



Dated: 15th January 2015

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Ref: **VC IPL Response to TRAI's Consultation Paper No. 15/2014 dated December 5, 2014 on 'Delinking license for networks from delivery of services by way of Virtual Network Operators (VNOs)'**

Dear Sir,

We are pleased to provide our response to the Consultation Paper on delinking of licenses for the networks from the delivery of services by way of Virtual network operators. Additionally we are a member of industry association, ACTO which has also filed response to the Consultation paper and we fully support the response filed by ACTO in this regard.

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Introduction

Verizon Communications India Private Limited (“**VC IPL**”) welcomes the opportunity to provide inputs for this very important and opportune paper on delinking of licenses for the networks from the delivery of services by way of Virtual network operators issued by the Telecom Regulatory Authority of India (TRAI) on December 5th, 2014 (“**Consultation Paper**”).

By way of background, our Company VC IPL has been awarded NLD/ILD license by the Department of Telecommunication vide License No.10-44/07-CS-III(NLD-20) dated 3rd January 2008 and vide License No.10-07/2007-CS-III(ILD-14) dated 3rd January 2008 respectively. VC IPL has also been awarded ISP license by the Department of Telecommunication vide License no .820-619/08-LR dated 16th January 2009. VC IPL is a unit of Verizon Communications Inc which is a global IT & Telecom solutions provider catering to large and medium business and government agencies and serves 98 percent of the Fortune 500 companies. It provides enterprise data services to multinationals, enterprise customers and the BPO and ITES sector customers for their connectivity requirements in multiple locations across the globe.

In its Consultation Paper on VNO, TRAI has asked for inputs from the industry on various issues that may arise and the need and timing for introduction of VNO in india. Before deliberating on the issues raised in the consultation, it would be relevant to quote from the recently announced National telecom Policy (NTP) 2012 which inter alia lays down the strategies of the NTP-2012 to Facilitate resale and the role of new technologies in furthering public welfare

Quote

“3.3. To move towards Unified License regime in order to exploit the attendant benefits of convergence, spectrum liberalization and facilitate delinking of the licensing of Networks from the delivery of Services to the end users in order to enable operators to optimally and efficiently **utilise their networks and spectrum by sharing active and passive infrastructure**. This will enhance the quality of service, optimize investments and help address the issue of the digital divide. This new licensing regime will address the requirements of level playing field, rollout obligations, policy on merger & acquisition, non-discriminatory interconnection including interconnection at IP level etc. while ensuring adequate competition”.

3.8 To **facilitate resale at the service level** under the proposed licensing regime – both wholesale and retail, for example, by introduction of **virtual operators** – in tune with the need for robust competition at consumer end while ensuring due compliance with security and other license related obligations

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11.2. To facilitate the role of new technologies in furthering public welfare and enhanced customer choices through affordable access and efficient service delivery. The emergence of new service formats such as **Machine-to-Machine (M2M) communications** (e.g. remotely operated irrigation pumps, smart grid etc.) represent tremendous opportunities, especially as their roll-out becomes more widespread.

Unquote

International Best Practice

International experience aptly demonstrates that the competition in the Telecom & ICT space is gradually shifting away from traditional competitors ie Pure vanilla network operators to virtual network operators (VNOs). The new breed of companies/operators are not only competing with the traditional telecom companies on price or superior network but also on enhanced customer experience and moving away from traditional to innovative business offerings tailor made to suit the business requirements of enterprise as well as small and medium businesses.

The role of VNO in such a multi operator scenario is very critical especially for the proliferation of cloud and Machine-to-Machine (M2M) services which is expected to drive usher in the next wave of telecom revolution in India and the next big opportunity in the mobile industry. As per industry estimates, M2M is forecasted to bring billions of M2M Connections online in the next ten years. Gartner predicts that by 2020 there will be more machines connected than people.

Given the tremendous opportunity that lies untapped in the cloud and M2M space there is a need for the introduction of VNO's to tap the opportunity in this space, as a fraction of these projections represents huge growth for sector.

Identification and addressing the barriers that restrict resell would ensure more efficient use of infrastructure, leading to enhanced competition, availability of innovative services and affordability in the sector. The current license regime needs to be amended to permit resale of all fixed or mobile telecommunications services both at wholesale and retail level including through VNOs. This will help allow customers and operators to benefits, including faster roll out of services having less tele density.

