

Sl. No	Consultation questions	Ozonetel observations / remarks
1	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?	<p>Separate and stand alone license for voice mail service is not required now.</p> <p>Current generation phone devices, their power/configuration, potential of the applications that can be ported on the same just make it possible to enable these services without any dependence on the basic fixed access services. Offline voice messaging is what we call as voice mail, can now be recorded on the phone and sent as an attachment through any mobile app and/or any other OTT service as well.</p> <p>Multiple modes of real time chat facilities available on the social media and available OTT applications along with a plethora of new and emerging services make it just irrelevant to the times we live in now.</p>
2	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?	Not Applicable as the answer to Q1 is negative.
3	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?	There is no necessity to have a separate standalone license for only Audiotex service.
4	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?	Not Applicable as the answer to Q3 is negative.
5	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?	<p>There is no need for a standalone license for providing audio conferencing service. Up-to 10 party real-time and on-demand audio conference is enabled through phone devices itself.</p> <p>The same stand will hold good for multiparty audio conferencing services that are facilitated through dedicated call conference bridge infrastructure and used for captive internal use of an organization.</p> <p>However, if the same service is meant to be sold as a service to multiple clients on the same conferencing infra, suitable regulatory registration mechanism may be designed and enforced to ensure that the end clients are assured to receive</p>

		<p>the committed quality of the service as subscribed, and as defined in the said regulatory registration framework. There should be client grievances redress mechanism also built into the said regulatory registration mechanism.</p>
6	<p>If the answer to the Q5 is in the affirmative, what should be the technical specifications for providing Audio Conferencing Service?</p>	<p>The Technical specifications need not be defined by the regulatory body. Let the service providers use whichever technology is best and cost effective for the applications they choose to deploy. The reason being, increasingly the hardware dependency is coming down and cloud based services for audio and video conferencing is now available. Also the networks are increasingly leaning towards software defined and today even networks are also offered as a service. Many dimensions of the infra services and software components being made available on Opex models now a days. So we feel there is no need to hard define the specifications, which might have been relevant in earlier times when there were dedicated HW boxes for each of the applications which had to be necessarily procured. Today any HW is available as a service in most Data Centres.</p>
7	<p>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?</p>	<p>The messaging today covers:</p> <ul style="list-style-type: none"> • Text Messages through SMS/OTT services. • Mail Services using SMTP Mail Servers. • Fax messaging, losing relevance as anyone can take a picture of the document and send it through any OTT service almost in real time. • Video messages. • Voice messages. • File transfers. <p>All of the above can be done by any end user without holding any ISP license.</p> <p>Also there is no one service provider who is offering such unified messaging as a service covering all of the above.</p> <p>So we feel there is no need for any license to cover the said unified messaging.</p>
8	<p>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?</p>	<p>Same as answer to Q 6 above.</p> <p>There is no need to hard define the specifications, which might have been relevant in earlier times when there were dedicated HW boxes for each of the applications which had to be necessarily procured. Today any HW as well as systems software licenses are available as a service in most Data Centres</p>
9	<p>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</p>	<p>These value added services may not be made a part of the Unified licensing regime, which mostly covers the BSOs.</p> <p>Please treat all these services a value added “Communications as a service-CaaS” under one umbrella. Please design and enforce a separate registration for such CaaS service providers enabling them to handle all kinds of voice, video and text communications through available technology platforms.</p> <p>The current Audio Tex License prohibits patching two (whether incoming call to an outgoing call patching or two</p>

