

महानगर टेलीफोन निगम लि०

(भारत सरकार का उद्यम)

Mahanagar Telephone Nigam Ltd.

(A Government of India Enterprise)

CIN: L32101DL1986GOI023501



No: MTNL/RA/TRAI CP/NW-Testing/2017

Dated 29.05.2017

श्री

Advisor (NSL),

TRAI, New Delhi.

Sub: MTNL comments on TRAI Consultation paper "Network testing before Commercial launch of Services" dated 1st May 2017

Sir,

Kindly find enclosed herewith MTNL's response on the consultation paper "Network testing before Commercial launch of Services" as **Annexure-I**.

Handwritten signature
29/5/2017
DE(RA&C)

Encl: As above

ANNEXURE-I

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.

Comment:

Before commercial launch of any new service, a TSP normally carries out extensive testing; so as to fine tune the network parameters for meeting the customer aspirations and Quality of Service requirements of the license. However, before commercialization of services, there may be obvious need to carry out different functionality tests and to check QoS parameters on real traffic conditions. Accordingly, in our opinion, a TSP may be allowed to enroll few subscribers as test users. However, ***the maximum limit for enrollment of such test subscribers should be clearly defined in the license as a certain Percentage (say 2-5%) of network switching capacity of the TSP in that service area.*** Further, it should be left on to the TSP that whether this limited test users may be from open public or from any specific group like business users, roaming partners , own employees etc.

It is felt that the prolonged testing period of any new service, free of cost with unlimited number of test users certainly hits the commercial interest of other incumbent TSPs, deteriorate their network QOS, causes choking of POIs etc due to enormous increase in incoming traffic. Accordingly, to maintain level playing field and safeguard the commercial interest of incumbent TSPs, , ***the period of testing should be limited to maximum 45-60 days only with the limited users and under no circumstance(s), further extension should be granted to the TSP.***

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.

AND

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?

Comment:

To clearly differentiate test phase from commercial launch, the testing period should be clearly defined. **Further, following methodology may be adopted:**

- (i) Only limited number of subscribers **on temporary basis** should be enrolled for testing purpose, as defined by the licensor.
- (ii) The testing should be carried out for **limited period** only, as defined by the licensor.
- (iii) A **temporary number series** may be allotted to the TSP for testing purpose only, which may be withdrawn after completion of defined testing period.
- (iv) Subscribers should be transparently informed that they are enrolled for testing purpose only and their numbers will be withdrawn after completion of testing period.
- (v) No fee / charges of any kind should be imposed on / recovered from test users for the test services offered during testing period.
- (vi) Details about number of test subscribers / SIM may also be provided to the licensor and security agencies for monitoring purpose.
- (vii) Before closure of test phase, test users may be informed suitably that the test phase is going to be over and their services will be terminated after that.
- (viii) Detailed testing report along with observations during testing phase & remedial actions taken may be submitted by the TSP to the

licensor upon completion of testing phase & prior to commercial launch of services along with an undertaking that the purpose of testing has been met and all remedial actions have been taken by them for the deficiencies found during testing phase. .

- (ix) Penalty provisions may be kept for enrollment for test users more than the limit prescribed by the licensor or for extending the testing period by the TSP without prior approval from the licensor.
- (x) Further, to avoid intermittent conduct of testing, a TSP may be allowed to conduct testing with limited test users, only once during the validity of its license in a service area.
- (xi) To take care of the business interest of other TSPs, in our opinion, any TSP may not be allowed to conduct testing simultaneously on PAN India basis. Simultaneous Testing by a TSP may be restricted to 2-3 LSAs at a time.

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.

Comment:

As mentioned under reply to Q1 above, there should be clearly defined timeline for testing phase. In our opinion, ***the period of testing should be limited to maximum 45-60 days with the limited users and under any circumstance(s), further extension should not be granted to the TSP.*** Moreover, after completion of testing phase, the commercialization / commercial launch of services may be left onto the TSP.

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.

Comment:

In case enrolling of subscribers as test users before commercial launch is allowed, **following activities may be made mandatory:**

- (i) Subscriber verification to know the genuineness of each & every enrolled subscriber.
- (ii) Licensor & security agencies may be informed about the enrolled subscribers as defined in the license. This is critically important in the interest of national security.
- (iii) The test users may be purely on temporary basis and after completion of pre-declared testing phase, their numbers should be withdrawn. Accordingly, there appear to be no reason for allowing MNP facility to temporary test users.
- (iv) Prior to closure of testing phase, test users should be transparently & timely informed that testing is about to complete and their services are going to be withdrawn / terminated. Exact date & timing of the same may be conveyed to all the test users.

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

Comment:

The test users may be enrolled purely on temporary basis and after completion of pre-declared testing phase; their numbers should be withdrawn / terminated. Accordingly, there appear to be no reason for allowing MNP facility to temporary test users.

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

Comment:

No comments