The focus of the government policy as reflected in the NTP-2012 has been to provide affordable access and efficient service delivery to the end users. Especially in the Indian context , where a vast majority of the population does not have access to basic healthcare services , emergence of new service formats that permit faster roll out and access to provide critical services can play a critical role in addressing some of these challenges. The role of VNOs for facilitating such

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M2M services thus becomes very relevant and becomes an important part of an Network operator's business model.

Globally it is seen that many MNO's are partnering with VNO's to be a part of the service delivery value chain and VNO's can really play a significant role in partnering with the MNO's to provide a bouquet of services in a more scalable and innovative fashion.

The VNO model can expand the distribution strategy of the MNO's and potential areas of innovation in the infrastructure sharing space.

Pursuant to the opening up of the telecom licenses for private sector in 1994-95, Telecom service providers in India have invested significantly in building the networks as part of their roll out obligations under the license, through the VNO , there is an opportunity for the network operators to leverage their already established networks & associated infrastructure and create innovative services and pricing plans and expand distribution channels for their services.

Traditional business models are also giving way to newer service formats as Business customers are becoming increasingly comfortable with service & pricing models that create maximum value for them. Internationally there are examples of TSP's embracing VNO business models to expand and drive growth.

In the US , as per the latest figures published by FCC there are more than 138 VNO operating in the US market as on first quarter of 2014 .

The additional competition in India's telecom markets resulting from introduction of VNO measures will benefit Indian businesses and consumers and the economy as a whole by ensuring competitive prices, new and innovative products and services and expanded customer choice. In addition, it is vitally important that TRAI work towards ensuring clarity and transparency in the rules and regulations that relate to VNOs. Such clarity and transparency in India's regulatory framework provides new entrants the necessary assurance that they can compete on a fair and equitable basis and fully enjoy the benefits of market opening reforms such as these.

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VC IPL's response to the specific questions in the consultation paper is enumerated as below:

Q1. (a) Is there any need to introduce more competition in service delivery by the way of introduction of VNO in the sector? If not, why not?

(b) If yes, is it right time to introduce VNOs?

VC IPL's Response:

This is certainly the right time to introduce more competition in service delivery segment by the way of introduction of VNO in the sector due to the following reasons:

- The Digital India Program views this as an important area to open up for further broadband growth.
- The National Telecom Policy 2012 vision as stated below
3.8 To **facilitate resale at the service level** under the proposed licensing regime – both wholesale and retail, for example, by introduction of **virtual operators** – in tune with the need for robust competition at consumer end while ensuring due compliance with security and other license related obligations
- VNOs will provide innovation in service or in terms of service delivery. The sooner we do, it would be better for the overall sectoral growth.
- The trends in the Indian telecom sector witness more shift to delivery of services. Hence the need for additional players in the service delivery segment in the form of VNOs.
- The introduction of VNO will lead to faster penetration of telecom services. There are lot of unserved areas where basic telecom connectivity, internet and broadband services need to be provided. The broadband penetration is very low in India and need to be aggressively pursued to meet the objectives of Digital India and NTP 2012.
- Introduction of VNOs will facilitate the success for the flagship program "Digital India".
- Introduction of VNOs has already proven success in many countries in last 10 years.
- Current level of competition in Indian telecom market may get reduced due to possible merger/acquisition among NSOs and VNO will ensure to keep up the level of competition for the benefit of end customers.
- Implementation of NOFN will ensure to have availability of huge bandwidth. In order to utilize this resource and address the key issue of service delivery, VNO will play an important role.

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Q2. Will VNO pose a threat to NSOs or will they complement their operations? Justify your answer.

VC IPL's Response:

Clause 3.3 of the NTP-2012 states:

“3.3. To *move towards Unified Licence regime* in order to exploit the attendant benefits of convergence, spectrum liberalisation and facilitate *delinking of the licensing of Networks from the delivery of Services to the end users* in order to enable operators to optimally and efficiently utilise their networks and spectrum by sharing active and passive infrastructure. This will enhance the quality of service, optimize investments and help address the issue of the digital divide. This new licensing regime will address the requirements of level playing field, rollout obligations, policy on merger & acquisition, non-discriminatory interconnection including interconnection at IP level etc. while ensuring adequate competition.”

