Reliance Communications Limited's Response to Consultation Paper on "Network Testing before Commercial Launch of Services"

Executive Summary:

A. Network Testing before commercial launch of services or products should not be made mandatory and should be left to the choice of the TSP.

B. Requirements of an existing TSP provisioning only additional services would be very different from the requirements of new TSP from testing perspective and hence should not be linked with the issues raised in this Consultation Paper for Network Testing requirements of a new TSP.

C. A new TSP intending to launch commercial services may be allowed to enroll subscribers as test users in case test SIM cards already issued to Employees and Business Partners are not in sufficient numbers to provide meaningful feedback of its service/network.

D. Test SIMs should not be allowed to be continued after commencement of Commercial services.

E. TSP should not be allowed to impose any charging/ tariff on users during test phase.

F. Temporary number resources should be allocated in small chunks to the TSP undertaking testing which needs to be returned to the DoT after testing phase is over.

G. Limit on number of active test SIMs/Users at a time should be prescribed as 1 Lakh per LSA.

H. Time period for testing should not be more than Three (03) months.

I. Test phase of TSP should not be subject to any regulatory and financial obligations except the requirements of Law Enforcement Agencies and Subscriber Verifications.

J. MNP facility should not be allowed for test users.

Our Question-wise response is as under:

Q1.   Should a TSP be allowed to enroll subscribers as test users and in such case, should there be any restrictions on the number of test SIM cards and the period of such use? Please justify your response.

RCOM's Response:

1. At the outset, we would like to submit that there is a need to distinguish a new TSP commencing commercial operations, from an Existing TSP provisioning only additional services for its existing or new users/subscribers. **Requirements of an existing TSP would be very different than the requirements of new TSP from testing perspective and hence should not be linked with the issues raised in this Consultation Paper for Network Testing by a new TSP.**

2. For a new TSP, Provision of Test SIM cards that are issued for service/ network testing purposes is already there and is also in practice however at present issuance of such cards is limited only to the Employees, business partners of the TSP.

3. **In case such test cards issued to Employee and business partners are not in sufficient number to provide meaningful feedback of its service/network, TSP may be allowed to enroll additional subscribers as test users.** However, at any particular point in time, total active test SIMs including all categories should not exceed the prescribed limit.

4. To keep a check on any misuse of such test cards and avoid any affect on other TSP's networks and services, **limit on number of test SIM/Users should be prescribed as 1 Lakh / LSA and the period of testing should not be more than Three (03) months.**

Q2. **To clearly differentiate test phase from commercial launch, which of the options discussed in Para 1.12 would be appropriate? Please provide justification. Please explain any other method that, you feel, would be more appropriate.**

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Q3. **Do you agree that the provisions discussed in Para 1.13 viz. information to the subscribers about test SIM being temporary etc., should be put in place for the TSP testing its network involving test users/subscribers? Please suggest other provisions which should be mandated during test phase?**

RCOM's Response:

1. We agree that providing full-blown services during test phase may have implications on the IUC, pricing, Reporting, QoS and other regulatory aspects. We would like to make following suggestions to deal with such issues:

   a. **A TSP should not be allowed to impose any kind of charging/tariff on users** during testing period and various QoS obligations & regulatory levies/costs including **payment of IUC to other TSPs should be waived during the period.**

Needless to mention, we already recommend implementation of Bill & Keep for IUC which is subject matter of other Consultation Paper of TRAI.

b. **Limit on number of active test SIMs and the time-period of testing** needs to be prescribed (see our response to Q1 above) to ensure bonafide use of such test cards. With this in force, there is no need of limiting testing only to a smaller geographical area of an LSA as suggested by TRAI in para 1.12.e.

c. Period of testing and **terms & conditions of usage and disconnection should be transparently communicated to the test user** at the time of enrollment itself.

d. **Test SIM Cards should not be allowed to be continued after commencement of commercial services by the TSP**.

e. **A temporary number series in smaller chunk** as suggested by the TRAI in para 1.12.c and 1.12.d for testing purpose may be issued which will further ensure that test SIMs and Users are not converted to commercial users. Being a separate number series, identification of such numbers will also ease and resolve various inter-operator issues including MNP, billing etc.

Q4. Is there a need to have a defined timeline for testing phase i.e. period beyond which a TSP should start offering commercial services? If yes, what should be the timeline? Please justify your response.

RCOM's Response:

Yes, as already recommended above, a timeline should be defined for testing phase subsequent to which commercially services can be commenced by a TSP. **Time period for testing should not be more than 3 Months.**

Q5. In case enrolling of subscribers as test users before commercial launch is allowed, whether subscriber related conditions and regulatory reporting requirements laid down in the license, be imposed for the test subscribers enrolled before commercial launch? Please provide justification to your response.

RCOM's Response:

We recommend that the **testing phase of TSP should not be subject to any regulatory and financial obligations except the requirements of Law Enforcement Agencies and Subscriber Verification** for activation of a connection.

Q6. **Should test users/subscribers of such licensees be given the facility of MNP? Please justify your answer.**

RCOM's Response:

1. Being a facility opted by subscriber basis mainly the commercial or quality of service related considerations, **MNP facility cannot be extended to test users.**

2. Further, **allocation of dedicated temporary number resource is recommended for testing which is returnable to DoT after the testing phase** is completed, facilities such as MNP cannot be allowed for such numbers.

Q7. **If there are any other issues/suggestions relevant to the subject, stakeholders may submit the same, with proper explanation and justification?**

RCOM's Response

1. Network Testing by Licensee or prior approval from Licensor should not be made mandatory before commercial launch of services or products and the same should be left to the discretion of the TSP. This will avoid unnecessary delays in launch of services.

2. There is a need to distinguish a new TSP commencing commercial operations, from an Existing TSP provisioning only additional services for its existing or new users/subscribers. Requirements of an existing TSP would be very different than the requirements of new TSP from testing perspective and hence should not be linked with the issues raised in this Consultation Paper for Network Testing by a new TSP.