



VIL/LT/2015-16/538
21-Dec-2015

Shri Arvind Kumar
Advisor (NSL)

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg, Old Minto Road,
New Delhi - 110 002

Sub: Vodafone's Counter Comments - Consultation Note on IP Based Interconnection dated 27.11.2015
Ref: (i) Our letter dated 04.12.2015 seeking a copy of DoT letter dated 10.11.2015
(ii) TRAI letter dated 09.12.2015 sharing a copy of DoT letter dated 10.11.2015 and extending timeline for submission of comments
(iii) Vodafone's comments vide letter no VIL/LT/2015-16/507 dated 14.12.2015

Dear Sir,

In furtherance and without prejudice to our submissions contained in aforesaid response dated 14.12.2015 and in rejoinder to the views of some stakeholders as available on the TRAI's website, we would like to furnish the following counter-comments:

1. At the outset, we would like to emphasize that the limited issue for consideration is interconnection between two IP-switched networks for exchange of voice & SMS traffic of PSN/PLMN only. Suggestion to remove the existing prohibition on inter-connectivity between PSTN networks on one hand and CUG, VPN, Public IP networks on the other is outside the scope and purview of this exercise. Any such issue has to be the subject of a separate detailed consultation taking into account factors such as licensing, entry fee, license fee, roll-out and other related obligations and level playing field considerations.
2. It is reiterated that the existing Interconnection Agreements, based on mutual consent, cannot be unsettled. Any amendment to these agreements can only be where both Parties mutually agree to the change. Thus, IP based interconnection should not be mandated and is best left to bilateral agreements between TSPs. We do not support the proposal for phased migration to a mandatory IP Interconnection regime wherein if a party demands IP Interconnection, it must be provided and cost of conversion from TDM to IP shall have to be borne by the TSP operating a TDM network. At the cost of repetition:
 - circuit switched 2G networks constitute 75-85% of the total sites/network and are likely to remain at the core of voice services at least for the next 5-10 years
 - investments made by TSPs on the TDM cannot be disregarded before their useful life and unless the costs are amortised

Vodafone India Limited (CIN-U32200MH1992PLC119108)

7th Floor, DLF Centre, Sansad Marg,
New Delhi - 110 001, India. T +91 11 7171 0766, F +91 11 7171 0767
Regd. Off.: Peninsula Corporate Park, Ganpatrao Kadam Marg, Lower Parel, Mumbai - 400 013, India
T +91 22 7171 5000, F +91 22 2496 3645, Website: www.vodafone.in

- purchase of new equipment such as routers, SBCs, LAN switches, gigabit ethernet equipped transport boxes, apart from IP addresses, security software, etc. entailed in IP interconnection pose a huge financial cost, which cannot be saddled on TSPs against their intent in a technology agnostic regime

We trust the above will merit your kind consideration.

Yours sincerely

For **Vodafone India Limited**



Manish Gupta

General Manager –Regulatory Affairs

+91-9811919500