

Dated: 13 06 2008

The Advisor (CN)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhavan,
Jawaharlal Nehru Marg, Old Minto Road
New Delhi - 110 002
(Tel No. 011-23217914 Fax No. 011-23211998)

Subject: Consultation Paper on Issues related to Internet telephony

Reference: TRAI's Consultation Paper No. 11/2008, Dated 12.05.2008.

Dear Sir,

We are an ISP licensee of class "A" category and providing Internet service all over the country, under our modified ISP license No. 820-377/2002-LR, dated 09.04.2002. We are an registered ISP with TRAI under Registration No. S/IS/AI/000325.

We are enclosing herewith our response on the above Consultation paper, with the hope that these inputs would be useful.

Thanking you,
Yours sincerely

(Raj Kumar Sharma)
General Manager (Projects & Commercial)

Encl : As above

**RESPONSE TO TRAI CONSULTATION PAPER ON ISSUES RELATED
TO INTERNET TELEPHONY – MAY 2008**

CHAPTER 4

Issues for consultation

Q. 4.1 Whether Internet service provider should be permitted Internet Telephony services to PSTN/PLMN within India? If yes, what are the regulatory impediments? How such regulatory impediments can be addressed?

HCL Infinet's Comments: Yes, ISPs should be allowed to interconnect for wider connectivity and benefit for the masses. As the ISPs having no long distance media of their own, are dependent on the NLD/ILD/UASL operators for resources as such over 85% of the ISP revenue goes back to these service providers. Also most of the services offered through Internet, create an indirect income to the government, and that's the precedence in most of the countries. Therefore Government should adopt a light regulatory approach as accepted by most of the countries, keeping in view the growth of broadband and benefits of end users.

Q. 4.2 Whether allowing ISPs to provide Internet Telephony to PSTN/ PLMN within country will raise issues of non-level playing field? If so, how can they be addressed within present regulatory regime?

HCL Infinet's Comments: Now a days Voice business opportunity is more inclined towards mobile technology, across the world and also the business opportunity, because of the technical and functional advantage is not the same between mobile / wireline and Internet Telephony services, hence land-line and other dependent voice services like Internet Telephony should not be seen at par with mobile or traditional wireline technology. Moreover, as per recent media news, government is considering removing entry fee and revenue share for wireline connections. The issue of level playing field does not arise in this case as well as for the proposed Internet telephony, as each will have its niche market but together has and will grow the overall market including increased revenue for the government. ISPs are basically the re-seller of the services provided by UASL/NLD/ILD Operators. More than 85% of the ISP revenue goes back to these service providers primarily the state-owned incumbents stated as in Para 4.1 above. Moreover, Government should see the same in light of growth of broadband across the country, bridging the digital divide and benefits to the end consumers.

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Q. 4.3 ISPs would require interconnection with PSTN/PLMN network for Internet telephony calls to PSTN/PLMN. Kindly suggest Model/ architecture/ Point of Interconnection between ISPs and PSTN/PLMN?

HCL Infinet's Comments: Interconnection should be required at circle level. ISP should be allowed to carry the traffic over Internet or through dedicated links between their POPs and could handover the call to the PSTN/PLMN interconnection partner at a desired location. TRAI should ensure that ISPs should not be denied interconnection by UASL/NLD/ILD operators and at reasonable cost.

Q. 4.4 Please give your comments on any changes that would be required in the existing IUC regime to enable growth of Internet telephony? Give your suggestions with justification to provide affordable services to common masses?

HCL Infinet's Comments: Technically ISPs could be restricted only to PRI interconnect. Hence, the IUC charges could be lower than the other telco services.

Government should ensure that Interconnection should not be more than one location with all the operators.

4.5 What should be the numbering scheme for the Internet telephony provider keeping in view the limited E.164 number availability and likely migration towards Next Generation Networks?

HCL Infinet's Comments: The number of Internet Telephony links traditionally hasn't overtaken mobile connections, in any part of the world. The number of Internet Telephony connections would not be much comparing to mobile industry. Hence, the numbering plan could be limited within a numbering plan of a land line number or a mobile number.

The ISPs are the re-seller of UASL/NLD/ILDs, and will be happy to carry on with the numbers of Mobile/ PSTN Operators. However to differentiate the Internet telephony calls from PSTN/PLMN, Government may consider 3 digit service providers code and 7 digit code/ number to consumers.

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Q. 4.6 UASL and CMTS operators are allocated number resources and permitted to provide Internet telephony including use of IP devices/Adopters. Whether such devices should be allocated E.164 number resource to receive incoming calls also? If so, whether such number resources should be discretely identifiable across all operators and different than what is allocated to UASL and CMTS to provide fixed and mobile services? Give your suggestions with justifications?

HCL Infinet's Comments: Not necessary to be discretely identifiable. Yes, the devices are to be allocated with a E.164 numbers for incoming calls, as an user, he/she won't be interested in using any other format to make a call these days. Hence an E.164 number should be allocated per IP device. However, service providers can offer two differentiated services – with incoming facility and without incoming facility. The number resources can be used better by this.

Moreover, as mentioned above ISPs will be too happy to take numbers from PSTN/PLMN operators and pass it on consumers. However, to differentiate the Internet telephony calls from PSTN/PLMN Government may consider 3 digit service providers code and seven digit code/ number to consumers.

Q. 4.7 If ISPs are allowed to receive Internet telephony calls on IP devices/ Adopters, what numbering resources should they be allocated?

HCL Infinet's Comments: Same as mentioned in Para 4.6 above.

Q. 4.8 Is it desirable to mandate Emergency number dialing facilities to access emergency numbers using internet telephony if ISPs are permitted to provide Internet telephony to PSTN/PLMN within country? If so, Should option of implementing such emergency Number dialing scheme be left to ISPs providing Internet telephony?

HCL Infinet's Comments: ISPs shall make available location base Emergency numbers subject to technical feasibility. In case if a service provider is not offering the same, the information should be provided to the customers in advance as the practice being adopted by operators world wide.

Q. 4.9 Is there any concern and limitation to facilitate lawful interception and monitoring while providing Internet telephony within country? What will you suggest for effective monitoring of IP packets while encouraging Internet telephony?

HCL Infinet's Comments: We fully appreciate the government concern on national security and fully committed to wards this aspect. Monitoring of calls won't be an issue for all calls that are landing on to a PSTN/PLMN service provider. **We think that lawful interception and monitoring Internet telephony calls should also be done at operators level beside the central monitoring.**

Q. 4.10 Is there a need to regulate and mandate interoperability between IP networks and traditional TDM networks while permitting Internet telephony to PSTN/PLMN within country through ISPs? How standardization gap can be reduced to ensure seamless implementation of future services and applications? Please give your suggestions with justifications.

HCL Infinet's Comments: Initially Government should not regulate. However, at a later stage same can be done on mutual cooperation and agreed terms and conditions amongst the service providers. However, TRAI must ensure that no access / protocol / data incoming or outgoing should be stopped.

Q. 4.11 Is there a need to mandate QoS to ISPs providing Internet telephony to PSTN/PLMN within country? Please give your suggestions with justifications.

HCL Infinet's Comments: QoS could be prescribed to a limited level of MoS, ASR and ADC. However, it shouldn't be mandatory to be same as the other TDM services instead should be made as an option to the operator. In case if the operator is offering a differential service of different quality, the same should announce in advance to the customers.

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