

Counter Comments on TRAI Consultation Paper on Internet Telephony paper released on July 22, 2016

Herein we address our counter comments to fundamental flaws outlined in comments by various incumbent TSPs concerning Internet Telephony.

Preamble

1. Existing incumbent TSPs have a vested interest in creating confusion to prevent the launch of Internet Telephony in India. This is because -
 - a. Internet Telephony will result in a cost reduction for voice traffic by upto 3X or more, forcing competitive price reduction and hence a reduction in topline (revenue) of their business.
 - b. Internet Telephony will permit players with technology prowess to provide innovative services that incumbent TSPs are unable to provide
2. Even though Internet Telephony would be beneficial to consumers by reducing prices and providing innovation existing TSPs prefer to keep Internet Telephony a controversial matter. This is apparent in the fact that none of them have launched unrestricted Internet Telephony even for their own subscribers, let alone other subscribers, even though the provisions for launching the same have existed in their respective licenses for almost a decade (since 2008).
3. India, and Indian consumers have been robbed of the opportunity and innovation that Internet Telephony brings for almost a decade due to the self serving interests of incumbent TSPs
4. India is currently amongst the worst countries in the world wrt Internet Penetration. United States crossed 80% Internet Penetration over a decade ago, while in India we still are below 30%
5. India is currently amongst the worst countries in the world wrt wifi hotspot penetration. India has 30,000 commercial hotspots as of April 2016 (<https://www.ipass.com/wifi-growth-map/>), while United States has 55 million and China has 17 million.
6. India is also amongst the worst countries in the world with respect to Internet Telephony. Below is the list of 104 countries that permit full mobility, use of existing numbering plan

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and ability to provide and sell Internet Telephony over the public Internet of ANY ISP in the world -

Albania, Algeria, Angola, Argentina, Armenia, Australia, Austria, Bahrain, Barbados, Belarus, Belgium, Benin, Brazil, Bulgaria, Cambodia, Canada, Cayman Islands, Chile, China, Colombia, Congo, Costa Rica, Country, Croatia, Curacao, Cyprus, Czech Republic, Denmark, Dominican Republic, El Salvador, Estonia, Finland, France, Georgia, Germany, Ghana, Greece, Grenada, Guatemala, Guinea, Hong Kong, Hungary, Iceland, India, Indonesia, Iran, Ireland, Israel, Italy, Jamaica, Japan, Kazakhstan, Kenya, Kuwait, Kyrgyzstan, Latvia, Liechtenstein, Lithuania, Luxembourg, Macau, Malaysia, Malta, Mauritius, Mexico, Moldova, Morocco, Namibia, Netherlands, New Zealand, Nigeria, Norway, Pakistan, Panama, Peru, Philippines, Poland, Portugal, Puerto Rico, Romania, Russia, Serbia, Singapore, Slovakia, Slovenia, South Africa, South Korea, Spain, Sri Lanka, Sweden, Switzerland, Taiwan, Tajikistan, Tanzania, Thailand, Trinidad & Tobago, Turkey, Uganda, Ukraine, United Kingdom (UK), United States of America (USA), Uzbekistan, Vatican City, Venezuela, Vietnam

A few examples of providers who can provide Internet Telephony for the above countries includes <http://voyced.eu>, OR <http://voxbone.com>, OR <http://didww.com>, OR <http://VOIP.ms>, OR <http://didx.net>, OR <http://rincentral.com>, OR <http://telserv.nl>

7. We now address counter comments to fallacies in the arguments made by various incumbent operators in their response to TRAI's consultation paper

ITU definition of Public Internet

8. One of the main distortions that incumbent TSPs are attempting is to distort the meaning of the term "public internet". In the Unified License the definition of Internet Telephony has been provided as below -

46. INTERNET TELEPHONY means transfer of message(s) including voice signal(s) ***through public internet***.

9. Vodafone argues in their comments that the term "public internet" must be limited to mean only the Internet connection provided by Vodafone to its subscribers. Vodafone for instance argues that only Vodafone can provide Internet Telephony to its subscribers and that no other provider can provide Internet Telephony to Vodafone's subscribers.
10. However the term "Internet Telephony" and the corresponding term "public internet" are actually well defined in a Background issues paper of the International

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Telecommunication Union issued on 29th May 2000, available here - <https://www.itu.int/osg/spu/ni/iptel/workshop/iptel.doc>. Quoting from this original ITU document (page 7) -

Internet Telephony: IP Telephony in which the principal transmission network is the ***public Internet***.