	justification?	<p>outgoing calls to be patched from the same or different PRIs/SIP channels on the hosted platform) calls in real-time on a hosted platform. This is the basic principle of Cloud Telephony and hence this must be allowed to encourage the Cloud Telephony platforms now in whichever form the new regulatory frame work is sought to be reframed.</p> <p>These services essentially ride on the voice and data service offerings if BSOs. The voice lines and data circuits shall be subscribed from BSOs and deployed on platforms to enable these value added services to the businesses and retail end customers alike. (The CaaS providers should be free to choose the BSO, depending on technical, commercial and reach considerations).</p> <p>Please enable CaaS providers to bulk subscribe the required basic (raw) MDNs (both wireless services as well as wire-line services) from BSOs and augment these MDNs with business intelligence as demanded by the markets.</p> <p>CaaS providers may be enforced with desired audits and checks to ensure that there is a strict adherence to KYC for every MDN that is offered as a service, apart from the CDR logs for all call flow that happens through these MDNs and CaaS platforms.</p> <p>Periodic regulatory audits on the MDN inventory held by these CaaS operators for ensuring adherence to regulation may be enforced.</p> <p>Allowance should be granted for these CaaS operators to retail the value added MDNs and charge an arbitrage for the minutes of usage.</p> <p>CaaS operators ensure that pulsing on the BSO lines is increased exponentially, while at the same time ensuring all CDRs are tracked both the BSOs as well as CaaS operators. All the regulatory hygiene checks to prevent the possible TOLL BYEPASS and NUMBER MASKING can be enforced.</p> <p>As and when PSTN and IP network integration is granted by the regulation, (as per the other consultation process already in progress) all these CaaS providers may be allowed to integrate these networks at their platform end to evolve innovative service offerings under prior information to and approval of the regulator.</p>
10	<p>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</p>	<p>Answer to Q9 is negative. Hence the service area limitation does not apply to these CaaS operators. They may be allowed operate globally.</p>

	services? Please provide detailed justification?	
11	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?	As suggested already, these value added services may not be made a part of the unified licensing regime.
12	Whether there should be any requirement for Minimum Net worth and Minimum Equity for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?	Regulator may decide the same. However keeping in view the spirit of Start-up India, many entrepreneurs should be encouraged to start-up; these financial obligations may kindly be fixed in such a way that they will not deter the spirit of promoting the entrepreneurship and to encourage Start-up India and make in India.
13	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?	In the light of the emerging tax regime of GST, any form of a separate levy or revenue share from regulators are not desirable to prevent the end price points to get scaled up to factor all these additional input costs, and finally remain non business viable. It may be detrimental to the very Cloud Telephony sector.
14	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?	Answer to Q13 is negative.
15	What should be Performance Bank Guarantee, Financial Bank Guarantee and Application Processing Fee for Voice Mail/Audiotex/Unified	As answered in to Q 12 above, these financial obligations may be toned down to the extent possible by the regulators to encourage the spirit of entrepreneurship under make in India and start-up India initiatives of our honorable Prime Minister and our Telecom Minister, Government of India , and to foster competition in the Market with more players competing to offer the best offerings and competitive price points.. State

	Messaging Services authorisation under Unified Licence?		exchequer gains through the GST anyways.
16	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?		The CaaS operator registration may be given for an initial period of 20 years and may be renewed periodically thereafter.
17	What should be the terms and conditions for the migration of the existing Voice Mail/Audiotex/Unified Messaging Services licensees to Unified Licence?		Let all existing players be required to register under the new CaaS operator registration with DOT.
18	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?		Let all players in this space migrate to one single CaaS operator registration to maintain simplicity and uniformity to all players in this space.
19	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?		As answered in to Q 12 above, these financial obligations may be toned down to the extent possible by the regulators to encourage the spirit of enterprise and to foster competition in the marker with more players competing to offer the best offerings and competitive price points. State exchequer gains through the GST anyways.
20	Please give your comments on any related matter, not covered above		There is a need to recognize the Cloud Communications providers and hosted Telephony Service providers, who are anyways offering their services supporting millions of SMEs already. These Cloud Telephony players are having the potential to augment employment opportunities in lot many rural and backwards areas, where in local language processes can be outsourced to those areas with almost no high end infrastructure.

		<p>By recognizing them and bringing them under a regulatory purview all confusion in this area can be eliminated totally.</p> <p>We further suggest that the regulatory authorities may kindly examine the services based operator framework evolved by Singapore Government in this regard. Details of the same as per the below URL: “https://www.ida.gov.sg/Policies-and-Regulations/Industry-and-Licensees/Licensing/ Framework-and-Guidelines/Services-Based-Operator-Licence”</p>
--	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------