



RSM/COAI/2020/018

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**Subject: COAI Response to the TRAI draft recommendations on 'Network Testing before Commercial Launch of Services for Wireline Access Services'**

Dear Sir,

This is with reference to the TRAI draft recommendations on 'Network Testing before Commercial Launch of Services for Wireline Access Services' released on December 31, 2019.

In this regard, please find enclosed COAI response to draft recommendations.

We hope that our submission will merit your kind consideration and support.

With Regards,

Yours faithfully,

**Rajan S. Mathews**  
**Director General**



## Response to the TRAI draft Recommendations on Network Testing before Commercial Launch of Services for Wireline Access Services released on December 31, 2019

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At the outset, COAI welcomes the opportunity to comment on the TRAI draft Recommendations on Network Testing before Commercial Launch of Services for Wireline Access Services.

Our inputs on the draft Recommendations are as given below:

**TRAI draft Recommendation 2.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.**

### COAI Comments:

1. The definition of the subscriber under license does not cover a ‘test’ subscriber.

*“**SUBSCRIBER** means any person or legal entity, which subscribes to / avails of the service from the Licensee. In this License, the words ‘Customer’ and ‘Subscriber’ have been used interchangeably.”*

*“**SERVICE** means collection, carriage, transmission and delivery of messages over Licensee’s network in Service Area as per authorization under this License”.*

2. As per the license condition, the licensee shall commence the Service on a commercial basis only post subscriber registration.
3. Over and above, the fact that the licensing conditions do not allow the enrollment of the subscriber at the time of testing, the DoT letter dated 2005 also states that only test cards (test equipment) are given free of cost to Business Partners, to check the Quality of Service and hence there is no concept of “subscriber” in the testing phase.
4. Further, for the testing purposes especially for load testing situations, various simulation tools are available and there is no need to do testing on the live subscribers/users. Testing should be restricted within its own network of the concerned Licensee /TSP. In case of any load /stress testing the same can be done by using a mechanism such as loopback testing on own network instead of terminating test traffic on other TSPs. However, if necessary, testing with the other networks i.e. other TSPs, the same should be carried out using the wireline test connections given to business partners and employees only.

5. Considering above, **we would like to submit that there should not be any enrollment of the subscriber in the Testing Phase.** The functionality and limited duration of the wireline test connections given to Business partners and employees is a well-understood industry practice which is also being regularly reported to the DoT.

**TRAI draft Recommendations 2 c): There should be a limit of 90 days on the test phase involving test subscribers.**

**COAI Comments:**

1. As mentioned above, the TSP should not be allowed to enroll subscribers during the testing phase. TSP must start offering services on a commercial basis in case they want to enroll the subscriber. In view of such restriction, there should be a defined timeline for the testing phase. Thus, in any event, there is no case for a continuation of testing, post TSP starts enrolling subscribers.

**TRAI draft Recommendations 4 a): During test phase, TSP is not mandated to adhere to specified level of QoS.**

**COAI Comments:**

1. The reference to QoS provisions under license is not referable to test subscribers

***Quality of Service:*** *The LICENSEE shall ensure the Quality of Service (QoS) as may be prescribed by the Licensor or TRAI. The LICENSEE shall operate and maintain the licensed Network conforming to Quality of Service standards subject to such other directions as Licensor / TRAI may give from time to time. The LICENSEE shall adhere to such QoS standard and provide timely information as required therein. Failure on part of LICENSEE to adhere to the Quality of Service stipulations by TRAI/Licensor is liable to be treated as breach of terms and conditions of License. (Clause 29.1)*

2. As per the TRAI QoS Regulations, QoS norms are applicable to subscribers who have subscribed to the services of the licensee. Thus, we are of the view that it cannot be a case that test subscribers are permitted, but QoS is not guaranteed to them.
3. Therefore, we would once again like to submit that the TSP should not be allowed to enroll subscribers during the Network Testing Phase before Commercial Launch of Services for Wireline Access Services.

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