The Public Internet (also referred to as the Internet): The ***global, public, IP-based meta-network*** created by the ***interconnection of many public and private IP-based networks***.

11. The above definition removes all possible ambiguity whatsoever on the term “public internet”
12. Infact we submit that the definition of Internet Telephony AND the term “public internet” were actually lifted by DoT from this very ITU document and inserted into the License.

Definition of “Internet” in the License

13. Further more, the term “Internet” is also defined in the Unified License as below

44. INTERNET: Internet is a ***global information system*** that: (i) is logically linked together by a globally unique address, based on Internet Protocol(IP) or its subsequent enhancements/upgradations; (ii) is able to support communications using the Transmission Control Protocol/Internet Protocol (TCP/IP) suite or its subsequent enhancements/upgradations, and all other IP compatible protocols;

14. As can be seen, the license itself defines the “Internet” as a “global information system”. Hence the term “public internet” cannot have a more restrictive meaning than the definition of “Internet” itself as laid out in the license.

Last mile link

15. A few incumbents have argued that even if Internet Telephony were to be provided by a TSP it must be provided on their own last mile. They rely on the following clause in the Access Services Agreement -

2.1(a)(i) The Access Service under this authorization covers collection, carriage, transmission and delivery of voice and/or non-voice MESSAGES over

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Licensee's network in the designated Service Area. The Licensee can also provide Internet Telephony, Internet Services including IPTV, Broadband Services and triple play i.e voice, video and data. While providing Internet Telephony service, the Licensee may interconnect Internet Telephony network with PSTN/PLMN/GMPCS network. The Licensee may provide access service, which could be on wireline and / or wireless media with full mobility, limited mobility and fixed wireless access.

16. The words “over Licensee’s network” are used by incumbents to create a confusion that that all voice services must be offered over Licensee’s network only.
17. However this interpretation is incorrect. The sentence simply says that the License provides the ability for the Licensee to carry voice over their own network. However the License ALSO permits the Licensee to carry voice over the network of other Licensees as authorized in the License itself. There are at least 4 clauses in the license that enable a Licensee to use networks of other TSPs.
18. For instance in transmitting a voice call, TSPs hand over long distance traffic to other NLDOs whose network is used to terminate a call. This would not be deemed to be the Licensee’s network. However there is an explicit clause (Chapter VIII 2.2) permitting the Licensee to do so in the manner as provided for in the agreement, and hence the Licensee may handover traffic to other NLDOs.
19. Similarly the License enables a Licensee to provide roaming to their customers on another TSPs network as provided for in the License. This is covered in clause Chapter VIII 2.1 (a) (ii) to (iv). The License enables a TSP to enter into an agreement with another TSP to use their network for last mile.
20. Similarly the License enables a Licensee to provide services to their customers by using the cable network of cable providers in clauses Chapter VIII 2.3 and 2.4. In this case again the License allows the TSP to use cable providers for their last mile in the manner stated.
21. In the exact same vein the License provides the Licensee the ability to use the “public internet” as the last mile for Internet Telephony by the very definition of Internet Telephony in the agreement

46. INTERNET TELEPHONY means transfer of message(s) including voice signal(s) **through public internet**.

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22. Note that the above definition does not say “Licensee’s public Internet”. It simply says “public Internet”. Much like other provisions enable Licensee to use last mile of cable operators or network of other TSPs, this provision is the enabling provision that enables a TSP to provide Internet Telephony over the public Internet of any ISP.

