

Aircel/TRAI/Corr/2015/186

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Shri Arvind Kumar
Advisor (Network, Spectrum & Licensing)
Telecom Regulatory Authority of India
MTNL Telephone Exchange Building
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi – 110 002

Sub: Aircel Group Response to TRAI Consultation Note on "IP Based Interconnection".

Dear Sir,

This is with reference to TRAI Consultation Note on IP Based Interconnection dated 27th Nov'2015.

In this regard, please find attached our response to the above mentioned Consultation Note. We have also sent scan copy of our response through email at fn@trai.gov.in;

We hope TRAI will take our inputs into consideration.

Yours Sincerely
For Aircel Limited & Dishnet Wireless Limited



Ramesh K
Assistant Vice President – Corporate Regulatory Affairs

Encl: As stated above

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Aircel Group Response to TRAI Consultation Note on IP based Interconnection

At the outset, we support enabling telecom licensees by allowing interconnection of the IP based networks. In this regard, we would like to draw the attention towards our submission dated 19.8.2014 made to the TRAI's earlier consultation paper on Migration to IP based Networks. Vide the above-said submissions we have highlighted various concerns which have to be addressed while formulating licensing regime for the IP based interconnection.

The key points raised in our said response dated 19.8.2014 are reproduced below for ready reference.

1. IP interconnection should not be mandated but, only facilitated and promoted.
2. IUC framework to continue and IUC billing to be done on 'per minute' basis only like the retail tariffing.
3. No QoS benchmarks to be framed for IP interconnection for initial few years, to uplift & promote conversion to IP based interconnection.

On the consultation note floated by TRAI, we have following observations to make:

1. **Selective issue being dealt:** It has been observed that TRAI has chosen to address only the licensing concern without transparently providing details on the decision/recommendation arrived at against rest of the concerns. We most humbly request TRAI that our submissions and all the issues related to IP interconnection should be dealt collectively and transparently taking all the stakeholders together.
2. **Specific verbatim for other licenses not mentioned:** TRAI has proposed the amendment for the Unified License and stated that 'similar amendment to this effect is also proposed in relevant clause in other license agreements'. We request TRAI to explicitly share the verbatim proposed to be incorporated in the UASL/CMTS licensees as well, for comments from UASL/CMTS licensees.
3. **License amendment does not clearly specify whether the IP based interconnection is mandatory or optional.** Ideally, the license amendment should clearly specify that the IP interconnection is optional and should only be opted for in case both the parties explicitly agree. Such unclear amendment has the potential to create confusion & complexities and thus, inter operator disputes in future.

There could be a future scenario for example that one of the new operator prefers only IP based interconnection and in pursuance creates hurdles in provision of additional POI/E1s for other operator's outgoing traffic, after two year of seeker period. Thus, for giving stability and



robustness to the interconnection regime, the license amendment should clearly specify that TDM interconnection would be mandatory and IP based interconnection would only be optional, in case both the parties agree. This can be reviewed at a later date as and once IP interconnection flourishes.

4. **Regulation on IP interconnection charges:** In the consultation note, the TRAI has cited DoT's letter no 20-281/2010-AS-I Vol.9, dated 10.11.2015 regarding 'Regulation of IP interconnection charges'. Considering this, it is imperative that TRAI firstly confirms its recommendations/regulations on the IP interconnection charges. In interests of transparency, we request that the said letter of DoT be shared, as has been the practice being followed by TRAI in almost all consultations wherein the DoT letter is annexed with the consultation paper.

Final Submissions:

Considering above submissions, we most humbly request TRAI as per following:

1. TRAI should share the clear and unambiguous proposed amendments for UASL & CMTS licensees as well.
2. TRAI should clearly specify in the proposed License amendment that IP interconnection is optional only and it would be mandatory to have TDM interconnection even if one of the interconnecting parties disagrees.
3. Before making final view, TRAI should share its recommendations on other aspects of IP interconnection including IUC and give an opportunity to operators to give their views on all concerned areas.
4. Before making their final views, TRAI should transparently share the above-said DoT letter dated 10.11.2015 and/or any other relevant reference on the issue, and give opportunity to the operators to give their supplementary views.

