



To,

Pr. Advisor (NSL)  
Telecom Regulatory Authority of India  
Mahanagar Door Sanchar Bhawan  
Jawahar Lal Nehru Marg, (Minto Road)  
New Delhi-110002

Kind Attention: Sh. U. K. Srivastava

No: Regln/1-33/2014/9697

dated: 24-01-2020

Sir,

**Sub:** TRAI's draft recommendations on "Network Testing before Commercial launch of services for Wire line Access Services"

Kindly refer to the TRAI's draft recommendations on "Network Testing before Commercial launch of services for Wire line Access Services".

In this context, the BSNL's point wise reply is as below:

**Q1.** The Authority recommends that a TSP should be allowed to enrol test subscribers in testing phase to carry out the network testing before commercial launch of its services.

**BSNL's Response:** Yes agreed, however the POI connectivity locations & number of POI, should be clearly specified in guidelines before testing.

**Q2.** The Authority recommends that: -

- a. There should be no restriction on the time-limit, if the network testing is conducted using wireline telephone test connections given to employees and business partners for test purpose only.
- b. The number of test subscribers that can be enrolled by a TSP in an LSA should be limited to 5% of its installed network capacity for that LSA. The service provider will submit the detailed capacity calculations of the network to DoT and TRAI at least 15 days before commencing enrolment of test subscribers.
- c. There should be a limit of 90 days on the test phase involving test subscribers. However, if the TSP fails to conclude network testing due to valid reasons, it may make a representation to the Licensor, seeking additional time for network testing giving detailed justification, which may be decided by the Licensor on case to case basis. The requisite norms to be followed for extension of timeline for network testing may be formulated by the licensor. The total time period for network testing provided to the TSP shall not exceed 180 days.

**BSNL's Response:**

- 2.a. Yes, agreed
- 2.b. Yes, agreed
- 2.c. Yes, agreed

**Q3.** The Authority recommends that if a TSP wants to enrol test subscribers in its network before the commercial launch of services for testing purpose:

- a. It should give prior intimation to DoT and TRAI at least 15 days before commencing enrolment of test subscribers.
- b. All licensing provisions related to the security and privacy such as ensuring adequate verification of each and every customer before enrolling him as a subscriber, protection and privacy of communication, maintaining Call Detail Record (CDR)/IP Detail Record (IPDR), Confidentiality of Information, Lawful interception & monitoring etc. must be complied with by the licensee.
- c. During test phase, the licensee should be bound to submit test subscriber related statistics and their usage, and other information as per prevailing instructions of DoT/TRAI.

**BSNL's Response:**

- 3.a. Yes, agreed
- 3.b. Yes, agreed
- 3.c. Yes, agreed

**Q4.** The Authority recommends that if a TSP wants to enrol test subscribers for the testing of its network, it should transparently give the following information to the test subscribers at the time of their enrolment:

- a. During test phase, TSP is not mandated to adhere to specified level of QoS. Therefore, there may be suboptimal level of network performance.
- b. The scope of services during the test period.
- c. There won't be any charge (fixed charge or usage based charge) during the test phase. CPE (Customer Premises Equipment) is also provided free of charge.
- d. Likely date of commercial launch.

**BSNL's Response:**

- 4.a. Yes, agreed
- 4.b. Yes, agreed
- 4.c. Yes, agreed
- 4.d. Yes, agreed

  
AGM (Regin-II)