

Consultation Paper on Internet Telephony (VoIP)

- 1. What should be the additional entry fee, Performance Bank Guarantee (PBG) and Financial Bank Guarantee (FBG) for Internet Service providers if they are also allowed to provide unrestricted Internet Telephony?**

Response:

Internet Telephony is just one of the many services (such as chatting, browsing, email) that internet technologies have made possible and convergence of voice, text and video is inevitable. Internet Telephony cannot be treated as a standalone application or service and has to be viewed as a part of the Internet ecosystem.

ISPs should be freely allowed to provide unrestricted Internet Telephony with no extra entry fee, no extra Performance and Financial Bank Guarantee, just as they are freely allowed to provide email, browsing and chat services.

ISPs with unrestricted Internet Telephony should be charged the same licensee fee as existing on Internet Telephony services.

- 2. Point of Interconnection for Circuit switched Network for various types of calls is well defined. Should same be continued for Internet Telephony calls or is there a need to change Point of Interconnection for Internet Telephony calls?**

Response:

IP interconnect should be allowed. As all networks are gradually moving to internet transport. IP interconnect would help in overall reducing the points of interconnection and cost of interconnection.

- 3. Whether accessing of telecom services of the TSP by the subscriber through public Internet (internet access of any other TSP) can be construed as extension of fixed line or mobile services of the TSP? Please provide full justification in support of your answer.**

Response:

Yes, this should be considered as an extension of TSP as well as Internet Service Provider.

- 4. Whether present ceiling of transit charge needs to be reviewed or it can be continued at the same level? In case it is to be reviewed, please provide cost details and method to calculate transit charge.**

Response:

Present ceiling of transit charge should be charged at the same level.

- 5. What should be the termination charge when call is terminating into Internet telephony network?**

Response:

Termination charge should be as per prevailing IUC charges. There is separate IUC consultation paper from TRAI and this termination charge to and fro from internet telephony should be taken up in IUC consultation.

- 6. What should be the termination charge for the calls originated from Internet Telephony Network and terminated into the wireline and wireless Network?**

Response:

Termination charge should be as per prevailing IUC charges. There is separate IUC consultation paper from TRAI and this termination charge to and fro from internet telephony should be taken up in IUC consultation.

- 7. How to ensure that users of International Internet Telephony calls pay applicable International termination charges?**

Response:

This is the requirement to be met by all Telecom Service providers including ISP with telephony providers. This is already a part of network installed and operated. Since April 2002, International Internet Telephony is operational. Presently there is forbearance on such international termination. Service providers fix tariff and make sure that the calls are billed as per service provider assigned tariff for international termination.

In short capability already exists over last 14 years for charging as per applicable International Termination charges, presently under forbearance, as per assigned Tariff by Service Provider.

It is apt to mention here that Server/Switch for such calls is to be kept in its service area. And all Call Detail Records (CDR) for each and every call is maintained.

8. Should an Internet telephony subscriber be able to initiate or receive calls from outside the SDCA, or service area, or the country through the public Internet thus providing limited or full mobility to such subscriber?

Response:

As long as the user is in licensees' network /service area, it should be allowed to receive calls but to not initiate calls outside service area of the licensed network.

There is need to ensure that all Apps are also brought under same service same rules such that they pay applicable service tax, license fees and maintain CDRs within India. In face all along, such unauthorized/unlicensed services are prevalent depriving the country of revenue. And grave security risk as no CDRs are available

9. Should the last mile for an Internet telephony subscriber be the public Internet irrespective of where the subscriber is currently located as long as the PSTN leg abides by all the interconnection rules and regulations concerning NLDO and ILDO?

Response:

Our view is that subscribers should be entitled to receive the best Quality of Service (QoS) for all communication needs. No restrictions should be placed.

10. What should be the framework for allocation of numbering resource for Internet Telephony services?

Response:

A separate number series should be created for ITSP services and sold to ITSPs at a reasonable price. Mechanisms should be instituted to prevent hoarding of number resources. TSPs should be mandated to carry and route these calls.

11. Whether Number portability should be allowed for Internet Telephony numbers? If yes, what should be the framework?

Response:

Number portability for ITSPs should be allowed on the same. A framework to be set up by the agency controlling the number resources. CDRs should have field to identify ITSP.

12. Is it possible to provide location information to the police station when the subscriber is making Internet Telephony call to Emergency number? If yes, how?

Response:

Yes, it is possible to provide location information and needs coordination and interworkability among all service providers.

13. In case it is not possible to provide Emergency services through Internet Telephony, whether informing limitation of Internet Telephony calls in advance to the consumers will be sufficient?

Response:

As replied in Q12, till framework is developed for assigning location, consumers to be informed in advance.

14. Is there a need to prescribe QoS parameters for Internet telephony at present? If yes, what parameter has to be prescribed? Please give your suggestions with justifications.

Response:

The QoS of Internet Telephony calls has been improving exponentially over the past few years. Although there are many parameters that can be monitored such as PDD, ASR, ACD, lost media packets etc., these have been found to be of little use to judge users' subjective experience. We believe that QoS should not be prescribed. We believe market forces will ensure QoS, just as mobile subscribers are switching carriers due to call drops.

15. Any other issue related to the matter of Consultation.

Response:

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