

Telecom Collaboration Services Pvt.Ltd.(TCSPL) Views on VMS/ Audiotex/ UMS Consultation

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?

TCSPL: No.

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?

TCSPL: Not applicable.

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?

TCSPL: No separate standalone license be needed for Audiotex Services for governmental and private service agencies as defined under Para 2.17.

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?

TCSPL: Not applicable.

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?

TCSPL: Yes. Consultation paper highlighted that audiotex is a generic term and globally there are differing views on services scope. Considering the advancement in conferencing and unified collaboration technologies in the past 20 years, it is appropriate to update current Audiotex license scope by defining a new standalone conferencing service license and eliminate potential regulatory compliance ambiguities.

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

TCSPL: The specifications should be in line with global standards like ITU-T. Competent agency like TEC should analyse the current & future conference technologies, global standards and lay down the technical specifications. Keeping with global trend and business customer demand, the license should cover unified collaboration as a scope wherein audio conference, web conference (e.g. document sharing) and video conference services using either SIP or TDM or such converged technologies be permitted. Such services should always be subject to compliance of prevailing DoT regulation for PSTN and Internet Telephony (e.g. PSTN and Internet Telephony are not allowed to interconnect).

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?

TCSPL: No.

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?

TCSPL: Not applicable.

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?

TCSPL: Yes. For uniformity amongst market players, ensuring level playing field with existing telcos and eliminate regulatory ambiguity for innovative new-age cloud based telephony services; Voice Mail/Audiotex/Unified Messaging Service should be covered as part of Unified License or under VNO (Virtual Network Operator) as one of the services requiring authorisation.

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?

TCSPL: Yes. Services Area definition as used in case of ISP and/ or Unified License should be used for bringing uniformity.

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?

TCSPL: Entry fees for current Voice Mail/Audiotex/Unified Messaging Services should be Rs.1 Lac per Service Area. There should be some additional eligibility entry criteria to distinguish conferencing deployed in typical enterprise domain vis-à-vis conferencing deployed under Audiotex regime e.g. Audiotex players should have minimum 500 or more ports on audio conferencing bridge.

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?

TCSPL: Minimum Net worth of Rs.1 Cr and Minimum Equity of Rs.1 Cr be applicable 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.

TCSPL: Yes. To eliminate the license fee arbitrage and loss to exchequer, the license fee while offering services under Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence and existing UASL/ CMTS/ Basic Services/ NLD/ ILD/ ISP licenses be the same which is currently 8% of AGR or as prescribed in regulation from time to time.

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?

TCSPL: Voice Mail/Audiotex/Unified Messaging Services operators pay for access PSTN trunk rental, per minute usage charges for inbound toll free, Dial-out local/ STD etc. Audiotex operators procure from foreign operators/ ILDOs the International Toll Free numbers and carriage of calls into India PSTN via licensed ILDOs. Access providers & ILDOs already pay License fees on such services provided to Voice Mail/Audiotex/Unified Messaging Services operators. Hence it is important to define AGR (Adjusted Gross Revenue) which avoids double counting of license fees.

AGR for Voice Mail/Audiotex/Unified Messaging Services operators = Total Revenue from applicable telecom services – Access fees paid to Indian Access providers for access services in India – Interconnect fees paid to foreign operators for International Toll Free service.

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?

TCSPL: As is currently the case for VMS/ Audiotex/ UMS providers; Performance Bank Guarantee should be Rs.3 Lac, No Financial Bank Guarantee be applicable and nominal Application Processing Fee should be Rs.20,000.

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?

TCSPL: Yes, duration of the license should be 20 years as in other license authorisation under Unified Licence.

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

TCSPL: Existing players as approved & listed with DoT on a certain cut-off date should be migrated to Unified License automatically, without any extra cost and procedure.

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?

TCSPL: For reasons of uniformity in regulation, it should be mandatory to migrate existing players to 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?

TCSPL: Not applicable. To avoid license fee arbitrage, all existing Voice Mail/Audiotex/Unified Messaging Services licensees should be forced to migrate under Unified Licence regime and be charged uniform license fees from cut off date.

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

TCSPL: After migrating to Unified License regime, Voice Mail/Audiotex/Unified Messaging Services operators with multiple service areas authorisations be allowed to bridge the calls in respective service areas and link such multiple bridges using authorised access provider networks who in turn carry such linking calls via authorised NLD networks. Since there will not be any loss of license fees and loss to exchequer, such multi-location bridging be permitted.

After migrating to Unified License regime, Audio bridge or IVR or associated network equipment connected to authorised access provider with a dial-in number should be accessible on STD basis from outside a specific Service Area where the bridge is installed ; in line with current provisions of VMS/Audiotex/ UMS license.

After migrating to Unified License regime, VMS/Audiotex/ UMS license operators should be allowed to sell inbound local or toll free number procured from authorised access providers alongwith its various value added services like IVR or enhanced call routing services (e.g. routing the inbound call from Tamil speaking customer to a Tamil speaking customer support representative). Such call termination should be carried out using authorised access providers or MPLS data network as applicable in case of OSP (Other Services Provider) license holder complying with respective DoT OSP regulation.

