

## Response to Consultation Paper on Internet Telephony

**Q1: What should be the additional entry fee, Performance Bank Guarantee (PBG) and Financial Bank Guarantee (FBG) for Internet Service providers if they are also allowed to provide unrestricted Internet Telephony?**

In order to encourage inventiveness in this field, and as there is no need for roll out obligations, there should be no additional financial restrictions on Internet Telephony.

**Q2: Point of Interconnection for Circuit switched Network for various types of calls is well defined. Should same be continued for Internet Telephony calls or is there a need to change Point of Interconnection for Internet Telephony calls?**

The POI for Internet calls should be the SDCA of the Unified access service provider.

**Q3: Whether accessing of telecom services of the TSP by the subscriber through public Internet (internet access of any other TSP) can be construed as extension of fixed line or mobile services of the TSP? Please provide full justification in support of your answer.**

From the view of telecom regulations, the main differentiator between fixed and mobile services is the additional burden for Authorities to make available spectrum for mobile services. Since Internet calls do not cause this burden, they should be construed as an extension of fixed line services.

**Q4: Whether present ceiling of transit charge needs to be reviewed or it can be continued at the same level? In case it is to be reviewed, please provide cost details and method to calculate transit charge.**

There is no difference in transit cost between Internet calls and any other, so the transit charge need not be reviewed at this stage.

**Q5: What should be the termination charge when call is terminating into Internet telephony network?**

The same as termination charge when terminating into wireline networks.

**Q6: What should be the termination charge for the calls originated from Internet Telephony Network and terminated into the wire- line and wireless Network?**

The same as termination charge when originating from wireline network.

**Q7: How to ensure that users of International Internet Telephony calls pay applicable International termination charges?**

By way of declared ANI. This is consistent with the view that the Internet leg is the last mile of the PSTN leg. In this scheme Indian numbers must only be provided to India resident customers by the ISP.

**Q8: Should an Internet telephony subscriber be able to initiate or receive calls from outside the SDCA, or service area, or the country through the public Internet thus providing limited or full mobility to such subscriber?**

Yes. Location irrelevance is central to the appeal of any Internet service.

**Q9: Should the last mile for an Internet telephony subscriber be the public Internet irrespective of where the subscriber is currently located as long as the PSTN leg abides by all the interconnection rules and regulations concerning NLDO and ILDO?**

Yes.

**Q10: What should be the framework for allocation of numbering resource for Internet Telephony services?**

By way of suballocation of numbering resources by Unified access provider. 300 numbers per E1 is fair. Access providers can charge separately for numbering resources when taken beyond this, at present at unregulated rate. ISPs should not be allowed to approach authorities for allocation of numbers, so as to maintain the distinction between Unified access and ISP licence and to reduce regulatory burden.

Another facet of numbering is the ability to declare full CallerID. The Indian Call center industry requires the ability to declare chosen CallerID, unbound to the SDCA to which the ISP connects. The ISP should be made responsible to ensure the customer owns or is authorised to declare the relevant CallerID.

Ability to declare CallerID is also required to maintain competitiveness of interconnection. ISP should be allowed to choose the Access provider to complete outbound calls regardless of which access provider has provided numbering resources.

**Q11: Whether Number portability should be allowed for Internet Telephony numbers ? If yes, what should be the framework?**

Yes, it should be allowed, by way of suballocation of numbering resources by Unified access provider to which ISP is connected.

**Q12: Is it possible to provide location information to the police station when the subscriber is making Internet Telephony call to Emergency number? If yes, how?**

It is not possible to provide real time information for emergency calls via Internet Telephony.

Niether is it needed anymore. Worldwide emergency call regulations were drawn up 50 years ago, when access and voice service were coupled, hence used location information available with access provider. Now better location information is available using GPS/mobile triangulation and a smart phone. India can leapfrog emergency services by utilising this available infrastructure. Authority should separately consider a National Emergency App to allow public services to respond faster than currently possible worldwide.

**Q13: In case it is not possible to provide Emergency services through Internet Telephony, whether informing limitation of Internet Telephony calls in advance to the consumers will be sufficient?**

Yes, that will be sufficient. Considering current state of location information to emergency services in India, excessive regulation in this regard will be to put the apple before the cart.

**Q14: Is there a need to prescribe QoS parameters for Internet telephony at present? If yes, what parameter has to be prescribed? Please give your suggestions with justifications.**

Once we decouple access from voice services, QOS parameters are not possible. This is a known limitation of Internet telephony services.

**Q15: Any other issue related to the matter of Consultation.**

Worldwide, the phase of proliferation of mobile services is nearing an end. Now most value creation in Telecom sector is by new age telecom services such as Skype, Whatsapp, Twilio etc. All of these are in the Internet space and none of them are Indian. Lack of innovative telecom services is hurting many job creating sectors of the Indian Economy. Authority should replicate its success in the mobile field and ensure Internet / new age telephony services are available to Indian consumers. Specific to India this will have following benefits:

1. ISPs can front end BSNL/MTNL's wireline switching capacity for innovative services to Indian businesses, leading to a revival of these public sector firms.
2. Improve competitiveness of Indian service exporters such as Indian Call Center Industry, KPO, BPO etc.
3. Allow emergence of homegrown Internet success stories in the consumer space as in China.