is irrelevant inasmuch as RJIL is not providing Internet Telephony services at this juncture.
- (iv) As regards paragraph 5 of your September 9 Letter, RJIL has no comments and reserves its rights to partake in any or all of TRAI's consultation process, in any manner, deemed fit and necessary.
- (v) As regards paragraph 6 of your September 9 Letter, RJIL reiterates what is stated above. Once a service has been licensed to be provided, the same can be considered to be provided per extant regulations applicable therefor. Your reference to numbering series for Internet Telephony services is premature and irrelevant. The use of RJIL SIM for its various services have also been adequately explained and there's no need for any further



discussions. Your further innuendos on TRAI's processes and DOT approval of RJIL's Internet Telephony services are unwarranted and not in right spirit.

- (vi) As regards paragraph 7 and 8 of your September 9 Letter, RJIL reiterates that at present, it does not provide Internet Telephony services. RJIL in any event cannot be required to provide call data records by Vodafone as a matter of right. It is further reiterated that the reference to RJIL's Jio Join service on its website relates to use by a Jio4GVoice application to use LTE 'data only' phones and MiFi devices to make voice calls. This is not Internet Telephony for reasons more fully explained above. This was also explained to the satisfaction of Vodafone's representatives on 13.09.2016, i.e. post the issue of your September 9 Letter. Consequently, there are no irregularities, whatsoever in the manner of transmission of RJIL's voice calls and therefore your proposal to charge an IUC at the highest rate of Rs. 0.53 per minute per Clause 8.3 does not arise. Further, your claims for material breach will also not survive. We believe Vodafone will now acknowledge that there is absolutely no cause of action for suspension/ termination, as envisaged in Clause 20.1 (a) and 21.2 (a) (iii) of the Interconnection Agreement. We therefore would like to treat this matter as closed.
  - (vii) Paragraph 9 and 10 of your September 9 Letter do not warrant any response.
  - (viii) For the foregoing reasons, Vodafone's purported notice for material breach of Interconnection Agreement under the September 9 Letter no longer holds good and is deemed to have been withdrawn.
6. As regards the need for confirmations mentioned in your September 12 Letter, RJIL states:
- (i) In respect of No.1 of your September 12 Letter, as already confirmed earlier in RJIL's letter of 02.09.2016 to you, RJIL has commenced services with effect from 05.09.2016 in accordance with applicable License terms, and also duly informed the DoT vide its letter dated 01.09.2016.
  - (ii) In respect of No.2 of your September 12 Letter, please be informed that no such confirmation is warranted, inasmuch as, the use of any smartphones (including 2G/3G) to make voice calls using a RJIL SIM is duly approved by DOT and the same has also been demonstrated to Security Agencies for Lawful Interception capabilities and it is not akin to Internet Telephony, as explained above.



7. Our submissions in the September 16 Letter are also bereft of any merit. To reiterate:

- (i) RJIL puts Vodafone on notice that the obligation to provide interconnection capacities are not contingent on any other requirement. Vodafone ought to provide requisite interconnection capacities to meet the bare minimum QoS requirements mandated by TRAI's regulations. You are also aware that TRAI has specifically advised all of the service providers to maintain the requisite interconnection capacities to comply with the QoS requirements and ensure that customers don't suffer at any cost. TRAI has in fact warned that all of the service providers shall provide the requisite interconnection capacities to maintain QoS requirements and this cannot be subject to any further contingencies or restrictions. Therefore, please be warned that Vodafone is already in material breach of the applicable License Terms and TRAI's Regulations. Please be further warned that Vodafone's ongoing delay in releasing the requisite POI capacities tantamount to continuing material breach of the applicable License Terms, Interconnection Agreement and TRAI's Regulations, warranting punitive consequences for financial penalties for every instance of violation, including actions for termination of its License/s. RJIL expressly reserves its rights to pursue any or all legal recourse against Vodafone for its various illegal acts and omissions.
- (ii) Paragraph 1 of your September 16 Letter does not warrant any response.
- (iii) As regards paragraph 2 of your September 16 Letter, your concerns regarding need for RJIL's confirmations and Internet Telephony are adequately addressed above. RJIL objects to Vodafone's interference in RJIL's solemn rights to determine the tariff plan for its services. You are also of course aware that the tariff for services are left to be determined on principles of forbearance and therefore none can interfere. In any event, your allusions on RJIL's tariff plans for its services are unwarranted. Please be informed that RJIL's tariff plans including any special benefits therein are in accordance with the Telecom Tariff Orders, 1999 (as amended) and that we have met all reporting requirements required thereunder.
- (iv) As regards paragraph 3 of your September 16 Letter, RJIL reiterates what is stated above. Vodafone shall and must go all the way in providing the requisite interconnection capacities to RJIL in accordance with its firm demand made on 21.06.2016. Your claim of there being no level playing field is ironical, considering it is an incumbent dominant operator like yourself, which in collusion with other incumbent dominant operators, is in fact denying a level playing field to a new operator like RJIL.



