

**CONSUMER PROTECTION ASSOCIATION
HIMMATNAGAR
DIST. : SABARKANTHA
GUJARAT**



Comments on

**Consultation Paper on review of the Regulatory Framework for
Interconnection**

Introduction :

The market for voice call has seen considerable change over the past two decades. Use and pricing of mobile and fixed line voice services have converged, prices have fallen and most mobile and fixed telephony voice calls are now included in call allowances. Technological developments have allowed alternatives to telephony to emerge, such as OTT, VoIP and messaging. The wide spread take up of these alternatives has contributed to declining use of fixed line telephony.

The Indian Telecom network can undergo substantial change in the coming years, if the service providers that run them upgrade their technology. The service providers should gradually move their landline customers from the country's traditional telephone network – the "Public

switched telephone network " (PSTN) to newer digital technology known as " Voice over Internet Protocol " (VoIP).

Now fixed telecoms networks are undergoing a significant technology change as service providers transfer telephone services from legacy circuit switched network to IP network. This means that the way fixed telephone services are delivered will change.

During the next few years these broadband based call services will become more common, as the PSTN is reaching the end of its life and becoming increasingly difficult and costly to maintain.

This change is not unique, a number of countries around the world have completed, or are in the process of, a similar transition.

This change can offer potential benefits to consumers, such as to help identify nuisance calls, clearer phone calls and also will help to ensure the Indian landline telephone services fit for the future. But we strongly feel that consumer should experience minimal disruption protected from harm, and TRAI should regulate telephone services to meet consumers' changing expectations and needs. At the same time TRAI should ensure consumers are protected from harm.

The aims of the TRAI should be :

- (i) To promote competition between service providers, recognizing the changing market, where OTT, Social Media and messaging platform offer alternative to traditional phone calls.

- (ii) To promote confidence in Phone calls and services by tackling nuisance and scam calls and addressing pricing practices that lead to unexpected or unreasonable bills.
- (iii) Protect people from harm by making sure they continue to have access to important services.
- (iv) Consumer and business benefit and better quality phone calls from an efficient and innovative market.

Q.1 Whether the flexibility be provided to interconnecting operators for interconnecting PSTN to PSTN networks at SDCC/ Level II TAX (SSA)/ Level I TAX (LSA) levels as per their mutual agreements? If no, then justify your comments with reasons.

Comments :

Yes. With close supervision of TRAI.

Following points should be considered :

1. There should be :
 - (i) Transparency
 - (ii) Non Discrimination and
 - (iii) Cost orientation.
2. Following minimum interconnection principles should be followed :
 - (i) General principles including the duty of inter connection with other licensed operators and the principles of non discrimination.

- (ii) Principles relating to interconnection charging.
- (iii) The regulation proposed approach and deadlines with respect to interconnection negotiations.
- (iv) Technical issues related to Interconnection.
- (v) Promotion of customer/consumer interest and provision/protection of information.

3. Following interconnection issues may be considered :

(A) Commercial :

- (a) What is the scope of Interconnection service demand and provided ?
- (b) What are the prices at which interconnection services are provided ?
- (c) What is the process for resolving disputes between parties ?
- (d) What are the general terms and conditions for interconnection?
- (e) What are the appropriate quality of service standards ?
- (f) When does billing takes place ?
- (g) What billing information is exchanged ?

(B) Technical :

- (a) What is the appropriate location and number of POI ?
- (b) What is the network level at which interconnection takes place ?
- (c) What are the applicable interoperability standards?
- (d) When is new interconnection capacity required ?
- (e) What are appropriate arrangement for co-location ?

4. Following structure of interconnection agreements may be consider :
 1. Definition and Interpretation
 2. Scope of Agreement
 3. Points of interconnection and interconnection services.
 4. Traffic measurement, Routing and Access services.
 5. Network and facility changes.
 6. Infrastructure sharing and co-location.
 7. Billing and settlement
 8. Universal service obligations.
 9. Quality of service/performance and trouble report.
 10. Provision of information.
 11. Ancillary services.
 12. Dispute resolution.
 13. Network Protection.
 14. Liability and Indemnity.
 15. Charges and charging principles
 16. Technical manuals
 17. Periodic Testing
 18. Safe Operation and Maintenance
 19. periodical access by TRAI etc..

N.B. : 1. It is important to ensure compability of terminology to local environment when adapting interconnection agreements from other countries.

2. Different types of interconnection agreements have different purposes. (Ex. Two local network, Local to long distance/international, fixed to fixed, fixed to mobile etc..)
5. Phone users must receive equivalent protections however their Landline service is delivered.
6. TRAI should regulate prices for calls between network :

TRAI should cap those charges only where the call is handed over using traditional switched technology, regardless of where and how they are connected between networks. As when service providers move to IP, and use of legacy switched technology diminishes, BT may have the ability and incentive to overcharge for connecting calls. At that time TRAI may need to reconsider where regulated price apply.
7. Regulation of Interconnection Circuits :

In future, there will be need to consider whether regulation is needed during migration.
8. Ensuring all calls are connected :

TRAI should ensure that all calls should be connected between any service providers.
9. Technical standard :

Common technical standard may be needed to ensure call quality.
10. Call termination charges :

TRAI should impose caps on call termination charges and periodically review on it.

11. Secure standardization in interconnection to maintain service reliability and quality.
12. Following policy issues may arise, such as :
 - (i) Applicability of fixed call termination charges
 - (ii) Setting the standardization needed for interconnection to maintain reliability and call quality.
 - (iii) The future of BT's End to End connectivity condition,

Q.2 In case of no mutual agreement between the operators, what should be the level of interconnection for interconnecting PSTN to PSTN networks be mandated in the Regulations.

Comments :

Mentioned above.

Q3. Any other issue you would like to bring to the attention of the Authority.

Comments :

No.

(Dr. Kashyapnath)
President