VNOs will complement the operations of NSOs in providing service due to following reasons:

- Increase in the revenue of incumbent NSO without further investment in Capex and in turn it will increase ROI by optimum utilization of resources like spectrum, bandwidth, capacity, fibre, etc.
- It will be beneficial for VNO to reach niche areas for providing innovative services and spread their network/services indirectly. It will also create more competition and offer more choices to the customers.
- VNO and NSO will increase overall revenue of the telecom market when the barrier to resale is removed by the introduction of VNO.

Q3. How can effective utilization of existing infrastructure be improved? Can VNOs be a solution to achieve targets defined in NTP-12 for rural density?

VC IPL's Response:

Yes, **effective utilization of existing infrastructure will be improved.** VC IPL believes that VNO will be an effective stakeholder for efficient utilization of existing infrastructure. VNO's can address the issues of quality of service and delivery of service by means of innovative products and services. VNO's will play an equally critical role for further penetration in niche, unserved and underserved area in addition to improvement in service quality and delivery including

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generating content for delivery in local areas. Thus VNOs will be an important stakeholder to achieve targets defined in NTP-2012.

Q4. Does there exist a business case for introduction of VNOs in all segments of Voice, Data & Videos?

VCIPL's Response:

Yes, In the era of convergence, voice, video and data , **there exist a business case for introduction of VNOs in all segments of Voice, Data & Video.** While introducing VNOs in the sector, reliance should be on market mechanism rather than regulating what segment or service is to be permitted. The VNO model has mostly been about offering affordable, innovative, rebranded network operator's services and controlling and reducing operators own overhead costs. The regulatory framework should not identify or dwell on whether there is a supporting business case, before allowing VNOs to provide service. Instead, VNOs should be able to provide service, based on their business judgment that it may be profitable to do so in light of available market opportunities. A market based approach instead of a regulatory oversight in such matters will be most appropriate to serve the requirements of all the stakeholders.

Q5. Whether VNOs be introduced in all or some of the services notified in the UL? Please name the services and justification.

VCIPL's Response:

In the larger interest of spurring innovation and competition in the sector, VCIPL is in favour of allowing VNOs in all services notified in the UL instead of introduction in a piece meal manner in the current market scenario.

Q6. Is there sufficient infrastructure (active & passive including access spectrum) available with a TSP to meet its own requirement? Can TSPs spare available infrastructure for VNOs?

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VC IPL's Response:

The licensing and regulatory framework should allow complete sharing of both active and passive infrastructure in all respects across all categories of licenses. The matter relating to availability of infrastructure for sharing is best addressed between the NSO and VNO on a commercial basis.

Significant amount of active and passive infrastructure are available to meet any additional requirement of resources for VNOs. This will help both the existing operator by way of additional revenue and faster Return on Investment. Moreover, Government of India has ambitious target for NOFN which will generate huge bandwidth and capacity.

Q7. If any TSP is able to share its infrastructure with VNOs, what should be the broad terms and conditions for sharing the infrastructure?

VC IPL's Response:

Sharing of infrastructure between the VNO and NSO should be a matter of mutually agreed commercial agreement. The proposed regime should allow for sharing of both passive and active infrastructures. The reseller /VNO should be able to provide services on the strength of infrastructure of NSO.

The arrangements negotiated by Virtual Network Operator with the network operator must be settled on a purely commercial basis and there is no need for regulatory involvement in these arrangements. The VNO model works best where there is a willing network supplier with spare capacity and a desire to develop new channels to market which the VNO model provides.

Insofar as interconnection and other more forms of bottleneck infrastructure access is concerned, the VNOs should simply be treated on the basis the same regulatory regime that applies to NSOs.

The licensing and regulatory framework should allow complete sharing of both active and passive infrastructure in all respects across all categories of licenses.

Q8. Should VNOs be allowed to create their own infrastructure to reach out to niche markets? If yes, to what extent?

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VC IPL's Response:

Yes, VNO should be allowed to lay infrastructure where ever it may require for further penetration of connectivity to facilitate providing service. Cost sharing model with NSOs to lay additional infrastructure may also be encouraged on mutually negotiated commercial terms.

Q9. Should Local Cable Operators (LCOs) or Multi System Operators (MSOs) with cable networks be permitted to share infrastructure with VNOs to provide last mile connectivity?

VC IPL's Response:

Yes, we believe that LCO & MSO should be allowed to share infrastructure for last mile connectivity. This will definitely help to reduce the capex cost and help in optimal utilization of network thus making services more affordable to the customers.

