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भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

To,

Advisor (Broadband & Policy Analysis),
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg, New Delhi

No. Regln/1-10/2012/1727

Dated: 5-09-2016

{Kind attention: Sh. Arvind Kumar}

Sir,

Sub:- BSNL's Draft Reply on TRAI's Consultation Paper on "Internet Telephony (VoIP)"

Kindly refer to the TRAI's press release no. 51/2016 and TRAI's consultation paper no. 13/2016 on "Internet Telephony (VoIP)" dated 22-06-2016. In this context, point wise BSNL's comments are as follows.

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?

BSNL's Comments: The unrestricted telephony may be allowed for those ISP's who are either having TSP license or USAL. Not required in case extension is related to TSP/ISP Access part of TSP/ISP network only.

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?

BSNL's Comments: No change on POI recommended.

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.

BSNL's Comments: Yes, in case extension is limited in Access part of TSPs network as there is no change in POI/ Interworking with other operators.

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.

BSNL's Comments: TRAI Regulations provides for provider (existing TSP) and seeker (new TSP) amongst all service providers. A TSP is a seeker who is granted license subsequently and who launches services at a later date than the existing TSPs. And the same TSP is a provider to other TSPs who have been granted license and who launched services at a later date. Transit facility must be allowed by a provider TSP only, between its seeker TSPs, and that too only through a GMSC/Transit/ TAX Switch.

A new Access Service TSP should be encouraged to have direct connectivity with other existing access service TSPs in the LSA. And for the same, transit charge must be increased, so that direct interconnectivity is ensured at the earliest.

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The present cap of transit charge at 15p must be increased to 35p which is at par with the present applicable max carriage charge.

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

BSNL's Comments: From the consultation paper floated by the Authority, the following emerges:

1. An ISP shall be required to setup IMS Gateway in the LSA where the ISP intends to provide IP Telephony.
2. Through the IMS Gateway, the ISP providing IP Telephony shall have interconnectivity with other access service/ NLD/ ILD providers.
3. For NLD/ ILD Calls, the call shall get routed up to IMS Gateway in the same LSA and then through NLDS/ ILDS, to the terminating destination.
4. For intra LSA Calls, the call gets routed up to IMS Gateway in the same LSA and then through its POI to the terminating destination
5. Basically it also implies that IP telephony allows ISPs to provide last mile connectivity to subscribers in ways similar to access service providers.

In view of above, an ISP shall be required to setup an IMS gateway in its operating LSA and connect to other existing Access Service Providers in the LSA for intra-LSA calls and to NLDS/ ILDS for NLD/ ILD calls.

Hence, IP Telephony is just another access network which provides access point to a customer to make/ receive calls.

The present Interconnect Usage Charges are:

As per the present IUC framework Rs 0.14/- per minute is the termination charge of the domestic calls on wireless network, if calls are originating from domestic wireless network. For rest of domestic calls termination charge has been set to zero. For international calls, a termination charge has been prescribed as 53 paise per minute. IUC regulation has prescribed 35 paise per minute as ceiling for the carriage charges

BSNL's proposed FMT service is distinct from IP Telephony in as much as BSNL is offering the same as value added services to its existing Wireline customers. There is no separate termination charge applicable other than what is applicable to wireline network. In contrast, as we understand, IP Telephony is as good as Wireless Service, as it allows its customers mobility in the LSA as well as roaming.

Hence, termination charges, similar to applicable for wireless network may be proposed for IP Telephony as:

S No	Calling N/W	Called N/W	Termination Charge
1	IP	IP	0.14p
2	Wireless	IP	0.14p
3	Wireline	IP	0 (zero)

Termination charges from wireline to IP has been kept zero to encourage other TSPs to provide wireline services in small cities/ towns, rural areas and remote areas.

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

BSNL's Comments As already discussed above, for calls originating from wireline/ wireline network and terminating on IP network, the following termination charges are proposed:

S No	Calling N/W	Called N/W	Termination Charge
1	IP	Wireless	0.14p
2	IP	Wireline	0 (zero)

In additions, TRAI states, in its Consultation paper as:

The most important issue with Internet Telephony calls is that it is very difficult especially by the terminating operator, to identify the originating network (if same number is used for Internet Telephony and PSTN/PLMN) or country of the call. Difference in termination charge between Internet Telephony and PSTN/PLMN will lead to the possibility of arbitrage and the impact on the market can be substantial.

However, similar situation exists for calls made by international roaming subscribers. It is very difficult by the terminating operator, to identify the location of the calling subscriber network. Presently there are a lot of issues in this matter and BSNL has at times even referred the matter to the Authority. In this regard BSNL proposes that for Terminating Network, CLI based billing be made a standard. The Authority may take appropriate actions to resolve such issues.

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

BSNL's Comments: International Internet telephony providers are not connected at present with Thane ILD Gateway. It may be made mandatory for International Internet Telephony providers to take Interconnectivity within BSNL as ILDO to handover the call to ensure that International Internet Telephony calls pay applicable International termination charges.

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?

BSNL's Comments: Yes, as this mobility is related to access part of TSPs network unlike in case GSM roaming where customer roams in other GSM operator network where his call attempt is processed.

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?

BSNL's Comments: Yes

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

BSNL's Comments: Existing numbering scheme of fixed telephony as well as new numbering scheme should be ok.

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

BSNL's Comments: Not applicable.

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?

BSNL's Comments: IP location/ area can be shared, which can be mapped with IP address.

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?

BSNL's Comments: Customer can dial Emergency number of Home areas.

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.

BSNL's Comments: Yes, within operator network other than public network.

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

BSNL's Comments: No comments


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Raghuvir Singh
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