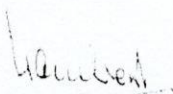
- (v) As regards paragraph 4 of your September 16 Letter, please be warned that Vodafone's obligation to augment interconnection capacities is a continuing and ongoing obligation. RJIL reiterates that Vodafone's obligation to provide interconnection is not contingent or dependent on any other matter or any other action (whether reciprocal or otherwise) from any party and such contentions are not germane to the issue at hand. Vodafone's deliberate attempt to raise irrelevant issues and purporting it to be reasons/ conditions for releasing interconnection capacities are *ex facie* illegal for reasons stated above.
- (vi) As suggested by you, we are happy to meet and coordinate the immediate release of additional interconnection capacities.

Trust, the above explains.

Thanking you,

Yours sincerely,

For Reliance Jio Infocomm Limited,

  
Kapoor Singh Guliani  
Authorised Signatory

**Copy for Information to:**

1. Secretary (T), Department of Telecommunications, Ministry of Communications, Sanchar Bhawan, 20, Ashoka Road, New, Delhi- 110001
2. Chairman, Telecom Regulatory Authority of India, Mahanagar Doorsanchar Bhawan, J.L. Nehru Marg, Old Minto Road, New Delhi – 110002



## Annexure II

In case a 4G SIM of Jio is inserted in a 2G/3G only compatible smartphone and a call is made to corresponding MSISDN number then the call should not establish. The call is not getting established in such cases where only two devices (i.e. calling handset and called handset) are used.

1. However, in case there is a third device i.e. JioFi (with a 4G Jio SIM – say MSISDN JioFi) and which on WIFI is connected to the 2G/3G only compatible smartphone [having a Jio Join App (now named as Jio4G Voice) with another 4G Jio SIM(say MSISDN Handset)] then if the calling party is dialing the MSISDN No. of the SIM in the smartphone (MSISDN Handset) then the call is set up.
2. In some stances, we have found that the call answer functionality is displayed but is disabled by the App and the call gets terminated as missed call. We are attaching a video of our experience with such call set up. We have found that a call with same setup can be originated from 4G SIM in 2G/3G only compatible handset.
3. In some other instances, the call gets initiated for a few seconds, for which, the CDRs are given below:

A PARTY NUMBER	B PARTY NUMBER	CALL_DATE	CALL_TIME	DURATION	CELL_ID
7011540477	9811918500	08-SEP-2016	11:55:16	5	404111110658676
9811918500	7011540477	08-SEP-2016	11:57:48	7	404111110658676
7011540477	9811918500	08-SEP-2016	12:24:39	2	404111110658676
7011540477	9811918500	19-SEP-2016	12:07:29	2	404111110658676

Please note:

- The MSISDN Number of the Jio SIM in the handset is 7011540477.
  - The MSISDN of the SIM in the JioFi device is 7011751282 and the IMEI number of the device is 911 522 600 234125. This number does not reflect at all in the CDRs.
4. Such routing cannot be established, except through the SIM and MSISDN, which is in the JioFi Device i.e. MSISDN JioFi. Such routing is not permissible under the license and is certainly outside the scope of interconnection agreement. Further, the call is wrongly routed and network termination is on the MSISDN number corresponding to SIM in Jio Fi device (MSISDN JioFi) which number was never dialed but wrong routing and impermissible use of subscriber WIFI for network call are enabling the call to use WIFI created by JioFi device. Such WIFI is not access network of Jio for the call and there is modification of CLI.
  5. We have asked Jio to share CDRs for past period so that we can further analyze, which they have denied.