23. Additional reference must be made to the language used when providing for Internet Telephony above -

2.1(a)(i) The Access Service under this authorization covers collection, carriage, transmission and delivery of voice and/or non-voice MESSAGES over Licensee’s network in the designated Service Area. The Licensee can also provide Internet Telephony, Internet Services including IPTV, Broadband Services and triple play i.e voice, video and data.

24. Note the use of the word “also”. The use of the word “also” means that the Licensee can do what is permitted in the first line AND ALSO do what is permitted in the second line.

The Access Service under this authorization covers collection, carriage, transmission and delivery of voice and/or non-voice MESSAGES over Licensee’s network in the designated Service Area **AND ALSO** The Licensee can provide Internet Telephony

25. This means any restrictions in the first part of the line will not apply to Internet Telephony since it is an ADDED service that can be provided by the Licensee over and above the rights granted to it by the first line.

Internet Telephony and Internet Services are distinct and can be provided separately

26. It is also important to note the manner in which Internet Telephony is covered under the License below -

2.1(a)(i) The Access Service under this authorization covers collection, carriage, transmission and delivery of voice and/or non-voice MESSAGES over Licensee’s network in the designated Service Area. The Licensee can also provide **Internet Telephony, Internet Services including IPTV**, Broadband Services and triple play i.e voice, video and data. While providing Internet Telephony service, the Licensee may interconnect Internet Telephony network with PSTN/PLMN/GMPCS network. The Licensee may provide access service, which could be on wireline and / or wireless media with full mobility, limited mobility and fixed wireless access.

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27. Note the above clause. Internet Telephony and Internet Services are stated as two separate services. Hence the clause envisions a provider who may provide Internet Telephony WITHOUT providing Internet Services or vice versa. If the Licensee were required to have their OWN Internet last mile in order to provide Internet Telephony then they would not be stated as independent distinct services in the above clause.

TRAI 2008 consultation paper

28. Incumbent TSPs have made an argument that TRAI is changing its definition of “public internet” from its 2008 consultation paper. However they are making gross misrepresentations to confuse the Authority with baseless claims. TRAI’s position in 2008 is the same as its position currently in 2016.

29. Their argument states that in TRAI’s consultation paper the diagrams below suggest that the Public Internet begins AFTER the ISP network and that Internet Telephony packets must be carried to the public Internet by the same ISP that is providing the Internet Telephony Service

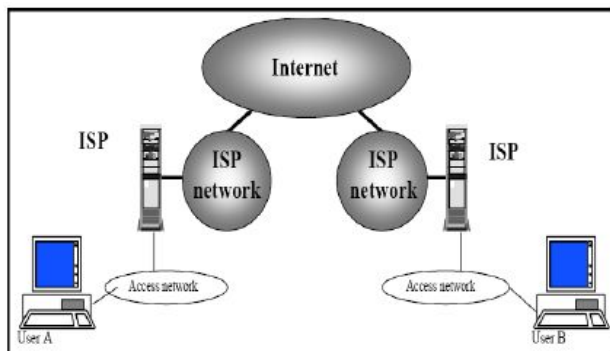


Figure 1 “Refer : Fig. 2.3 PC-to-PC Internet telephony”

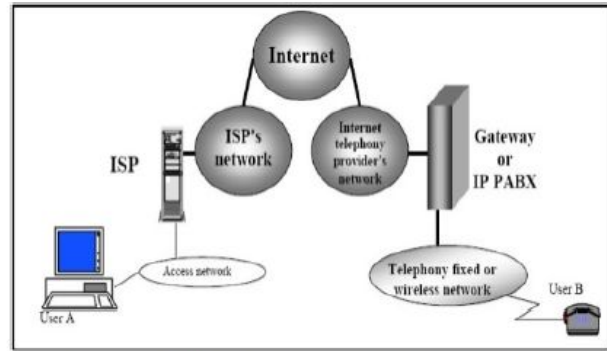


Figure 2 “Refer : Fig. 2.4 PC-to-Phone Internet telephony”

30. This argument is a gross misrepresentation of facts. The comment simply takes one diagram out of context without actually reproducing the entire text from the May 12 2008 consultation paper of TRAI

