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**Sent:** Friday, April 5, 2024 11:53:01 PM  
**Subject:** Ishan Netsol Counter comments to response by various access providers on Consultation Paper on Connectivity to Access Service VNOs from More than one NSO

Dear Sir,

Ishan Netsol Pvt. Ltd. is a category A ISP and UL VNO Access service provider in Gujarat, and further interested to take more VNO licenses in various other service area. We are submitting counter comments are in response to the response provided by Bharti, Reliance Jio, COAI etc.

It is requested that our counter comments be taken on record and may kindly be considered while taking a view in the matter.

Best Regards

Pramod Salvi  
VP – Engineering  
Ishan Netsol Pvt. Ltd.

## Ishan Netsol Counter comments to response by various access providers on Consultation Paper on Connectivity to Access Service VNOs from More than one NSO

Ishan Netsol is a category A ISP and UL VNO Access service provider in Gujarat, and further interested to take more licenses in various other circles. We are submitting counter comments are in response to the response provided by Bharti, Reliance Jio, COAI etc.

### **Introductory counter Comment**

As per VNO license conditions, all the service authorizations under UL VNO, multi-parenting with NSO is permitted, except in specific access service authorization for wireline and wireless services authorizations.

Allowing the multi-parenting of VNO with multiple NSOs in the LSA shall benefit to get new entrants, it will boost business of VNOs and make their business viable in comparison to current situation. It will also facilitate the expansion of UL VNO access authorization to the enterprise segment, smaller cities, rural areas.

In addition to regulatory restriction, there are market restrictions in place by mutual agreement between NSO and VNO, as there is no regulatory mandate for providing connectivity to the VNOs. The current limitation on multi-parenting doesn't seem to support regulatory neutrality, especially concerning the growth of UL VNO in India. Policies/regulations should be facilitative, aimed at broadening the options for customers and network operators, whether UL VNOs or NSOs, rather than adding extra constraints.

We urge TRAI to recommend for the removal of the existing restrictions on multi-parenting in all the situations as outlined in this 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.

Ishan Netsol `s Counter Comment:- UL VNO Licensee holding Access service authorisation should be permitted to take connectivity in a LSA for providing wireline access service from multiple NSOs for reasons mentioned below

- a. Current limitation of single NSO connectivity, restricts to the services being offered by NSO e.g. if NSO don't have mobility business, don't have spectrum, there is no way UL VNO can provide these services
- b. In cases of offering services as VNO, commercially commercials provided by NSO becomes constraints for the UL VNO licensee, as NSO can offer at discount beyond the commercials agreed with UL VNO and hence UL VNO Access licensee `s business growth shall be restricted.
- c. However there may be stipulation that in any one LDCA or SDCA the VNO access licensee will be allowed to connect with one wireline access service provider NSO, but over the LSA

- it may be allowed to VNO to connect with another NSO.
- d. NSO not having licenses e. g. ILDO, shall have either restriction of options to provide services and also non competing commercials making UL VNO licensee loose deals, as NSOs arrangement with TSP may not be competitive.
  - e. Multiple NSO option with UL VNO licensee shall provide ability to have better / competitive commercials.

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.

Ishan Netsol `s Counter Comment:- In view of UL VNO Licensee with authorisation for taking connectivity from multiple service providers, then the following additional guidelines can be followed by UL VNO Licensee

- a. UL VNO Licensees service delivery platform / PABX instance should be separate for connectivity with each NSO.
- b. Traffic originated / terminated for the specific numbers series received from the NSO, should be routed on the trunks with same NSO network. Inter NSO traffic also to be routed via the NSO with whose number series the calls are originated.
- c. LIM solution of the NSO providing link shall be used, for the traffic carried on the particular NSO's link.
- d. UL VNO Licensee shall in addition have obligation for all other Terms and conditions as per license agreement.
- e. VNO access service licensee should be allowed parenting at the minimum with one wireline and one wireless access service provider at the minimum.
- f. Need to be considered that all wireline access service provider NSOs don't cover all SDCAs of entire LSA. In order to rollout services across the LSA , the VNO Access licensee should be allowed to choose more than one NSOs to complete the rollout.
- g. It is also worth noting that connecting multiple NSOs on a particular EPABX is allowed for UL VNO Access category B, but the same is restricted in case of UL VNO Access Authorization. DOT has not notified any technical, commercial or security issues post amendment in UL VNO Access Category B license. There is also a need to ensure level playing field among the various UL VNO Access service authorizations. Moreover, the license fee is uniform across all authorizations, so there is no revenue loss if the customer is served directly by NSOs or through UL VNOs .
- h. Removal of the restriction on multi parenting for wireline access is necessary for all stakeholders, UL VNO, Customers, NSOs and thereby overall telecom sector

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.

Ishan Netsol `s Counter Comment –

UL (VNO) licensee holding Access Service Authorization in the LSA should be permitted to take connectivity from one NSO for wireless access service and another NSO(s) for wireline access service in the LSA.

UL VNO license cost is charged considering all the services shall be allowed under the license of access authorisation, the license fee is also significant and charged for 10 years period. Hence in case when the NSO doesn't provide services like Wireless access services, UL VNO signed with the NSO will be disadvantaged of providing Wireless Access services to its customers and to provide such services UL VNO licensee authorized for access services in the LSA must be allowed to take connectivity and other resources from another NSO. However, UL VNO Licensee should be also allowed to take wireline and wireless services from Multiple NSOs.

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.

Ishan Netsol 's Counter Comment: - In view of UL VNO Licensee with authorisation for taking connectivity from multiple service providers, then the following additional guidelines can be followed by UL VNO Licensee

1. UL VNO Licensees service delivery platform instance should be separate for connectivity with NSO for Wireline and Wireless services.
2. Traffic originated / terminated for the specific services (wireline / wireless), should be routed on the respective NSO trunks.
3. LIM solution of the NSO providing link shall be used, for the traffic of wireline and wireless services, carried on the particular NSO's link.
4. UL VNO Licensee shall in addition have obligation for all other Terms and conditions as per license agreement.
5. We would like to further submit that multi-parenting may also be permitted to Wireless Access Services

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.

Ishan Netsol 's Counter Comment: - We will humbly submit below mentioned support from the Licensor , authority for their kind consideration to provide better level playing opportunity for UL VNO licensee –

- a. UL VNO License fee rationalization, considering the constraints and revenue observed that UL VNO Licensee is making since the UL VNO license is issued.
- b. Dedicated allocation of E. 164 number series for VNO, so that the dependency on the NSO can be taken away
- c. Allowing the multi parenting for UL VNO Access, it will bring-in global telecom operators wanting to enter Indian market who may currently be hesitant to enter the Indian market due to such restriction. Many of whom may already having operated successfully in the VNO / MVNO model in other countries.