**From:** Katturia, Sundeep (COR), Vodafone India  
**Sent:** Tuesday, September 20, 2016 3:47 PM  
**To:** K.S.Guliani, Reliance JIO ([Kapoor.Guliani@ril.com](mailto:Kapoor.Guliani@ril.com)); Mahipal Singh@ril.com  
**Cc:** Balaji, P (COR), Vodafone India  
**Subject:** Meeting today  
**Importance:** High

Dear Mr. Giuliani

This refers to our meeting today on POI issue. After due assessment, we have agreed for increase of further 844 E1s from the present number of 486 E1s, with cumulative number of POIs being 1330 E1s. In regard to the Local E1s, the traffic today is two way on existing E1s which is to be bifurcated into outgoing and ingoing E1s. The overall break up of E1s for Local/NLD was discussed in the meeting is given below and the exact circle wise with Local incoming/outgoing E1s break up is also given thereafter:

Overall:

	Local E1			RJIO NLDE1			Total E1s		
	Existing E1's (as on 6th Sep)	Additional E1s	Total E1s	Existing E1's	Additional E1s	Total E1s	Existing E1's (as on 6th Sep)	Additional E1s	Total E1s
Total	362	725	1087	124	119	243	486	844	1330

Break up:

Circle	Local E1 requirement			Total Local E1s (After augmentation)		RJIO NLDE1			Total E1s		
	Existing E1's (as on 6th Sep)	Additional E1s	Total E1s	Incoming E1s	Outgoing E1s	Existing E1's	Additional E1s	Total E1s	Existing E1's (as on 6th Sep)	Additional E1s	Total E1s
AP	23	34	57	31	26	4	5	9	27	39	66
ASM	14	21	35	19	16	3	2	5	17	23	40
BIH	23	41	64	35	29	5	5	10	28	46	74
CHN	8	14	22	12	10	2	3	5	10	17	27



DEL	22	53	75	41	34	5	12	17	27	65	92
GUJ	30	72	102	56	46	5	10	15	35	82	117
HAR	18	44	62	34	28	2	8	10	20	52	72
HP	7	8	15	8	7	1	1	2	8	9	17
JK	5	6	11	6	5	4	3	7	9	9	18
KAR	9	24	33	18	15	2	3	5	11	27	38
KER	10	25	35	19	16	7	3	10	17	28	45
KOL	13	25	38	21	17	6	4	10	19	29	48
MP	33	40	73	40	33	2	8	10	35	48	83
MAH	11	29	40	22	18	4	14	18	15	43	58
MUM	16	41	57	31	26	9	6	15	25	47	72
NE	7	9	16	9	7	6	1	7	13	10	23
ODI	19	27	46	25	21	3	4	7	22	31	53
PJB	20	39	59	32	27	9	6	15	29	45	74
RAJ	14	41	55	30	25	10	4	14	24	45	69
ROTN	9	24	33	18	15	18	5	23	27	29	56
UPE	22	33	55	30	25	4	4	8	26	37	63
UPW	11	35	46	25	21	7	5	12	18	40	58
ROB	18	41	59	32	27	6	3	9	24	44	68
Total	362	725	1087	594	493	124	119	243	486	844	1330

In addition we will increase our NLD POIs by 27 Numbers (circle wise break up will be given separately).

We request you to approach our circles regarding such augmentation POIs and they are being instructed to do the needful at the earliest. We request co-operation and support from your side on this augmentation.

Please note such augmentation is without prejudice to our contentions made in our previous correspondence and such augmentation should not be deemed to be waiver of any sort. We have received your letter of 19 September 2016 and at the outset submit that we do not agree to its contents and will suitably reply to it in few days.

Regards  
Sundeep Kathuria



**From:** Kathuria, Sundeep (COR), Vodafone India  
**Sent:** Wednesday, September 21, 2016 3:29 PM  
**To:** 'K.S.Guliani, Reliance JIO (Kapoor.Guliani@ril.com)'; 'Mahipal.Singh@ril.com'  
**Cc:** Balaji, P (COR), Vodafone India  
**Subject:** RE: Meeting today

Dear Mr. Giuliani

Kindly take note that there is some mismatch due to a cut & paste error in the circle wise break up of RJIO NLDE1 given in trailing mail. We are providing the correct break up of RJIO NLD E1s hereunder along with details of Voda NLD E1s as mentioned in the trailing mail.