31. Firstly and most importantly, both of the above diagrams were inserted by TRAI into its May 2008 consultation paper from an ITU workshop report on IP Telephony available here (<http://www.itu.int/ITU-T/special-projects/ip-policy/final/Attach15.doc>). Please refer to section 1.2.3.1 of this very report which we have reproduced below -

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When the computerized user wishes to call a correspondent on the latter's telephone set, **he must begin by connecting to the Internet in the traditional manner via the network of his ISP. Once connected, he uses the services of an Internet telephony service provider (ITSP)** operating a gateway which ensures access to the point that is closest to the telephone exchange of the called subscriber.

32. As can be seen above in the ORIGINAL paper that contained these diagrams from the ITU, it is clearly stated that a user first connects to the Internet through any ISP of their choice and then AFTER he has connected to the internet he uses the services of an Internet telephony service provider (ITSP) independently. This original paper referencing both these diagrams clearly states that the Internet Service Provider is different from the Internet Telephony Service Provider.
33. Secondly, we must also look at the actual text that TRAI itself has quoted along with the above diagrams in its May 2008 consultation paper. Please find the actual text quoting from paragraph 2.2.1.2 of the TRAI consultation paper May 2008 which contain the above diagrams -

2.2.1.2 PC-to-Phone Internet telephony: In this type of Internet telephony, user at one end connects his PC to Internet provided by an ISP while the other user is a PSTN/PLMN subscriber (refer Fig. 2.4). **User A, when connected to Internet has to use the services of some Internet Telephony Service Provider (ITSP) operating Internet telephony gateway** to connect to called subscriber (User B)

34. As can be seen above the paper says that the user is connected to the internet through an ISP. This maybe any ISP that the user normally connects to the Internet. It does not state that the user must use the Internet Services of the same ISP as the one through which it obtains the Internet Telephony Services. Infact the same paragraph above further goes to say that when the User A has connected to the Internet he has to use the services of **some Internet Telephony Service Provider (ITSP)** to call user B. The TRAI paper itself is stating that the user obtains Internet connectivity from one provider and Internet Telephony from another.
35. Further reference maybe made to the next paragraph in the May 2008 consultation paper -

2.2.1.3 Internet telephony using adapter boxes: This mode of Internet telephony uses an adapter (similar to modem box), which is installed between the user's conventional telephone set and Broadband Customer premise equipment (CPE) (refer Fig.2.5). User connects normal phone instrument to such adapter,

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which is directly **connected to a Broadband Internet connection**. The adapter converts voice into IP packets and **sends it through Internet to VoIP gateway of ITSP** for further routing of the call

36. Note again above clause. TRAI itself says that the user may connect their Internet Telephony Adaptor to **A BROADBAND** Internet Connection. Further the adapter converts voice into IP packets and sends it **through the Internet** to the gateway of the **ITSP (Internet Telephony Service Provider)**. TRAI itself distinguishes between the ITSP (Internet Telephony Service Provider) and the broadband internet connection provider as two separate entities. It is abundantly clear that the user maybe connected to ANY broadband internet connection and not one that must be provided by the ITSP.
37. In fact the entire consultation paper and the pursuant recommendation talks about Internet Telephony's growth in other countries, whereas India is lagging behind and if one were to refer to the implementation of Internet Telephony in any country in the world it refers to a user being able to make a call over the public internet while being connected to any ISP of their choice
38. Nowhere in the entire consultation paper has TRAI made any statement that the ISP and ITSP must be one and the same and that the user MUST connect to the ITSP through an internet connection provided by the ISP. They have infact stated exactly the opposite. By only reproducing the diagrams, without reproducing any of the text in their comments, the incumbent operators are misrepresenting the facts.
39. Lets also take a look a TRAI's latest consultation paper on IUC. Reproducing paragraph number 2.19 from this paper below -

2.19 Further, under the current licensing framework in the country, the access service providers can also provide 'Internet Telephony'. When voice is transmitted over public internet, it is termed as Internet Telephony. When a TSP uses Internet Telephony for terminating a call, **the call has, not necessarily, to travel through its own 2G, 3G or 4G radio access networks (RANs)**. Whenever a TSP does use its RAN for delivering an Internet Telephony call to its subscriber, the receiving party separately pays for the data transfer done in receiving the call.

