CTOO ZONETEL SYSTEMS

3.1 Whether the current provisions under various licences (UASL, CMTS, Basic and ISP) are adequate to grow the MVAS market to the desired level? If not, what are the additional provisions that need to be addressed under the current licencing framework?

Existing licenses are enough to monitor and control any MVAS services running on top these core services. As long as the core internet and telephony services are monitor and regulated, application running on top of them by default are monitored

3.2 Is there a need to bring the Value Added Service Providers (VASPs) providing Mobile Value Added Services under the licensing regime? 3.3 If yes, do you agree that it should be in the category of the Unified Licence as recommended by this Authority in May 2010? In case of disagreement, please indicate the type of licence alongwith the rationale thereof.

VASP should not be under any licensing. Since core services on which VASP runs are licensed and monitored there is no need to license VASP. But there has to be regulation and penalties to avoid any misuse, which is back to back with VASP through service provider for similar to DNDC

 3.4 How do we ensure that the VAS providers get the due revenue share from the Telecom Service providers, so that the development of VAS takes place to its full potential? Is there a need to regulate revenue sharing model or should it be left to commercial negotiations between VAS providers and telecom service providers?

TSP should come out with clear engagement model on VAS, to be validated and enforced by the right government agencies. It should not be left at the will of TSP. TSP should clearly come out with revenue sharing model for different kind of services, percentages clearly defined on various parameters as volume, price etc. Also payment terms has to be clearly defined and adhered to. Clear engagement model will help MVAS provider plan their business. To encourage innovation process to engage with TSP for offering MVAS should be easy and clear guidelines on revenue share.

3.5 At the same time, how do we also ensure that the revenue share is a function of the innovation and utility involved in the concerned VAS? Should the revenue share be different for different categories of MVAS?

Revenue share should be based on revenues, more revenues more share. Certain MVAS services that are focused more towards social welfare should be separate category, and should get some support from the govt to ensure services can be offered at low cost to the users, while revenues are enough to provide the services

3.6 Do you agree that the differences come up between the MIS figures of the operator and VAS provider? If yes, what measures are required to ensure reconciliation in MIS in a transparent manner?

Difference in MIS is quite obvious as these are real-time billing and VAS platform are not build as perfect as TSP billing systems.

Since TSP billing systems are the best to give MIS, they can for the base for MIS. Also MIS are monitored by Govt agencies to ensure that they are as specified by TSP. Regulations are to be enforced so that these MIS are not tampered.

3.7 (i) Does existing framework for allocation of short codes for accessing MVAS require any modifications? Should short codes be allocated to telecom service providers and VAS providers independently? Will it be desirable to allot the short code centrally which is uniform across operators? If yes, suggest the changes required along with justification.

Short codes since they are applicable across the TSP should be allotted by central agency. Central agency should come out with the list of short codes that are informed to all TSP to incorporate in the switching. MVAS providers will engage directly with central agency to acquire a short code.

(ii) Should there be a fee to be paid for allotment of short code?

Yes there has to be fee. This will ensure only MVAS provider serious about their services applies for it.

3.8 Is there a need to provide open access to subscribers for MVAS of their choice? If yes, then do you agree with the approach provided in para 2.46 to

provide open access? What other measures need to be taken to promote open access for MVAS? Suggest a suitable framework with justifications?

Because of close access lots of MVAS developer are never able to launch the services, or they have to goto existing MVAS providers to launch their services which minimizes there returns. We completely agree to the approach, which will lead to stop the monopoly of TSP and MVAS providers and also allow services to be offered to the end customer at better rates.

Today MVAS services running outside the TSP network, have no means of revenue collection or monetization. With this new system in place it would be easy to monetize services without being forced by the TSP for services and content.

Agency responsible for short code distribution can also ensure that revenues across multiple service providers are collected and paid to the MVAS provider. Each TSP to provide MIS at the end of the billing cycle to the MVAS provider.

3.9 What measures are required to boost the growth of utility MVAS like m-commerce, m-health, m-education & m-governance etc. in India? Should the tariff for utility services provided by government agencies through MVAS platform be regulated?

All the VAS services target towards the social welfare should be kept in separate category and should get support from govt (lower taxes etc.) to keep the cost to end customer at minimum, which should be regulated by the govt. Different services depending on customer segment should have different tarrif and different rebates to ensure enough revenue to the provider

3.10 Any other suggestions with reasons thereof for orderly growth of mobile value added services?

1.   New rules for KYC for TSP: With older rules physical document has to be signed and stamped. Newer mechanism of applying online and using digital signature should be bought in, this will bring down the delivery timelines for MVAS providers applying for TSP services like E1 and leased lines.

Thanks,

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