Circle	RJIO NLDE1			VF NLDE1		
	Existing E1's	Additional E1s	Total E1s	Existing E1's	Additional E1s	Total E1s
AP	4	5	9	2	4	6
ASM	3	2	5	1		1
BIH	5	5	10	3	3	6
CHN	2	3	5	1	2	3
DEL	18	12	30	3	3	6
GUJ	5	10	15			
HAR	5	8	13			
HP	2	1	3			
JK	1	3	4			
KAR	4	3	7	1	2	3
KER	2	3	5	1		1
KOL	4	4	8	2		2
MP	6	8	14	2	2	4
MAH	7	14	21	1	4	5
MUM	7	6	13	3		3
NE	2	1	3	1		1
ODI	4	4	8	1	2	3
PJB	6	6	12			
RAJ	9	4	13	2	3	5
ROTN	3	5	8			
UPE	9	4	13			
UPW	10	5	15	3	2	5
ROB	6	3	9			
Total	124	119	243	27	27	54

We request you to consider above figures for NLD POIs

Regards

Sundeep Kathuria



**From:** Kathuria, Sundeep (COR), Vodafone India  
**Sent:** Wednesday, September 21, 2016 3:29 PM  
**To:** 'K.S.Guliani, Reliance JIO (Kapoor.Guliani@ril.com)'; 'Mahipal.Singh@ril.com'  
**Cc:** Balaji, P (COR), Vodafone India  
**Subject:** RE: Meeting today

Dear Mr. Giuliani

Kindly take note that there is some mismatch due to a cut & paste error in the circle wise break up of RJIO NLDE1 given in trailing mail. We are providing the correct break up of RJIO NLD E1s hereunder along with details of Voda NLD E1s as mentioned in the trailing mail.

Circle	RJIO NLD E1			VF NLD E1		
	Existing E1's	Additional E1s	Total E1s	Existing E1's	Additional E1s	Total E1s
AP	4	5	9	2	4	6
ASM	3	2	5	1		1
BIH	5	5	10	3	3	6
CHN	2	3	5	1	2	3
DEL	18	12	30	3	3	6
GUJ	5	10	15			
HAR	5	8	13			
HP	2	1	3			
JK	1	3	4			
KAR	4	3	7	1	2	3
KER	2	3	5	1		1
KOL	4	4	8	2		2
MP	6	8	14	2	2	4
MAH	7	14	21	1	4	5
MUM	7	6	13	3		3
NE	2	1	3	1		1
ODI	4	4	8	1	2	3
PJB	6	6	12			
RAJ	9	4	13	2	3	5
ROTN	3	5	8			
UPE	9	4	13			
UPW	10	5	15	3	2	5
RCB	6	3	9			
Total	124	119	243	27	27	54

We request you to consider above figures for NLD POIs  
 Regards  
 Sundeep Kathuria



Information on traffic on points of interconnection (POIs) with M/s Reliance Jio Infocomm Ltd. (RJIL) during busy hour for each day from 15.09.2016 to 19.09.2016 separately

Name of Telecom Service Provider:					Vodafone India Ltd			
Date: 15.09.2016								
S.No.	Licensed Service Area	No. Of E1s at POI	Percent utilization of E1s during busy hour	Originating Traffic in Erlangs during busy hour (i.e. Traffic terminated in the network of RJIL)	Terminating Traffic in Erlangs during busy hour (i.e. Traffic originated in the network)	No. of outgoing call attempts during busy hour	No. of failed call attempts during busy hour	% Failed call attempts during busy hour
1	AP	23	106	92	615	32766	12309	38
2	ASM	14	101	60	342	31635	12941	41
3	BIH	23	102	104	580	39585	15638	40
4	CHN	8	110	45	195	10659	3953	37
5	DEL	22	105	91	583	28029	20936	75
6	GUJ	30	100	185	700	26178	12862	49
7	HAR	18	103	87	446	10469	8063	77
8	HP	7	111	27	182	1788	201	11
9	JK	5	113	20	127	17280	NA	NA
10	KAR	9	109	57	212	25880	14266	55
11	KER	10	107	55	244	46748	6683	14
12	KOL	13	108	80	316	26579	12662	48
13	MAH	11	107	89	239	38765	32904	85
14	MP	33	99	103	863	33991	16088	47
15	MUM	16	104	25	438	19356	18183	94
16	NE	7	99	30	155	33045	3310	10
17	ODI	19	106	71	508	31066	11841	38
18	PJB	20	107	9	606	24554	11493	47
19	RAJ	14	102	96	312	36318	13177	36
20	ROB	18	100	106	411	29735	21254	71
21	ROTN	9	109	39	230	19225	16388	85
22	UPE	22	102	153	493	24554	12527	51
23	UPW	11	106	51	272	23141	20172	87