40. As can be seen above, TRAI's position on this has been clear in 2008 and all the way to 2016. TRAI has always maintained that the ISP and ITSP are different entities and that when a subscriber obtains Internet Telephony from one TSP it can obtain the Internet Connection from any ISP.

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41. Incumbent operators who want to kill Internet Telephony and want to protect their revenue from their legacy networks, are trying to confuse the authority by only reproducing one diagram without the associated explanatory notes from the very same consultation paper as well as the original ITU workshop paper from which these diagrams were lifted.

Restricting access to Internet Services is a License violation

42. The argument that a TSP must carry their Internet Telephony traffic only on their ISP connection is a fundamental violation of the License. By making this claim essentially a Vodafone is saying that Vodafone will only carry the Internet Telephony traffic of Vodafone's Internet Telephony services and will NOT carry the data packets for the Internet Telephony traffic of any other TSP. However the ISP license expressly prohibits blocking any internet service or traffic by any ISP. Check clause 2.1(i) from the ISP license below

2.1 (i) The Licensee may provide Internet access including IPTV. **The subscriber shall have unrestricted access to all the content available on Internet** except for such content which is restricted by the Licensor/designated authority under Law. The

43. If for eg Vodafone or Airtel were to block or disallow Internet Telephony traffic of any other provider it would be a direct violation of this License condition. Hence their comments that Internet Telephony Traffic must only be carried by the same TSP that provides the Internet Telephony and no other ISP is invalid.

44. India would become the ONLY country and the WORST country in the world if one ISP would block the Internet Telephony traffic of another ISP. It is foolish to assume that DoT and TRAI have issued such a contrarian policy where their License conditions state otherwise.

Public internet in general parlance

45. It is important to understand the meaning of the word "public Internet". There are two types of networks - public network and private network.

46. If data / messages travel entirely over networks owned by a single operator then the messages are deemed to have traveled over a private network.

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47. If data / messages travel partly or wholly over a network that is NOT owned by a TSP then they are said to have travelled over the “public network”.
48. Hence it is apparent that the very definition of Internet Telephony in the license enables that the “voice packets” be transmitted or carried over network elements that are NOT owned by the Licensee. It follows therefore that the last mile for Internet Telephony can be over the general public internet as opposed to the private network elements of the TSP who is providing the Internet Telephony

Prevailing practices

49. As it stands today, existing ISPs providing Internet Telephony allow their subscribers to make Internet Telephony calls while being connected to the Internet through any ISP, anywhere in the world.

Resale of services

50. Incumbent TSPs have made an argument that providing Internet Telephony using the public internet through any ISP tantamounts to illegal resale of services which is prohibited by the License.
51. When providing Internet Telephony, a TSP is not reselling any service to a subscriber. The Subscriber is himself buying internet bandwidth directly from an ISP of their choice and buying Internet Telephony as a original service separately from the TSP.

CLI masquerading / tampering

52. Incumbent TSPs allege that providing Internet Telephony can result in CLI tampering or CLI masquerading. This is a blatant misrepresentation. An Internet Telephony provider provides Internet Telephony under their UL license with Access authorization. The License itself prohibits a TSP from tampering or manipulating CLI. The TSP bears a risk of 50 crore penalty incase of any violation of license conditions.
53. There is a misunderstanding and misrepresentation in the comments by incumbent TSPs. A TSP who provides Internet Telephony to a subscriber must obtain from that subscriber a CAF form and address and identity proof. Against this the TSP will provide the subscriber an E.164 number (either national number or SDCA linked number). This

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is the number that will be used for CLI when making a call. This number is registered to a verified subscriber and is a valid CLI for that subscriber.

