



**TTL Response to the TRAI Consultation Paper on Review of Voice Mail / Audiotex /
Unified Messaging Services Licence**

Q1. In view of the discussion in Para 2.13, is it necessary to have a separate standalone licence for Voice Mail Service? If so, why? Please provide detailed justification?

Q2. If the answer to the Q1 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?

Q3. In view of Para 2.17 and present technological developments, is it necessary to have a separate standalone licence for only Audiotex Service? If so, why? Please provide detailed justification?

Q4. If the answer to the Q3 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?

Q5. Whether there is a need for standalone licence for providing Audio Conferencing Service? If yes, whether the technical specifications need to be explicitly defined? Please provide detailed justification?

Q6. If the answer to the Q5 is in the affirmative, what should be the technical specifications for providing Audio Conferencing Service?

Q7. Is it necessary to have a separate licence for Unified Messaging Service when holding an ISP licence is mandatory to provide the Unified Messaging Service and standalone ISP licensee is also allowed to provide Unified Messaging Service? If so, why? Please provide detailed justification?

Q8. If the answer to the Q7 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?

Q9. In case Voice Mail/Audiotex/Unified Messaging Service requires a licence should they be made a part of the Unified Licence as one of the services requiring authorisation? Please provide detailed justification?

Q10. If the answer to the Q9 is in the affirmative, what should be Service Area? Whether Service Area may be similar to the Service Area of ISP (National Area, Telecom Circle/Metro Area, Secondary Switching Area) to bring in uniformity among the Service Areas of different services? Please provide detailed justification?

Q11. If Voice Mail/Audiotex/Unified Messaging Services is made a part of the Unified Licence as one of the services requiring authorisation, then what should be the Entry Fee?

Q12. Whether there should be any requirement for Minimum Net worth and Minimum Equity for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?



Q13. The annual licence fee for all the services under UL as well as for existing UASL/CMTS/Basic Service/NLD/ILD/ISP licensees have been uniformly fixed at 8% of AGR since 1st April 2013. Whether it should be made same for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence? If not, why?

Q14. In case the answer to the Q13 is in the affirmative then what should be the definition of AGR for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?

Q15. What should be Performance Bank Guarantee, Financial Bank Guarantee and Application Processing Fee for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?

Q16. Whether the duration of the licence with Voice Mail/Audiotex/Unified Messaging Services authorisation be made 20 years as in the other licence authorisations under Unified Licence? If not, why?

TTSL RESPONSE to Question No. 1 to 16

The points raised in the consultation paper seeking comments regarding Review of Voice Mail / Audiotex / Unified Messaging Services Licence, primarily relate to the terms and conditions of a fresh license and those for migration of existing licensees in addition to issues like Entry Fee, Revenue Share etc.

The present guidelines from the Government on the subject matter provide for a simple application format for seeking license for operations.

With the unified license in place, and the government already granting such unified licenses, it is felt that there is no new requirement of having a separate standalone license for Voice Mail / Audiotex / Unified Messaging Services. Similarly, there is no need for a separate format for a standalone one

We are of the view that the Unified License has enough and sufficient provisions for its licensees to offer such messaging services as part of the existing unified license agreement.

Thus, there is no need for following any new and additional technical specifications, authorisation, additional specific requirement of minimum net worth, revenue share arrangement, PBG/FBG etc.

Existing unified license conditions should automatically authorise, the operations of Voice Mail / Audiotex / Unified Messaging Services.

The market forces will in any case take care of the technical requirements as the licenses thankfully are technology neutral.

Also, There is no need of separate requirement to consider issues related to license duration as, it would be similar to that of existing licenses. The same applies for revenue earned by the licensee.

Q17. What should be the terms and conditions for the migration of the existing Voice Mail/Audiotex/Unified Messaging Services licensees to Unified Licence?



Q18. Whether the existing Voice Mail/Audiotex/Unified Messaging Services licensees may be allowed to continue or it would be mandatory to migrate to the Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?

Q19. What should be the annual licence fee for existing Voice Mail/Audiotex/Unified Messaging Services licensees who do not migrate to the Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?

TTSL RESPONSE to question No.17 to 19

Based on the arguments given above the existing licensee of Voice Mail/Audiotex/Unified Messaging Services shall get mandatorily allowed to migrate to Unified License without any need of a separate authorisation for these and such services.

Q20. Please give your comments on any related matter, not covered above.

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