B. Information w.r.t. POIs with RJIL as NLDO

S.No.	Licensed Service Area	No. Of E1s at POI	Percent utilization of E1s during busy hour	Terminating Traffic in Erlangs during busy hour (i.e. Traffic originated in the network of RJIL)
1	AP	4	124	127
2	ASM	3	130	95
3	BIH	5	114	150
4	CHN	2	123	56
5	DEL	18	107	553
6	GUJ	5	117	152
7	HAR	5	117	153
8	HP	2	131	60
9	JK	1	152	29
10	KAR	4	119	121
11	KER	2	128	59
12	KOL	4	119	122
13	MAH	7	113	214
14	MP	6	109	172
15	MUM	7	113	214
16	NE	2	127	57
17	ODI	4	119	122
18	PJB	6	115	184
19	RAJ	9	103	257
20	ROB	6	112	180
21	ROTN	2	148	53
22	UPE	9	102	253
23	UPW	10	106	295



Information on traffic on points of interconnection (POIs) with M/s Reliance Jio Infocomm Ltd. (RJIL) during busy hour for each day from 15.09.2016 to 19.09.2016 separately

Name of Telecom Service Provider:	Vodafone India Ltd
Date:16.09.2016	

S.No.	Licensed Service Area	No. Of EIs at POI	Percent utilization of EIs during busy hour	Originating Traffic in Erlangs during busy hour (i.e. Traffic terminated in the network of RJIL)	Terminating Traffic in Erlangs during busy hour (i.e. Traffic originated in the network of RJIL)	No. of outgoing call attempts during busy hour	No. of failed call attempts during busy hour	% Failed call attempts during busy hour
1	AP	23	103	90	598	21579	12897	60
2	ASM	14	107	82	364	17345	11262	65
3	BIH	23	102	98	585	22761	13624	60
4	CHN	8	111	40	202	5452	3107	57
5	DEL	22	106	91	583	49218	19515	40
6	GUJ	30	100	196	690	29424	14468	49
7	HAR	18	107	82	475	13228	7760	59
8	HP	7	107	25	178	2784	499	18
9	JK	5	109	15	127	1608	NA	NA
10	KAR	9	105	40	220	17026	14485	85
11	KER	10	107	53	245	12140	7296	60
12	KOL	13	109	81	315	17219	11409	66
13	MAH	11	108	94	238	43324	36074	83
14	MP	33	98	94	860	26682	16243	61
15	MUM	16	102	9	446	174102	22242	13
16	NE	7	107	30	169	5764	3233	56
17	ODI	19	101	73	481	18462	11888	64
18	PJB	20	106	9	606	21273	12562	59
19	RAJ	14	107	92	334	18768	13138	70
20	ROB	18	106	110	436	30570	21545	70
21	ROTN	9	109	33	236	17887	15417	86
22	UPE	22	103	153	504	24513	12337	50
23	UPW	11	108	50	281	23110	20089	87

B. Information w.r.t. POIs with RJIL as NLDO

S.No.	Licensed Service Area	No. Of EIs at POI	Percent utilization of EIs during busy hour	Terminating Traffic in Erlangs during busy hour (i.e. Traffic originated in the network of RJIL)
1	AP	4	122	125
2	ASM	3	129	93
3	BIH	5	110	145
4	CHN	2	117	53
5	DEL	18	107	552
6	GUJ	5	117	153
7	HAR	5	115	149
8	HP	2	133	61
9	JK	1	146	28
10	KAR	4	122	124
11	KER	2	125	57
12	KOL	4	119	122
13	MAH	7	111	210
14	MP	6	110	174
15	MUM	7	113	214
16	NE	2	113	51
17	ODI	4	111	113
18	PJB	6	115	183
19	RAJ	9	109	271
20	ROB	6	113	181
21	ROTN	2	133	48
22	UPE	9	109	271
23	UPW	10	108	301



