From: < soumen@nixi.in >

To: "Akhilesh Kumar Trivedi"<advmn@trai.gov.in>
Cc: "CEO NIXI"<ceo@nixi.in>, <shubham@nixi.in>

Date: Tue, 19 Nov 2024 18:46:01 +0530

Subject: NIXI's comments on TRAI consultation paper!

Sir,

In response to question number six regarding the NIXI in the TRAI consultation paper published on the website (https://www.trai.gov.in/sites/default/files/CP_22102024.pdf), the following is NIXI's input.

A: IXPs serve as physical interconnection points, enabling autonomous networks—such as Internet Service Providers (ISPs), data centers, and content providers—to exchange internet traffic locally. They function as neutral platforms that facilitate efficient data routing and reduce latency. Unlike telecommunication networks, IXPs do not provide end-to-end connectivity or telecommunication services directly to end-users. Therefore IXPs does not meet the criteria for "telecommunication services" under the Act.

We recommend that TRAI reconsider the classification of IXPs within this consultation. Recognizing IXPs as neutral interconnection infrastructure.

Thank You,

Regards,

Soumen