

April 23, 2025

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Subject: Submission of comments on Pre-Consultation Paper on Review of existing TRAI Regulations on Interconnection matters dated April 3, 2025 ('**Pre-Consultation Paper**')

Dear Sir,

We write to you with reference to the captioned subject matter.

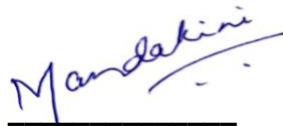
Interconnection forms the backbone of a competitive and efficient telecom system, a timely reassessment of which is critical in ensuring a fair, transparent and forward-looking environment.

We wish to commend and congratulate the Authority for this initiative and extend our sincere thanks for the opportunity to submit our comments in response to the Pre-Consultation Paper.

Please find enclosed our response the Pre-Consultation Paper, which includes our views, suggestions and recommendations based on practical experience and current market considerations. We trust that our inputs will assist the Authority in framing a robust and balanced consultation process.

We remain committed to supporting the Authority in its efforts to create an enabling regulatory framework and would be pleased to engage further on this subject.

Sincerely
For **RingCentral India Private Limited**



Mandakini Singh
Head - Regulatory
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Enclosed: As above

RingCentral's Response to the Pre-Consultation Paper on Review of existing TRAI Regulations on Interconnection matters dated April 3, 2025
(Consultation Paper No. 2/2025)

1. Monitoring adherence to prescribed Timelines for Interconnection

RingCentral has faced significant delays in building out its Indian network due to an overall lack of adherence to prescribed timelines for interconnection. As TRAI is aware, RingCentral had immense difficulty in getting service providers to execute interconnection agreements since it received its Unified License in August 2021. Post issuance of additional authorisations in October 2024 to RingCentral, it once again faced and is continuing to face similar unexplainable delays with certain providers in attempting to secure amendments to the agreements for addition of new circles. Once agreements are signed, providers continue to delay in interconnecting their networks. This has led to an inordinate delay in the launch of RingCentral services with limited network coverage resulting in significantly hampering its business interest. These practices not only discourage foreign players stifling investment opportunities but also undermine India's standing in the international market.

The Authority had foreseen the likely resistance towards a new entrant and thus, issued the regulations to counter such resistance by prescribing the timelines within which an interconnection agreement must be executed. However, in practice, the regulations on the interconnection timelines have been and continued to be flouted gravely. It is not practical for a new entrant to raise these complaints before the Authority as it not only affects the long-term relationship between the TSPs but also because providers' actions to delay interconnection appears to be an industry norm.

We, therefore, are of the view that Authority may consider instituting a mechanism for ongoing monitoring of interconnection requests made between service providers and adherence to the mandate that agreements be executed within 30 days of request submission. Further, Authority may also consider prescribing timelines for on ground implementation of interconnection and monitor it as well.

It is suggested that Authority may:

- (i) develop a reporting system for logging all interconnection requests along with their status updates.
- (ii) regularly monitor timelines for interconnection compliances.
- (iii) publish periodic compliance reports highlighting adherence by different operators.
- (iv) impose appropriate deterrents in cases of unjustified delay.

This proactive approach will help in timely resolution of interconnection issues, foster a more cooperative telecom ecosystem in line with the TRAI's objectives, and ensure greater transparency, accountability, and compliance with the existing interconnection regulations and guidelines issued by TRAI.

2. Regulate IP Interconnection and related charges

At present, the interconnection regulations primarily cover TDM interconnection in its scope. However, over the period, the technology has significantly evolved, and most interconnections now are preferred over IP.

As RingCentral, globally, has been an entity which operates on IP, it wanted to interconnect on IP even in India. However, we were met with arbitrary and unreasonable conditions which not only contributed to further delays in interconnections but also increased costs for setting up additional TDM infrastructure. As a result, RingCentral was forced to operate with legacy systems that hinder innovation and progress.

We are of the view that having regulations for IP interconnections will aid not only in adhering to the prescribed timelines mentioned in Point 1 above but also standardize the process with equitable access for all players.

One of the most important aspects of IP interconnections would be to revise the existing charges as well as to prescribe a ceiling on all types of interconnection charges and other financial conditions including set up costs, port charges, NPLC charges and Bank Guarantees. The charges / financial conditions must have a direct and clear linkage to actual usage. We recommend that any prescribed formulae to arrive at the charges and / or Bank Guarantees must be clear and concise with no room for any misinterpretations leading to a higher amount than intended by the Authority.

We expect that such regulations on IP would help in ensuring fair and transparent practices, foster healthy competition, minimize disputes, and protect the interests of all stakeholders including new entrants and smaller service providers.