Information on traffic on points of interconnection (POIs) with M/s Reliance Jio Infocomm Ltd.  
(RJIL) during busy hour for each day from 15.09.2016 to 19.09.2016 separately

Name of Telecom Service Provider:	Vodafone India Ltd
Date:17.09.2016	

S.No.	Licensed Service Area	No. Of E1s at POI	Percent utilization of E1s during busy hour	Originating Traffic in Erlangs during busy hour (i.e. Traffic terminated in the network of RJIL)	Terminating Traffic in Erlangs during busy hour (i.e. Traffic originated in the network of RJIL)	No. of outgoing call attempts during busy hour	No. of failed call attempts during busy hour	% Failed call attempts during busy hour
1	AP	23	101	92	584	21800	13210	61
2	ASM	14	103	53	356	17508	11854	68
3	BIH	23	104	87	611	22283	13995	63
4	CHN	8	111	46	196	6203	3568	58
5	DEL	22	105	91	582	43892	17209	39
6	GUJ	30	103	203	709	28639	11593	40
7	HAR	18	102	66	462	13129	7748	59
8	HP	7	109	22	184	2935	778	27
9	JK	5	108	15	125	1476	NA	NA
10	KAR	9	98	45	198	16585	14048	85
11	KER	10	105	52	241	12748	7853	62
12	KOL	13	108	69	327	16199	10432	64
13	MAH	11	106	98	233	44339	37132	84
14	MP	33	98	95	858	24539	14946	61
15	MUM	16	104	9	456	42705	22696	53
16	NE	7	108	31	170	5039	2236	44
17	ODI	19	102	70	491	19816	13333	67
18	PJB	20	106	6	609	20678	12087	58
19	RAJ	14	104	84	329	18661	13134	70
20	ROB	18	103	96	438	29415	20683	70
21	ROTN	9	110	40	231	17613	14878	84
22	UPE	22	102	150	502	24451	12736	52
23	UPW	11	105	44	275	24545	21754	89

B. Information w.r.t. POIs with RJIL as NLDO

S.No.	Licensed Service Area	No. Of E1s at POI	Percent utilization of E1s during busy hour	Terminating Traffic in Erlangs during busy hour (i.e. Traffic originated in the network of RJIL)
1	AP	4	124	127
2	ASM	3	122	88
3	BIH	5	117	153
4	CHN	2	125	57
5	DEL	18	107	552
6	GUJ	5	114	148
7	HAR	5	116	151
8	HP	2	126	57
9	JK	1	150	29
10	KAR	4	114	116
11	KER	2	129	59
12	KOL	4	119	122
13	MAH	7	108	204
14	MP	6	109	173
15	MUM	7	113	214
16	NE	2	136	61
17	ODI	4	111	113
18	PJB	6	115	183
19	RAJ	9	106	263
20	ROB	6	107	171
21	ROTN	2	131	47
22	UPE	9	105	261
23	UPW	10	105	293



Information on traffic on points of interconnection (POIs) with M/s Reliance Jio Infocomm Ltd. (RJIL) during busy hour for each day from 15.09.2016 to 19.09.2016 separately

Name of Telecom Service Provider:	Vodafone India Ltd
Date: 18.09.2016	

S.No.	Licensed Service Area	No. Of E1s at POI	Percent utilization of E1s during busy hour	Originating Traffic in Erlangs during busy hour (i.e. Traffic terminated in the network of RJIL)	Terminating Traffic in Erlangs during busy hour (i.e. Traffic originated in the network of RJIL)	No. of outgoing call attempts during busy hour	No. of failed call attempts during busy hour	% Failed call attempts during busy hour
1	AP	23	103	83	605	20497	12508	61
2	ASM	14	100	48	350	16847	11841	70
3	BIH	23	102	83	598	22132	14112	64
4	CHN	8	108	37	199	5394	3239	60
5	DEL	22	105	91	582	42462	16152	38
6	GUJ	30	103	181	729	26680	11416	43
7	HAR	18	102	57	470	11890	7493	63
8	HP	7	112	23	190	3405	1080	32
9	JK	5	114	14	134	1346	NA	NA
10	KAR	9	109	42	229	15617	12880	82
11	KER	10	104	46	244	12553	8230	66
12	KOL	13	109	70	326	15598	10248	66
13	MAH	11	108	83	246	41457	35098	85
14	MP	33	101	83	895	24932	15926	64
15	MUM	16	108	8	472	35438	18903	53
16	NE	7	113	20	191	4845	2878	59
17	ODI	19	102	65	495	18926	12472	66
18	PJB	20	107	8	607	19553	11454	59
19	RAJ	14	103	73	338	17019	11828	69
20	ROB	18	105	90	454	28674	21672	76
21	ROTN	9	112	31	246	16462	14119	86
22	UPE	22	103	140	516	24108	13272	55
23	UPW	11	105	38	284	21963	19233	88

