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3<sup>rd</sup> April 2024

To,

**Shri Akhilesh Kumar Trivedi,**  
Advisor (Networks, Spectrum and Licensing),  
TRAI  
New Delhi

Sir,

**Subject:- Consultation Paper on Connectivity to Access Service VNOs From More Than one NSO**

We are a registered CAG of TRAI.

We are pleased to forward our **counter comments** on some of the issues mentioned in the above consultation paper.

Thanking you,  
Yours Sincerely

GOPAL RATNAM V  
Secretary  
Consumer Care Society  
M:8618226492

**Counter Comments**  
**on**  
**Consultation Paper on**  
**Connectivity to Access Service VNOs From More Than one NSO**

**Among the objectives of TRAI is to protect the interest of consumers and also to promote and ensure orderly growth of the telecom sector. These objectives imply that the Consumers have multiple providers of quality telecom services for their current and future needs at a reasonable/competitive rates.** However, currently with only a few Network Service Operators/Telecom Service Providers providing services, Consumers/Subscribers have limited choice of quality telecom services. Further, the quality of services of these NSOs/TSPs are quite erratic and unreliable. This gives rise to constant complaints by subscribers which are, in most cases, not addressed. This results in consumers having no access to the network for many a times, even in a day. This affects the quality of life and also the quality of working, if the consumer is working from home (WFH). Further, even when the subscriber uses MNP to change the TSP, the quality of services over a period of time is not assured. So the consumer is always forced to compromise on the services provided. **In these circumstances, consumers would welcome any measure that would provide them with more choice and assure them of the availability of services and the reliability of the quality of service.**

We, as a Consumer Organisation, would welcome any policy measures that improves the quality and reliability of services. **We strongly believe that under the present circumstances, the connectivity of Access Service VNOs from multiple NSOs would result in a more favourable environment for consumers, and as such we would welcome a policy change.** However, perusing the comments made by the NSOs which object to multiple parenting by VNOs on various grounds of Privacy and Security, Technical and Regulatory issues, we opine that TRAI should conduct a detailed examination of the implication of such a policy change of permitting multi-parenting.

Firstly, we provide counter comments to the general comments provided by the various NSOs/TSPs.

1. VIL in their comments mention that VNOs will have significant arbitrage and provide enhanced services to end enterprise customers. RJIL mention that there can a scenario of shifting loyalties and possibility of anti-competitive practices. **We believe that if VNO are able to switch between NSOs and offer enhanced services to customers, it should be welcome. The regulator should promote a competitive market at all levels of the value chain so that efficient use of resources, innovation and better customer value is achieved.**

2. NSOs (RJIL) further mention that monitoring, regulation, enforcement of of multiparenting regime should be onerous. Further, they (VIL) impute that VNOs do not have the capabilities for lawful interception, privacy and security, emergency services, unsolicited commercial communications, customer verification, quality of service, etc. **We believe these issues should be studied further by the regulator but they should NOT serve to hinder the policy change if the end consumers benefit through better quality of service at a fair price.**

Now, we provide our counter comments to the comments provided by various stakeholders to specific questions raised in the consultation paper.

Q1. In your view, what is the maximum number of Network Service Operators (NSOs) from whom a UL (VNO) licensee holding Access Service Authorization should be permitted to take connectivity in a licensed service area (LSA) for providing wireline access service?

Kindly provide a detailed response with justification.

**VNOs should have the freedom to take connectivity from any number of NSOs for providing wireline access service as we believe that with a competitive market at inputs level for VNOs, it would lead to a better price at the retailer/consumer level and also better service levels.**

Q2. In case your response to the Q1 is a number greater than one, what should be the associated terms and conditions for permitting such connectivity? Kindly provide a detailed response with justification.

**As mentioned earlier, the various critical issues to consumers of Privacy, Security, Customer Service, Consumer Grievance Handling should not be compromised and the regulator TRAI should formulate adequate regulations to ensure that.**

Q3. Whether a UL (VNO) licensee holding Access Service Authorization in an LSA should be permitted to take connectivity from one NSO for wireless access service and other NSO(s) for wireline access service in the LSA? Kindly provide a detailed response with justification.

**As elaborated in the introduction and also in the response to question 1, VNOs should have the freedom to take connectivity from any number of NSOs for providing wireless access service as we believe that, with a competitive market at input level for VNOs, would lead to a better price at the retailer/consumer level and also better service quality.**

Q4. In case your response to the Q3 is in the affirmative, what should be the associated terms and conditions for permitting such connectivity?

Kindly provide a detailed response with justification.

**Our response is identical to Q2. The various issues of concern to consumers like that of Privacy, Security, Customer Service, Consumer Grievance Handling should not be compromised and the regulator TRAI should formulate adequate regulations to ensure that.**

Q5. Whether there are any other relevant issues or suggestions related to the parenting of licensees holding Access Service Authorization under UL (VNO)? Please provide a detailed response with justification.

**No Comments.**

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