Q10. Does the adoption of the VNO model requires an entirely new licensing regime or will a chapter or a separate section for VNOs added to the existing UL suffice?

VC IPL's Response:

VC IPL supports a light touch authorization process in the form of a registration for VNO in UL. This will ensure making the process simpler in line with Government of India's Ease of doing business approach.

Q11. Comment on what measures are required to ensure that the existing or new licensing regime takes care of future requirements of technological development & innovation and provides a clear roadmap for migration to existing service providers.

VC IPL's Response:

Current licensing regime should be flexible, technology neutral & service agnostic. It should be left to the choice of the operators for migration to new technology for providing innovative services.

Q12. In view of the complexity in the existing licensing regime as explained in Para 3.16 to 3.18, should India move towards NSO & VNO based licensing?

VC IPL's Response:

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VC IPL supports a light touch authorization process in the form of registration for VNO and not for NSO/VNO based licensing as separate category in UL.

The issue may be viewed from the following perspectives:

- Existing Telecom Licensees who already have networks on the ground and provide services to end users on the strength of the said networks, may wish to become VNOs may seek flexibility opt for a standalone & pure resell regime notwithstanding their existing network capabilities on the ground.
- New Entrants who may wish to enter the sector by becoming resellers VNOs.
- Separate Registration or License based framework regime for existing licensees as resellers VNOs.

The existing licensing regime does not distinguish operators based on creation of facility based networks and provision of service. As a consequence the existing licensees already included everything necessary for the provision of services over a carrier's own infra-structure. So there is no need to change the existing regime. What is required is enabling provisions to provide further impetus and push for resale of services at wholesale and retail level. One of the options could be through VNOs.

Alternatively this may relate to allowing new entrants as well as existing operators in the sector who may wish to become a VNO for which an authorization registration based model may also be looked into.

So the matter needs to be discussed in light of the above options. The objective would be to ensure that resale VNOs regime is encouraged for competition, innovation and affordability in the sector.

The experience in the US market is an important indicator to as VNO have fostered in the U.S. only because of the flexibility with which the VNOs are treated with low entry barriers. This flexibility has permitted proliferation of VNOs of the many different types & models identified by TRAI in the consultation. For example, the FCC does not require a VNO to obtain a license specifically to resell wireless services. Thus, an authorized provider of long distance services may include resold wireless service in its package without any additional license specific to the wireless component. VC IPL therefore urges TRAI to consider adopting this approach and not require licensed operators to obtain an additional VNO-specific license in cases where these operators simply resell the services of facilities-based carriers. This approach will benefit the public by facilitating the prompt offering of a wide range of services pursuant to different and innovative business models.

In this regard, TRAI should be guided, for example, by the evolution of the pro-competitive national deregulatory framework for Commercial Mobile Radio Service (CMRS) prescribed by

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Congress and implemented by the Federal Communications Commission (FCC), which has enabled both facilities-based and resale wireless competition to flourish in United States, with substantial benefits to consumers and the U.S. economy. In summary, the licensing / authorization framework should provide for entrants who wish to take both the role of network creator and service delivery as well as simply network creator or service delivery like VNO/Resellers.

Q13. If yes, whether existing licensees may be mandated to migrate to NSO & VNO based new licensing regime? What challenges will arise in the migration to the two types of licensing framework?

VC IPL's Response:

VC IPL does **not support** any mandate on compulsorily migration of the existing licensees to NSO & VNO based new licensing regime.

Q14. Should a VNO be issued a license at the National Level, or for LSAs as in the case of UL or should it be based on the host NSO license areas?

VC IPL's Response:

As suggested registration not license for VNO should be issued and applicable at national level which will have freedom to be attach with any NSO. The registration will be operator neutral and will have authorization to do business across the country with any NSO.

Q15. What should be the duration of a VNO's license. Should it be linked with the license of the NSO or should it be for 20 years, as in the case of UL?

VC IPL's Response:

VC IPL supports the registration based VNO authorization and validity duration of 20 years in line with other licenses.

Q16. Should there be any cap on the number of VNOs in as service areas for a particular service? If yes what should be the number? Please provide (a) service wise and (b) service area-wise numbers with justification.

