

Spectranet's response on consultation paper for "Issues related to Internet Telephony" dated 12th May 2008.

Our comments on the above Consultation paper are:

The introduction of IP technology into the PSTN marks another step in the evolution of telecommunications networks. India is far short of Broadband penetration especially in small cities / remote and rural areas. Unrestricted Internet Telephony could be one application which can boost the broadband penetration by providing an economical via media for the citizens to call within as well as outside India, hence may help in serving the very purpose of Government of India i.e. widespread penetration of Internet in india. Security and Monitoring are becoming serious issues in light of the National Security which is paramount for every service provider, it is high time for government to consider central monitoring by interconnecting various networks. It will meet the security concern by monitoring all the networks at central locations as well convenience for the masses to use PC/device to making a call.

Whether Internet service provider should be permitted Internet Telephony services to PSTN/PLMN within India? If yes, what are the regulatory impediments? How such regulatory impediments can be addressed?

ISPs should be allowed to interconnect for wider connectivity and benefit for the masses. Hence, Government should adopt a light regulatory approach as accepted by most of the countries, keeping in view the growth of broadband and benefits of end users. Most of the services offered through Internet generate revenue to the government, incumbents as well as other PSTN/PLMN Operators.

Whether allowing ISPs to provide Internet Telephony to PSTN/ PLMN within country will raise issues of non-level playing field? If so, how can they be addressed within present regulatory regime?

No, this issues should not arise, ISPs basically re-sell services provided by UASL/NLD/ILD Operators. It is worth mentioning here that ISPs are largely dependent on the NLD/ILD/UASL for most resources for which they pay for. A big portion of the ISP's revenue goes back to these service providers, primarily the state-owned incumbents.

Further since the Government has already imposed 6% AGR on Internet Telephony so there will be no revenue loss to the government. Access Providers (PSTN & PLMN) will also get termination charges so there will be a win-win situation for ISPs as well as PSTN/PLMN Operators.

Moreover, Government should see the same in light of growth of broadband across the country, bridging the digital divide and benefits to the end consumers.

Voice business opportunity through the world is more inclined towards mobile technology, hence land-line and other dependent voice services like Internet Telephony should not be seen at par with mobile or traditional wire-line technology. The business opportunity, because of the technical and functional advantage is not same between mobile / wireline and Internet Telephony services. As per recent media

news, government is considering removing entry fee and revenue share for wireline connections. The issue of level playing field does not arise in this case as well as for the proposed Internet telephony, as each will have its niche market but together has and will grow the overall market including increased revenue for the Govt.

ISPs would require interconnection with PSTN/PLMN network for Internet telephony calls to PSTN/PLMN. Kindly suggest Model/ architecture/ Point of Interconnection between ISPs and PSTN/PLMN?

The suggested Model/ architecture/ Point of Interconnection between ISPs and PSTN/PLMN may be like:

Interconnection should be required at circle level. ISP should be allowed to carry the traffic over Internet or through dedicated links between their POPs and could handover the call to the PSTN/PLMN interconnection partner at a desired location. TRAI should ensure that ISPs should not deny interconnection by UASL/NLD/ILD operators and at reasonable cost.

What should be the numbering scheme for the Internet telephony provider keeping in view the limited E.164 number availability and likely migration towards Next Generation Networks?

Regarding numbering scheme for the Internet telephony, the ISPs are the re-seller of UASL/NLD/ILDs and will be happy to carry on with the numbers of Mobile/ PSTN Operators or Govt. may opt for 3-4 digits numbering systems for Internet Telephony, however, The Internet Telephony numbers should be operators specific as Internet does not know any boundary.

Is it desirable to mandate Emergency number dialing facilities to access emergency numbers using internet telephony if ISPs are permitted to provide Internet telephony to PSTN/PLMN within country? If so, Should option of implementing such emergency Number dialing scheme be left to ISPs providing Internet telephony?

The facilities to access emergency numbers using internet telephony, the ISPs shall make available location base Emergency Numbers subject to technical feasibility. In case if a service provider is not offering the same, the information should be provided to the customers in advance.

Is there any concern and limitation to facilitate lawful interception and monitoring while providing Internet telephony within country? What will you suggest for effective monitoring of IP packets while encouraging Internet telephony?

The concern and limitation to facilitate lawful interception and monitoring while providing Internet telephony within country we fully appreciate the government concern on national security and fully committed to wards this aspect. Monitoring of calls won't be an issue for all calls that are landing on to a PSTN/PLMN service

provider. As reiterated earlier also in our view the lawful interception and monitoring Internet telephony calls should also be done at gateway level / central monitoring.

Is there a need to regulate and mandate interoperability between IP networks and traditional TDM networks while permitting Internet telephony to PSTN/PLMN within country through ISPs? How standardization gap can be reduced to ensure seamless implementation of future services and applications? Please give your suggestions with justifications.

The regulation of interoperability between IP networks and traditional TDM networks while permitting Internet telephony to PSTN/PLMN within country through ISPs should left to be self monitored by the ISP's itself, However, same can be review by the competent authority at a later stage.

Is there a need to mandate QoS to ISPs providing Internet telephony to PSTN/PLMN within country? Please give your suggestions with justifications.

Further to mandate QoS to ISPs providing Internet telephony to PSTN/PLMN within country in our view it should be made as an option to the operator and let the market forces decide either way, In case the operator options the service, the same should be stated in their plan to the customers that it is an Internet Telephony call.

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