12th June 2017

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
(Old Minto Road)
New Delhi - 110002

Kind Attn.:   **Shri Sanjeev Banzal**
                Advisor (Network Spectrum & Licensing)

Subject: **Consultation Paper on "Network Testing before Commercial Launch of Services".**

Dear Sir,

This is in reference to your Consultation Paper issued by the Authority dated 1st May 2017 on **"Network Testing before Commercial Launch of Services".**

As desired, we hereby enclose our response to the questions raised in your above mentioned Consultation Paper. We hope our response will be given due consideration. We shall be obliged to address any further queries from your good office in this regard.

Thanking you and assuring you of our best attention always.

Yours sincerely,

Satya Yadav
Addl. Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
For Tata Teleservices (Maharashtra) Limited

Encl: As above

TTL response to Consultation Paper on
"Network Testing Before Commercial Launch of Services"

Q1. Should a TSP be allowed to enrol 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.

TTL Response:

The Terms and Conditions of the Unified license mandates the TSPs to install and test all applicable systems before commencement of commercial services. The licensee has to ensure that its service meets the Quality of Service (QoS) standards prescribed by the Licensor or the Regulator. Failure on part of licensee to adhere to the Quality of Service standards is liable to be treated as breach of License Terms and Conditions. Also testing of systems and ensuring QoS is also important from commercial point of view as well, as in services segment, the subscriber experience is one of the important factors which lead to demand generation and bad customer experience may have an advert impact after the launch of commercial services.

Considering the above, TTL is of the view that TSPs should be allowed to enrol subscribers as test users during test phase, however the number of such test users may be restricted to a limited number as directed by the authority.

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.

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?

TTL Response:

TTL is of the view that there is a need to have a clear demarcation between the test phase and commercial launch of services due to difference in regulatory compliance. We thereby recommend, providing a temporary number series to the TSP for testing of network before commercial launch of services. This temporary number series may be withdrawn upon the commercial launch of services and a fresh number series shall be allocated to the TSP for enrolling commercial subscribers.

Since the test number series may be withdrawn upon commercial launch of services, the subscribers enrolled on the network in the test phase should be transparently communicated about the validity of the test SIMs and the time period after which these test SIMs would be deactivated.

In few cases such as International Roaming, Test SIMs are required on an ongoing basis, hence these test SIMs may not be deactivated.

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.

TTL Response:

Telecom sector is moving at a rapid speed in the county, towards adopting new & upcoming technologies. We are witnessing swift and high penetration of 4G LTE technology. Kick-start of proceedings on 5G services in the country is also expected shortly. TSPs would start the testing of 5G services on their network, after allocation of 5G spectrum.

Hence, In order to test and implement newer technologies by the new and incumbent TSPs on their respective networks, there is a need to define a timeline for the testing phase by the authority. Under TTL's opinion, 90 days of test phase may suffice, after which the TSP shall start offering commercial services to the subscribers.

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.

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

TTL Response:

TTL recommends allowing enrolment of subscribers as test users before commercial launch in a limited number. We feel that not all subscriber related conditions and regulatory requirement laid down in the license be imposed during the test phase except the requirements of Law Enforcement Agencies and Subscriber Verification for activation of a connection.

Since we have recommended that a temporary test number series should be allocated to the TSP during the test phase, which shall be withdrawn upon commercial launch of services and the test numbers would be deactivated, MNP facility on these numbers shall not be made applicable.

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

TTL Response:

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 may not be linked with the issues raised in this Consultation Paper for Network Testing by a new TSP.

For enterprise solutions it would depend upon the SLAs between the potential customers and the service providers.