VC IPL's Response:

VC IPL does not support any cap on the number of VNOs in a service area for a particular service as it will contain the level of competition. The purpose of introduction of VNO is to create

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more competition and make way for both basic and innovative services in niche, unserved areas. A VNO will likely work with a NSO but the regulations should not mandate linking to only one NSO. The VNO should have flexibility to work with all NSOs in the larger interest of serving customers.

Q17. Should there be restriction on number of VNOs parented to a NSO? Justify your answer.

VC IPL's Response:

As mentioned in the response to Q7/Q16, VC IPL is not in favour of a restriction on number of VNOs parented with NSO. It may defeat the main purpose and objective of introducing VNOs to stimulate competition and affordability.

Q18. Alternatively, should one VNO be permitted to parent more than one NSO per LSA?

VC IPL's Response:

Yes, VC IPL believes that the VNO framework should be as flexible far as possible and open. Both VNOs and NSOs will have different requirements in terms of what to offer and ability to support in the form of infrastructure. The matter may best be addressed through market based mechanisms based on commercially negotiated agreements between VNO and NSO.

Q19. What should be the eligibility conditions for becoming a VNO?

VC IPL's Response:

The eligibility condition should be company registered under the Indian Companies Act 1956 as applicable for any other business entity desirous of entering into telecom sector in India.

Q20. Whether an existing Unified Licensee with authorisation to provide all services shall be eligible to become a VNO of another Licensee in the same or other LSA. Or, will it need separate/additional authorisation to work as a VNO for delivering services for which it does not have access spectrum?

VC IPL's Response:

Yes, in order to allow operators to derive the benefits from resale while serving their customers, NSOs should be allowed to be VNO for optimum usage of resources and infrastructure. The same should be based on mutual agreed commercial agreements.

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Q21. Should there be any cross-holding restriction between a NSO & VNOs? If yes, please quantify the same with justification.

VC IPL's Response:

VC IPL is not in favour of any crossholding restriction between a NSO & VNOs. Depending on market conditions and the level of competition applicable provisions of competition law or M&A guidelines may best address the matter.

Q22. What should be the financial obligations of VNOs in the form of a) Equity & Networth b) Entry fee & c) PBG d) FBG etc? Please quantify the same with justification.

VC IPL's Response:

VC IPL believes that proposed VNOs be an entity registered under the Indian Companies Act, 1956. The Networth and Equity requirements are to be the same as required to register as Company under the Act.

The entry fee should be kept minimal to cover the Administrative cost as.

PBG: Will not be applicable as it is suggested to be under registration not license.

FBG: Will be applicable as required for LF in order to avoid any arbitrage opportunity but need to be ensured no multistage levy leading to double taxation. The definition of AGR should be reviewed accordingly to help address this issue.

Q23. Should a VNO utilise numbering resources, Network Codes and Location Routing Number (LRN) of the NSO. Or, should the Licensor allocate separate numbering resource, Network Codes and Locational Routing Number (LRN) directly to a VNO?

VC IPL's Response:

Yes. VNOs should be allocated separate numbering and other codes.

Q24. What operational difficulties could arise in the above arrangements?

and

Q25. In case your reply is that the Licensor allocates numbering resource to the VNO, then how can it be ensured that the resources allocated to a VNO are efficiently utilized? Should any obligation be placed on VNOs for efficient utilisation of resources?

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VC IPL's Response:

Licensor will allocate, upon request, numbering resources in accordance with the National Numbering Plan and with the regulations regarding the allocation of numbering resources and of the technical resources.

Q26. Should the LF & SUC applicable to the VNO be as per stipulated conditions of authorisation in UL.Or, should it be treated differently for VNO? Please quantify your answer with justification.

VC IPL's Response:

License fees should be applicable in order to avoid any arbitrage opportunity but it needs to be ensured that this does not results no multistage levy leading to double taxation. The definition of AGR needs to be reviewed accordingly to help address this issue.

As VNOs does not hold spectrum usage rights for the provision of mobile electronic communications; therefore, VNOs will not be charged any fees for the use of the radio spectrum. These fees will be paid by the host network operator.

Q27. Should an NSO be mandated to provide access to its network to a VNO in a time bound manner or should it be left to their mutual agreement?

VC IPL's Response:

No. As stated above, arrangements between VNOs and TSPs and other network providers should be a matter of commercial negotiation between the parties.

Q28. How can MNP be facilitated in the VNO/NSO model? Can the VNO be treated separately for MNP purposes? Or, should MNP be facilitated only through the network of the NSO?

