

## Comments on VMS/AUDIOTEX/UMS License

- 1.) NO, we think there is no need for standalone separate license for voice mail service, as Audio Text License is good as it is with /VMS/Audiotex/UMS. There are very less number of providers who provide the VMS services. The number of wireless subscribers is 103363 million and wire linesubscribers is 25.22 million , if remaining 25.22 million customers one also a huge quantity of customers and we not able to ignore these no. of customers, if they require there retrieval of message then they use these VMS providers. There is huge untapped market of Audio Text license as Value added Service is not fully grown in India till now and for need based customized service we think separate Audio Text license can perform better.
- 2.) As per us there is need of revised technical specifications it is mentioned in GR no. SR/VMS-01/03 MAY 2003. Whether Audio Text license remains separate or it is merged with VMS/UMS we think interconnectivity between PRI, Internet and MPLS system should be allowed in India also as being done in foreign countries. Then the market of Audio Text work will grow immensely. Specification for servers, data centres may be clearly defined as per market trend.
- 3.) As per our view, there is need to continue with separate standalone license for Audio Text Service services. These Audio Text companies provide information through automatic IVR system takes IVR services from any provider and customers of these agencies gets their information of gas, travel time etc.As per our observation most of the Audiotex license provides the audio conferencing services. Value added service is provided to client through Audio conferencing.
- 4.) Technical specifications for the Audiotex is fine as per TEC specification no. SR/ATS-01/02. MAY 2003.However we recommend some changes in technical specifications for Audiotex. Interconnectivity between PRI, Internet leased line and MPLS services as a lot of changes have taken place in telecom field and we should act in synchronization with foreign countries. Merely denying these services in name of Security concerns is not in the interest of growth of Value added service. Similarly updated specification about Servers, Protocol, Data Centres, and SLA etc. may be defined so that the sector progresses smoothly.

There should be only Registration for Audio Text Services and it should be on All India Basis as we are only content provider and value added service provider. This sector cannot afford License as then Entry Fee, Bank Guarantee, FBG etc come into picture which cannot be afforded by these start-up companies.

- 5.) Yes, there is need for standalone license for providing Audio conferencing Services, but instead of including it in optional additional facilities it needs to include in core services of Audiotex. As we observed that lot of Audiotex licensee provides only Audio conferencing services. The technical specification needs to clearly defined, like servers with which protocols and specification, SLA mentioned clearly. Yes we agree that the technical specifications need to be explicitly defined.
- 6.) The technical specifications for Audio Conferencing services is already defined by TEC with GR no. TEC/SR/SA/ACS-001/01/MAR-09 .we done some testing with technical specifications

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in GR of ACS in our network and report is submitted to TEC with application no. TEC-00000617 .when we go on next phase and if it requires by TRAI then they will get it with TEC Application no. TEC-00000617 dated 27.08.2013. For Audio Text companies there should be REGISTRATION like OSP so that these companies get registration and start value added services so that telecom sector growth is pushed upside. It should be on all India basis and SDCA wise license is not proper for its growth as in present day marketing and selling of services is very difficult and sector should not be forced to be confined to SDCA or Circle only. PRI lines are for inbound and we cannot control whether client is calling from within SDCA or outside SDCA. The problems of Audio Text licensee should be addressed in new specifications.

There should not be any effort by govt for entry FEE, BG and AGR for this sector as we are utilizing access services / data service providers and only making VALUE ADDITION. That way we are already helping access /data service providers in the market for PRI, Internet leased line, MPLS etc.