54. CLI tampering means when TSP is changing CLI of the subscriber while processing the call. When providing Internet Telephony service to a subscriber a TSP will allocate a E.164 number from its own pool to such subscriber and the same will be used as a CLI for any outbound calls made by such subscriber. Hence there is no tampering, manipulation or change of CLI occurring while providing Internet Telephony Service.

Internet Telephony is “content” and hence TRAI cannot regulate it

55. Indeed it is surprising to see the lengths to which incumbent TSPs will go to, to misrepresent Internet Telephony
56. One of the arguments presented in their comments is that Voice over IP is “content” and is hence outside of the purview of the TRAI Act. This is a perverse misrepresentation
57. Firstly, Internet Telephony is separate from Voice over IP. Voice over IP is the protocol by which voice is carried over an IP network. Internet Telephony on the other hand as contemplated in this consultation paper constitutes providing a Telephony Service, complete with a phone number and PSTN connectivity to the end user. The Internet Telephony Service as a whole is not “content” by itself.
58. Secondly, the DoT issued license in itself makes Internet Telephony a part of a set of services that can be offered by an Access Licensee by stating as under -

Scope of Access Service: The Licensee can also provide Internet Telephony, Internet Services including IPTV, Broadband Services and triple play i.e voice, video and data. While providing Internet Telephony service, the Licensee may interconnect Internet Telephony network with PSTN/PLMN/GMPCS network.

59. Hence as can be seen, Internet Telephony is a technology to provide a Telephony Service. And Telephony Services, and their interconnection rules are entirely under the purview of DoT and TRAI.
60. To say that TRAI and DoT cannot regulate a service authorized under the license is a gross misrepresentation of facts.

DoT has not issued directions / instructions for Translation

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61. Another argument laid out by incumbent operators in their comments to try and kill Internet Telephony is the below clause in the Access license

Translation of E.164 number / private number to IP address and vice versa by the licensee for this purpose shall be as per directions/instructions issued by the Licensor.

62. Incumbent operators claim that there have been no such directions issued by DoT and hence one cannot launch Internet Telephony without obtaining directions from DoT

63. This is again a gross misrepresentation. This clause is simply meant to state that if DoT were to ever issue any directions / instructions for such translation then the same would be followed by the Licensee. In absence of any such directions it does not state that a Licensee cannot launch Internet telephony services. Infact there are many such clauses in the entire license which state that the Licensee must abide by any directions or instructions issued by the Licensor. These clauses do not prevent the Licensee from launching any service that they are authorised to launch under the license, but rather only seek to ensure that if the Licensor were to issue any directions or guidelines in the future the Licensee is obligated to follow them. Here are a few examples of other such clauses in the license

29.6 The Licensee shall also facilitate the priority routing of emergency/public utility or any other type of user calls as per guidelines /directions as may be prescribed by Licensor.

39.12 In the interests of security, suitable monitoring equipment as per requirement of the Licensor or designated Security Agencies for each type of system used shall be provided by the Licensee for monitoring as and when required by Licensor. The specific orders or directions from the Government, issued under such conditions, shall also be applicable.

64. As can be seen above the License contains numerous paragraphs where reference is made to directions that maybe issued by Licensor or TRAI. The License merely contemplates that a Licensee must follow these directions as and when issued. It however does not require a Licensee to wait for certain directions to be issued to offer authorized services under the License

65. Note that the aforementioned clause on translation has been in existence since 2008. It is preposterous to assume that DoT has been collecting 15 crores in license fees from UL licensees authorising them to provide Internet Telephony services but not allowing

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them to do so for over 8 years by not issuing any directions for the same. If DoT needed to issue any directions in this regards they would have done so long ago and if they desire to issue any new directions they may do so at anytime. It does not mean that no licensee can even start providing the service inspite of paying 15 crores to the government.