VC IPL's Response:

The regime facilitating resale VNOs should have necessary provision for allotment of separate numbering arrangement for better administrative purpose in line with national numbering plan. The resellers VNOs should also have some capabilities to own some pieces of service delivery to be able to provide enhanced quality service to the end customers.

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Q29. Who is to be held responsible for CAF verification and number activation, the NSO, the VNO or both?

VC IPL's Response:

VC IPL is of the view that the party VNO or NSO who has the contractual agreement with the end user to be made responsible for CAF verification while Number activation to be done by NSO.

Q30. Should an NSO or VNO or both to be responsible for maintaining QoS standards as per TRAI's regulations?

VC IPL's Response:

The Quality of Service requirements should be applied depending upon who owns which part of service provisioning.

Q31. How should Mergers & Acquisitions be dealt with in the VNO/NSO licensing model. Should the recently announced M&A guidelines issued by the Government for existing players be extended to cover VNOs? Or should their M&A be treated separately?

VC IPL's Response:

VC IPL believes M&A for NSO/VNO should be left out at this stage. It may be taken up separately in future as it evolves in co-ordination with other ministries/departments entrusted to address the issue of competition.

Q32. Should the VNO be treated equivalent to the NSO/existing TSPs meeting obligations arising from Tariff orders/regulations/directions etc. issued by TRAI from time to time?

VC IPL's Response:

Yes. VC IPL believes that VNOs are also to be treated equivalent to the NSO/existing TSPs meeting the obligations arising from Tariff order/regulations/directions.

Q33. Please give your comments on any related matter not covered in this Consultation Paper.

VC IPL's Response:

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1. We recommend that **TRAI consider allowing resale of all kinds of services voice, video & data both at wholesale and retail level including via VNOs under the proposed regime** or suitable authorization mechanism under VNO similar to those in Europe and the US where a single, easily-obtained authorization allows operators to provide a broad range of data and voice services, fixed and mobile, facilities-based and resold, which has created the most dynamic telecom markets in the world with providers continuously able to offer new and innovative packages of services in response to customer demand and technological developments.
2. Regardless of how TRAI eventually decides to treat VNOs in India, however, it is vitally important that **TRAI work towards ensuring clarity and transparency in the rules and regulations that relate to VNOs** as an affirmative signal to new entrants and established players alike that this segment of India's telecom market is open and that all are able to compete on a level playing field.
3. **Ease of doing business & entry norms to be simplified and made flexible** promoting India as an attractive investment destination and VNO a viable investment proposition for the global investors.
4. It is also important that TRAI ensures when opening up any reseller market that the license fee regime does not frustrate the very goal of promoting competition and creating a level playing field among all service providers. Specifically, **the license fee should not operate as a multi-stage and cumulative tax**. Facilities-based operators such as NSOs relying on their own networks need only pay the license fee once, while the services that operators such as VNOs buy from other operators are subject to the license fee twice – once when they are sold from the first network owner (NSO) to the second operator (VNO) and then again when the second operator sells them to the end user. Thus, a telecom operator who buys inputs from other licensed operators is placed at a competitive disadvantage with those who do not need to buy these inputs if the license fee is levied at every sales point in the supply chain. In addition to creating this inequity, the license fee may have the effect of frustrating the Consultation Paper's goal of promoting competition and creating a level playing field.
5. VCIPL urges TRAI to consider the adoption of one of the following two suggestions as part of its VNO authorization regime to avoid this cascading impact: the application of an excise tax or a value-added tax. Under an excise tax regime, the license fee applies only to transactions where the service is provided to an end user. Intermediate or wholesale transactions where the purchaser is another carrier are not counted. Under a value-added tax regime, all providers would contribute on the basis of all of their sales;

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however, each carrier would be able to deduct the value of any telecom services it has purchased

6. While considering VNO, we also request to **address the issue of Convergence of Service / Networks / Devices i.e CUG/VPN-PSTN/Public network interconnection in line with the objectives of NTP-2012** which has not been duly recognized in the phase one of Unified License. This will be a key policy enabler for the BPOs/Enterprise Data services segment and fuel further growth of this very important sector. Convergence will enable sophisticated, Advanced and Open IP platform which will enhance the end-user experience and will efficiently address the growing business needs by leveraging on the best of both worlds.

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