

Ref No: RP/TRAI/FY15-16/087/068

December 21, 2015

Sh. Arvind Kumar
(Advisor, NSL-I)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi-110 002

Ref : TRAI Consultation Paper No. 7/2015 dated 27th November 2015.

Subject : IP based Interconnection

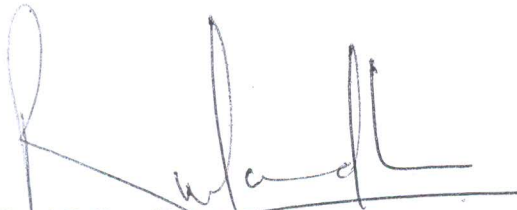
Dear Sir,

This is in reference to TRAI's consultation paper on "IP based interconnection" dated 27.11.2015.

In this regard, we hereby enclose our counter-comments on the above mentioned Consultation paper, as Annexure - I.

We request TRAI to take cognizance of our counter comments.

Thanking You
Yours Sincerely
For Bharti Airtel Limited



Ravi P Gandhi
Chief Regulatory Officer

Against the responses of various stakeholders, we would like to submit our counter comments as follows:

1. Submission of RJIO:

- (i) Where both TSPs are IP based, IP Interconnection should be mandated immediately to be implemented within 6 months.
- (ii) TRAI can determine a phased migration to mandatory IP regime wherein if one TSP demands IP Interconnection it must be provided.
- (iii) Where one TSP is TDM and the other is IP, the TDM TSP has to bear the cost of conversion to IP.

➤ **Airtel Counter comment**

- **At the cost of reiteration, we state that there should not be any mandate on technology even for interconnection** and the decision of technology should be left to bilateral agreements between licensed TSPs. Therefore, any mandate for IP interconnection is not warranted inter-alia for the following reasons:
 - (i) The TSPs have invested huge amounts in the existing in the existing TDM networks and any forced migration to IP based interconnection would usurp existing investments and require the TSPs to make fresh investments.
 - (ii) Since the cost of interconnection is borne by the Seeker under the extant interconnection framework, therefore, the cost of any change in the provider's network occasioned while accommodating interconnection on the technology insisted by seeker, the principle should continue as per the prevailing interconnection regime.
 - (iii) Most TSPs are presently TDM TSPs and if the TDM TSP is now mandated to bear the entire cost of conversion to IP when the IP TSP seeks interconnection, such mandate would tantamount to TDM TSP being laden with unwarranted costs and exposure to business adversities.
 - (iv) Any mandate on IP based interconnection will disturb and interfere with the technology neutral essence of the License Agreement.