- 7.) There is no requirement of standalone Unified messaging service. We think that both licensee need to allow the services i.e. UMS licensee and ISP licensee. ISP licensee should concentrate on providing data service to Audio Text Licensee/UMS licensee and better Value addition / data service can be provided by Audio Text companies as these companies can reach to clients and provide customized services at Micro Level
- 8.) There is no need for any technical specifications need to be revised, the specifications are fine enough as mentioned in GR – GR/UMS-01/01.Aug2000. However if any modifications is initiated then our comments at S. No 4 and S. No 6 may be taken into consideration
- 9.) In TRAI paper of 2009 and 2012 it is written that VMS/Audiotex/UMS is VAS Service (value added services) for Content Provider. So we are already paying for Telecom resources and no fresh license is needed. It should not be in UL as License fee, large BG etc. will be required then and Audio Text companies are of small net worth and are working for start-up India. Introduction of license fee, large BG, AGR etc will be detrimental to growth of this sector. One time registration fee should be there and preferably allowed to operate on ALL INDIA basis with Interconnectivity among telecom resources.
- 10.) Yes the service area may be similar to the service area of ISP (National, Metros) to bring Uniformity among the service area .Preferably it should be on all India basis and only Registration should be sufficient. Currently all the licensee are confused, they provide the services in just their SSA and Outside the SSA as well. There is a clause that “From outside the SDCA, the service will be allowed to be accessed on STD call basis .We suggest it needs to clearly defined all of the details regarding providing of services and service accessed by all region or any particular SSA where license is granted. Our genuine problems over the years may be addressed in new policy. Otherwise we are getting harassed by security agencies like TERM Cell DOT.
  - (a)There is no mention of ISD Calls?
  - (b)There is no clarification it need to be sell in SDCA or outside the SDCA.

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- 11.) It should not be in UL as licensee fee, Entry fee, AGR etc. payment is not desired in Audio text licensee as this is content service only. We are providing Value added service and we are users of services offered by Access Service/ Data service providers. This was also spirit and understanding of Dept of Telecom when Audio text license was provided initially and we should not deviate in the direction where Audio Text Service/ UMS services sector is damaged.
- 12.) There should be no requirement for minimum net worth and minimum equity for Voicemail/Audiotex/UMS authorisation under Unified license. If still govt is bent upon this requirement then Rs 50 Lac net worth should be enough.
- 13.) This should not be in UL as licensee fee, entry fee, AGR etc. payment is not desired in Audio text licensee as this is content service only.
- 14.) There should be no AGR as VMS/Audiotex/UMS is only content service as this is purely Value added service. We are providing Vat, service tax etc. to govt and this should be enough for the growth of this sector.
- 15.) Audio text licensee was given in by Govt of India through Dept of Telecom with the condition that there will be no entry fee, PBG and any financial BG. Hence either do not allow these conditions or include nominal amount as Entry Fee, PBG, FBG, License Fee etc. in few lacs only because Audio Text services can be better provided by new start-up companies at micro level and govt should remove impediments in the growth of this sector rather than pulling off legs of these companies. So migration should be smooth and there should not be a large financial burden imposed on existing companies
- 16.) Agreed. We think it is fine with 15 years and after that they increase it to 5 years more.
- 17.) We recommend that terms and conditions as VMS/Audiotex/UMS is Content service (value added services) for migration to Unified License should be so carefully drafted that all existing companies in Audio text license migrate to new regime willingly without any extra financial burden. Also there should be so much incentive in the proposal that new companies show eagerness and enthusiasm for getting this license so that Value added sector is boosted up.
- 18.) The existing VMS/Audiotex/UMS services licensees may be allowed to continue it. If migration is essential then draft the conditions as favourable to the existing players of Audio Text licensee.
- 19.) Audiotex licensee was given in year with the condition that there will be no entry fee, PBG and any financial BG. This spirit should be maintained in new policy. These should be NOMINAL if essential.

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20.) Audio text licensee holders are new budding operators. TEC GR 2009 says for merger IP and MPLS and PSTN interconnections .Audio text should be not under license rather it should be registered as OSP and only registration of Audio Text Company is desired for overall growth of this industry.

Presently we are getting so many letters from security agencies like TERM Cell that we think we are getting harassed. So there should not be any ambiguity in rules for Audio Text service.

Regards

Asergis Telecom Services Pvt. Ltd.