



MTNL/RA/TRAI-C.P.-13/2016  
Dated 05.09.2016

To,

The Advisor (B &PA)  
TRAI, New Delhi

Sub. : Comments on TRAI Consultation Paper dated 22.06.2016 on "Internet Telephony".

TRAI issued Consultation paper on 22.06.2016 on the aforesaid subject and asked the various stakeholders to comment on the issues involved in the consultation paper. In this reference following comments are submitted for consideration:

**Q1: 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?**

**MTNL Response :** As it has already been mentioned by TRAI that the unrestricted Internet telephony is permissible under unified license with authorization for access services. Therefore in order to maintain the level playing field, MTNL is of the opinion that ISPs should not be allowed to offer Internet Telephony. Any ISP willing to provide Internet Telephony can acquire Unified License with authorization to access services with entry fee of Rs 15 Cr.

**Q2: 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?**

**MTNL Response :** TRAI has issued consultation paper on IP interconnection wherein MTNL submitted that:

1. The IP based interconnection technology in India is at evolving stage, and should be allowed to mature over a period of time and then the issues experienced over time of development, may be addressed/ deliberated. At this stage framing Regulation/control is not justified.
2. The existing technology cannot be discarded at random with advent of new technology as huge investments have already been made by operators in existing networks. As mandating new technology will force operators to make further huge investments and that will not be justified in the present scenario, as the industry is already debt ridden.

3. The compatibility of the IP based interconnect system with existing nodes(exchanges) is to be ensured/ validated and also it should always be the responsibility of new technology adopter to connect with the old technology system i.e. there should be downward compatibility with existing technologies, which is also worldwide accepted & adopted phenomenon.
4. The technology up gradation for interconnection from TDM to IP, involves many issues like tariff/ charging issues, charging for NLD/ILD calls, numbering plans, and also includes various technical issues like routing, IP interconnection standard protocols, technical specifications, emergency services etc.
5. If deemed fit, a proper detailed study may be carried out regarding feasibility /implementation of the aforesaid technology including technical issues may be referred to TEC for study and their recommendation.

DOT has also made change in the license condition vide its letter No. 20-502/2016-AS-I, dated 19.04.2016 as below:

*"27.3 Interconnection between the networks of different Licensees for carrying circuit switched traffic shall be as per national standards of CCS No.7 and for carrying IP based traffic as per Telecom Engineering Centre (TEC) standards as amended from time to time by Telecom Engineering Centre (TEC) and also subject to technical feasibility and technical integrity of the Networks and shall be within the overall framework of interconnection regulations/ directions/ orders issued by the TRAI/ Licensor from time to time. For inter-networking between circuit switched and IP based network, the Licensee shall install Media Gateway Switch. Further, the Licensor may direct the LICENSEE to adopt any other technical standards issued by TEC on interconnection related issues"*

Therefore the existing service provided need not to be mandated to make any change at their POI side while any TSPs new or existing launch the Internet Telephony. Regarding IP interconnection, it may be left to the operators to negotiate.

**Q3: 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.**

**MTNL Response :** Access of telecom services through public internet provide the facility to customer to avail services from anywhere and it has its certain distinct characteristics, therefore should be treated as a separate service as "Internet Telephony".

**Q4: 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.**

**MTNL Response :** Transit charge may be kept as of present level.

**Q5: What should be the termination charge when call is terminating into Internet telephony network?**

**Q6: What should be the termination charge for the calls originated from Internet Telephony Network and terminated into the wireline and wireless Network?**

**MTNL Response :** Termination charges for calls terminated to Internet telephony may be zero while from Internet telephony to wire line to wireless may be kept at around Rs 0.20/- per minutes because

4. the internet Telephony facilitates the provider to offer services at low cost .
5. Further it will also erode the International termination charge if its customer makes call out of the country.
6. Internet Telephony is low cost latest technology with many premium feature which will be inconsistent with the investment of the existing operators offering voice on circuit switching.

**Q7: How to ensure that users of International Internet Telephony calls pay applicable International termination charges?**

**MTNL Response :** As at this stage it is not possible to know the origin of location of call, hence it is not possible to ensure the payment of applicable termination charges. (also mentioned by TRAI in CP vide para's 4.12 & 4.28 ) This will cause the churning of customers of existing service providers to Internet telephony Service provider.

**Q8: 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?**

**MTNL Response :** Since it is the advantage of technology and hence no such restriction to be placed. However at the same time the interest of wireline/wireless access provider needs to be ensured due to their huge investment in these technology and therefore it can not be discarded.

**Q9: 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?**

**MTNL Response :** Yes. This is by definition that *"Internet telephony is the use of the Internet rather than the traditional telephone company infrastructure and rate structure to exchange spoken or other telephone information."*

**Q10: What should be the framework for allocation of numbering resource for Internet Telephony services?**

**MTNL Response :** There should be separate numbering scheme in view of response of Q5&6.

**Q11: Whether Number portability should be allowed for Internet Telephony numbers ? If yes, what should be the framework?**

**MTNL Response :** It is too early to discuss number portability for Internet Telephony. Technological development ahead will facilitate the requirement.

**Q12: 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?**

**MTNL Response :** No Comment

**Q13: 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?**


**MTNL Response** : At this stage, limitation may be informed to customers. Future technological development and eco system will decide on the requirement.

**Q14: 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.**

**MTNL Response** : This is again a premature question. Let the technology first matured in the market, subsequently the QOS may be defined.

**Q15: Any other issue related to the matter of Consultation.**

**MTNL Response** : No Comments.

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