

**SPICE RESPONSE**  
**CONSULTATION PAPER ON INTERNET TELEPHONY**

**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? Please give your suggestions with justifications. (para 3.10)**

**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? Please give your suggestions with justifications. (para 3.11)**

Ans: ISP Licenses were introduced primarily to quicken the pace of spread of Internet & Broadband services in the country; that is why minimal Entry fee & Regulatory framework were prescribed. Even today that objective is yet to be achieved. Voice telephony calls ( Local & Long distance) have already reached Affordable levels. Therefore first of all, a view is required to be taken as to Whether time has come for the Regulator to graduate from SERVICE SPECIFIC N/W regulation to SERVICE NEUTRAL regulation? If so,

- To permit ISP's to provide internet Telephony services to call PSTN/PLMN subscribers within India
- To remove regulatory impediments
- To create level playing field

ISP licensees may have to be asked to migrate to UASL license by paying Requisite license fee as recommended by TRAI in its earlier recommendations (Review of licensing T&C dated 28-8-2007)

**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? (para 3.12)**

Ans: All UAS Licensees can follow same Interconnect regime as applicable to Fixed Line Network, facilitating ISP networks to make only o/g calls. Interconnect should be through SS7 and ISP to convert signaling from IP to SS7 till such conversion is required.

**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? (para 3.12)**

Ans: No specific changes are envisaged in the IUC regime , as Internet Telephony will grow because of its greater affordability, rather Regulator must ensure that primary goal of ISP “to expand Internet /Broadband usage” should Not be lost sight of.

**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? Please give your suggestions with justifications. (para 3.13)**

Ans: There is a need to have a separate level for the numbering scheme applicable to Internet telephony,as QOS will be different from standard voice telephony. Numbering scheme should not be at the cost of E.164 number series, intended for telephony networks,and their expansion needs..

**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? (Para 3.4)**

Ans: As of today, UASL / CMTS operators can use IP technology to provide VoIP services , Now that TRAI has given clarifications, they can also provide Internet telephony . Such devices can also be allocated suitable number resources as and when permitted for internet telephony. However, number resources as and when permitted should be discretely identifiable across all operators and intended only for Internet Telephony.,so that QOS parameters can be independently measured

**4.7 If ISPs are allowed to receive Internet telephony calls on IP devices/ Adopters, what numbering resources should they be allocated? (para 3.13)**

Ans: TEC may be asked to examine and work out a distinct number series. However, in such a case, ISP’s must obtain NLD/ILD licenses.

**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? Please give your suggestions with justifications. (para 3.14)**

Ans: Option of implementing should be left to ISPs, except Licensee should inform this aspect as one of the limitations of his service,like likely QOS etc...

**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? Please give your suggestions with justifications. (para 3.15)**

Ans: Lawful Interception / Monitoring facility should be mandatory and provided by every licensee including those permitted to provide only Internet Telephony. In addition, ISPs providing Internet Telephony may have to provide the encryption code to security agencies to monitor the IP packets.

**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. (para 3.16)**

Ans: Any mandating will add to the cost, and defeat the very purpose of cheap service. For the sake of seamless implementation of future services, ISP's should Be encouraged to bring QOS at par with that of standard networks.

**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. (para 3.17)**

Ans: No mandating, but improvement in QOS parameters should be a precondition for full interoperability.