



Representing the ecosystem of Internet -Bharat Model

Ref: CCAOI/ TRAI/070211
7th February, 2011

Mr. Lav Gupta,
Principal Advisor (TD)
Telecom Regulatory Authority of India (TRAI)
Jawahar Lal Nehru Marg
New Delhi-110002

Sub: CCAOI's response to TRAI Consultation Paper released on 14th Jan 2011 on
"Issues related to Telecommunications Infrastructure Policy"

Dear Sir,

At the outset, we would like to congratulate the Telecom Regulatory Authority of India (TRAI) for coming out with a consultation paper on the "Issues related to Telecommunications Infrastructure policy".

During the last decade we have witnessed the Telecom Revolution which in turn has significantly impacted the socio-economic environment and business dynamics of the country, making India a name to reckon in the global map. However, if we want to set in the next wave of growth, and usher in the broadband/ data revolution, the government needs to formulate and roll out the next level of reforms.

Since the Ministry of Communications & Information Technology has released the 100-day agenda for the Indian telecom sector, and also announced the formulation of a new and comprehensive National Telecom Policy, 2011, the time is ripe for a comprehensive review to build a forward looking and transparent policy.

In that context, like the other pillars of telecom and internet, the telecom infrastructure also needs special consideration. In that context please find below our Issue wise submission:

Internet Exchange Point

6.3 Do you perceive the need for effective Internet exchange point(s) in the country to efficiently route domestic IP traffic?

CCA O I Response: It is always advisable for a country to have an independent Internet Exchange point(s) to route the domestic IP traffic. Fortunately for India, we already have

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an effective and efficient Internet exchange called National Internet Exchange of India (NIXI) which is fully operational and routing the domestic IP traffic since 2003.

6.4 If your answer to issue in 6.3 is in affirmative, please comment on the licensing framework of the entities for setting up Internet Exchange Points in India.

NA

6.5 Will it be desirable to permit those Unified licensees to setup IP exchange points in the country who have no vested interest in routing of the IP traffic

CCAIO Response: As mentioned earlier, we already have a carrier neutral, and independent national exchange point, called **National Internet Exchange of India (NIXI)** operational since 2003, in that light, we are of the opinion that another body should not be created.

Moreover, as it is a not for profit body and does not have any vested interest, NIXI has been working as a neutral body protecting all its members interest. NIXI is fully operational and is efficiently routing the domestic internet traffic which is currently around 12.5Gb/s. Any ISP can join as a member and currently there are 35 ISPs who are members of NIXI. Apart from that any neutral associations like CCAOI can associate members of the organization. Since 2005 NIXI has also been maintaining the .in Registry and is also planning to set up the **National Internet registry (NIR)** shortly.

Thanking you and looking forward to a favorable consideration of our suggestions by the Authority in the interest of the country,

Thanking You.

Yours very truly,
On behalf of **CCAIO**

A handwritten signature in blue ink, appearing to read 'Amrita', with a horizontal line extending to the right.

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