



DR P MAHALINGAM

Chairman, Door Sabha Nigam Limited, Chennai, India.

Dr.P.Mahalingam@gmail.com

8 August 2016

Telecom Regulatory Authority of India
New Delhi

**Response to Review of Audio Conferencing Licence
Voice Mail/ Audiotex/ UMS Licence**

Submission:

1 **Audio Conferencing market within India is less than Rs 99 crores. It is a SSI (Small Scale Industry).** There are four foreign companies and a few Indian companies. The maximum employees in any company in India is much less than 99. Connected capacity may not exceed 30,000 'ports'. The total revenue, including international carriage, of all companies from conferencing may not exceed Rs 200 Crores. The industry is still tiny in telecom.

2 Arbitrage with land line shows a pricing failure of landline service. This is a dispute between service providers. Conferencing is not the cause. If wine is free, water consumption will be distorted.

3 There is no justification to club it with Unified Licensing, just as tele-medicine and tele-education etc are not clubbed in a licence. It is well known that Small Scale players nurture new technology and services. Licensing audio conferencing will kill this sapling. It goes against the Prime Minister's objective and direction for the country.

6 'One Nation, One Licence' is a specious argument. Large interest is again trying to absorb a service that they have no direct competence in or cannot do. If they were capable they would have done it in the last twenty years. When we have one licence for everything from aviation to telecom, toilets and zoos we can include audio conferencing in that. As of now let those who can, do it and help the country grow.

7 Treat audio conferencing like a premises equipment. This should not be combined with any licence. Since the service itself is pan-India, the SDCA limits should be removed. Access and transport are anyway taken from licenced service providers.

Notes:

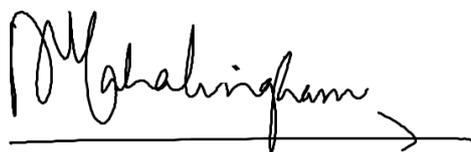
1 Audio Conferencing market within India is less than Rs 99 crores. It is a SSI (Small Scale Industry). Telecom Access providers in India sub-contract audio conferencing service. Most of get foreign specialty conference service providers to provide their conferencing. This is the proof that the revenues of conferencing are too meagre for telecom companies.

2 The Audiotex Insanity: The National Telecom Policy did not know of audio conferencing. The policy mentioned 'tele medicine, tele-xxxx'. The revised policy clubbed all others as 'OSP' category. Then international call centers applied for OSP licence. The category was then hijacked to them.

Audio Conference Service Providers could not get connectivity from Service providers without some official paper. Only one document, Audiotex specifications, mentioned the magic words 'audio conferencing'. Audiotex licence was impressive with some 100 pages. So it was a precaution against DoT kneejerk interpretation and shutting down the service. The Audiotex insanity was born: No relation to the product, none to the technology and totally irrelevant and insufficient for service.

5 Audio Conferencing Licence: The question is not about Audiotex. Service providers say it should be all bundled into one Unified Licence. This is typical of the Permit Licence Raj. Fight until you get into the train and then prevent others from getting in.

Thank you

A handwritten signature in black ink, appearing to read 'Mahalingam', written over a horizontal line that ends in an arrow pointing to the right.

Dr P Mahalingam