Interconnection is not mandatory

66. Another baseless claim by incumbent operators in their attempt to kill Internet Telephony is that the License does not make it mandatory for TSPs to interconnect with other TSPs with respect to Internet Telephony. They rely on a gross misrepresentation of the below clause -

2.1(a)(i) The Access Service under this authorization covers collection, carriage, transmission and delivery of voice and/or non-voice MESSAGES over Licensee's network in the designated Service Area. The Licensee can also provide Internet Telephony, Internet Services including IPTV, Broadband Services and triple play i.e voice, video and data. While providing Internet Telephony service, the Licensee may interconnect Internet Telephony network with PSTN/PLMN/GMPCS network. The Licensee may provide access service, which could be on wireline and / or wireless media with full mobility, limited mobility and fixed wireless access.

67. The baseless argument extended by incumbent operators is that the above clause states the Licensee MAY interconnect Internet Telephony network with PSTN and hence Interconnection for Internet Telephony is not mandatory but rather is optional

68. It is important to note the above clause is not meant for Interconnection between operators but rather meant to enable a Licensee to Interconnect their own PSTN Network to the public Internet while providing Internet Telephony.

69. This clause nowhere gives the right to a TSP to refuse interconnection to another TSP for any service whatsoever. Infact the License clearly states that a TSP must MANDATORILY provide an Interconnection to every TSP. This is clearly stipulated in the following clauses in the UASL and UL Licenses

UL License - 6.2 It shall be mandatory for the LICENSEE to interconnect to/ provide interconnection to all eligible Telecom Service Providers (eligibility shall be determined as per the service provider's License Agreement and TRAI's determinations/orders/regulations issued from time to time) to ensure that the

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calls are completed to all destinations. Further, the Licensor may direct the Licensee to implement the process whereby the subscribers could have a free choice to make inter-circle/ international long distance calls through NLD/ ILD Operator

UASL License - 26.5 It shall be mandatory for the LICENSEE to provide interconnection to all eligible Telecom Service Providers as well as NLD Operators

70. The above clauses make it mandatory for a TSP to provide an interconnection to any other TSP irrespective of the type and nature of services offered by such TSP

Internet Telephony governs Transfer which includes origination and termination

71. One more argument laid out by certain TSPs is that the definition of internet telephony under license only permits 'transfer' of messages/voice signals over the public internet, and not origination/termination of such signals on the public internet. They refer to this definition -

46. INTERNET TELEPHONY means transfer of message(s) including voice signal(s) ***through public internet***.

72. This is a baseless argument. The word "transfer" implies origination and termination. Here is the dictionary definition of the word transfer

Oxford dictionary: transfer - Move from one place to another.

73. The word transfer means moving something from one place (the origination point) to another place (the termination point).

Miscellany

74. Responses to various other arguments such as numbering plan, IUC etc have been adequately covered in VMobi's comments to TRAI's consultation paper in detail.

75. We additionally submit that every Licensee including an Internet Telephony Service Provider must follow the national numbering plan and all license conditions of DoT. Similarly any Licensee must obey any IUC regulations provided for by TRAI. If any Licensee were to violate any of these conditions then action would be taken against

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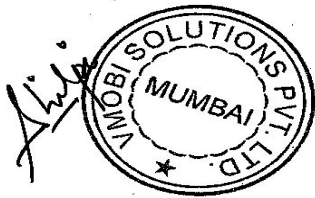
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them directly by the regulator and Licensor. Other TSPs are not authorized to or required to arbitrate what is allowed or disallowed as per the license conditions, nor block any services of any other TSP.

Conclusion

76. Existing incumbent operators have a vested interest in killing Internet Telephony in India. In spite of the same being permitted since 2008, Indian consumers have yet to see the benefits of Internet Telephony. In order to protect their revenue and margins, TSPs are robbing Indian customers of the opportunity to experience the latest technologies and innovations that Internet Telephony can bring about. They are making gross misrepresentations in their arguments by leaving out facts and conspiring to permanently deny the benefits of Internet Telephony to Indian consumers.

Thanking you,
Yours Sincerely,
For VMOBI Solutions Private Limited



Shilpi Jaiswal
Authorised Signatory

Date :- September 13, 2016
Place : Mumbai

CIN: U64100MH2015PTC267519

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