B. Information w.r.t. POIs with RJIL as NLDO

S.No.	Licensed Service Area	No. Of E1s at POI	Percent utilization of E1s during busy hour	Terminating Traffic in Erlangs during busy hour (i.e. Traffic originated in the network of RJIL)
1	AP	4	119	122
2	ASM	3	123	90
3	BIH	5	109	143
4	CHN	2	121	55
5	DEL	18	107	553
6	GUJ	5	116	152
7	HAR	5	110	143
8	HP	2	129	59
9	JK	1	134	26
10	KAR	4	116	118
11	KER	2	104	47
12	KOL	4	119	122
13	MAH	7	107	203
14	MP	6	113	179
15	MUM	7	113	214
16	NE	2	132	59
17	ODI	4	117	120
18	PJB	6	115	184
19	RAJ	9	110	274
20	ROB	6	109	175
21	ROTN	2	141	51
22	UPE	9	108	268
23	UPW	10	116	323



Information on traffic on points of interconnection (POIs) with M/s Reliance Jio Infocomm Ltd. (RJIL) during busy hour for each day from 15.09.2016 to 19.09.2016 separately

Name of Telecom Service Provider:	Vodafone India Ltd
Date:19.09.2016	

S.No.	Licensed Service Area	No. Of E1s at POI	Percent utilization of E1s during busy hour	Originating Traffic in Erlangs during busy hour (i.e. Traffic terminated in the network of RJIL)	Terminating Traffic in Erlangs during busy hour (i.e. Traffic originated in the network of RJIL)	No. of outgoing call attempts during busy hour	No. of failed call attempts during busy hour	% Failed call attempts during busy hour
1	AP	23	104	93	601	22062	13778	62
2	ASM	14	104	62	352	18613	13270	71
3	BIH	23	105	102	598	23322	14229	61
4	CHN	8	112	40	205	6691	4222	63
5	DEL	22	105	91	582	22788	21806	41
6	GUJ	30	103	237	672	31520	14527	46
7	HAR	18	104	73	465	13407	8390	63
8	HP	7	113	23	190	3556	1206	34
9	JK	5	110	11	132	977	NA	NA
10	KAR	9	109	49	222	7091	14525	85
11	KER	10	105	48	245	3848	3322	67
12	KOL	13	108	75	321	7856	2655	71
13	MAH	11	107	90	238	45840	39254	86
14	MP	33	102	95	902	27103	7376	64
15	MUM	16	108	12	468	38007	20534	54
16	NE	7	111	33	174	6609	3774	57
17	ODI	19	104	74	494	20442	14017	69
18	PJB	20	107	9	607	20852	12732	61
19	RAJ	14	104	91	325	18867	13596	72
20	ROB	18	102	101	425	30873	23161	75
21	ROTN	9	105	34	226	17459	14985	86
22	UPE	22	104	135	529	23078	13089	57
23	UPW	11	104	44	273	23088	20325	88

B. Information w.r.t. POIs with RJIL as NLDO

S.No.	Licensed Service Area	No. Of E1s at POI	Percent utilization of E1s during busy hour	Terminating Traffic in Erlangs during busy hour (i.e. Traffic originated in the network of RJIL)
1	AP	4	118	121
2	ASM	3	131	95
3	BIH	5	109	143
4	CHN	2	119	54
5	DEL	18	107	553
6	GUJ	5	110	144
7	HAR	5	109	142
8	HP	2	131	60
9	JK	1	114	22
10	KAR	4	120	121
11	KER	2	131	58
12	KOL	4	119	122
13	MAH	7	112	213
14	MP	6	117	186
15	MUM	7	113	214
16	NE	2	130	58
17	ODI	4	112	114
18	PJB	6	115	184
19	RAJ	9	103	256
20	ROB	6	111	179
21	ROTN	2	137	49
22	UPE	9	102	254
23	UPW	10	106	294