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Ref: Webex India response to TRAI's consultation paper on the Framework for Service Authorisations under the Telecommunications Act, 2023 (No. 7 of 2024)

Dear Sir,

M/s. Webex Communications India Private Limited, subsidiary of Cisco Inc., is holding UL Access and UL VNO license granted by Department of Telecommunications.

We submit our response to the TRAI consultation paper referenced above, and we hope the Authority shall find it useful in formulating its recommendations on the subject.

We would be happy to provide clarifications to any queries you may have.

Yours sincerely,

A handwritten signature in blue ink, appearing to be "MK", with a horizontal line underneath.

Harish Krishnan

Webex India Response to TRAI Consultation Paper on Framework for Service Authorisations under the Telecommunications Act, 2023 (No. 7 of 2024)

Executive Summary

The present licensing regime has ushered in tremendous growth in the telecommunication sector in India and helped in bridging the digital divide. The Telecommunications Act 2023 is a step in the right direction, we put forth our response with a forward-looking approach.

1. Convergence under NDCP 2018

The Government of India announced the National Digital Communication Policy (NDCP) 2018. One of the strategies of the NDCP 2018 is '*reforming the licencing and regulatory regime to catalyse Investments and Innovation and promote Ease of Doing Business*'. Under the Enabling Infrastructure Convergence of IT, telecom and broadcasting, it mentions the following strategy namely '*iii. Restructuring of legal, licensing and regulatory frameworks for reaping the benefits of convergence and iv. Allowing benefits of convergence in areas such as IP-PSTN switching.*' "

The traditional circuit switched networks have IP at the core and all media is transported using TCP-IP protocols. The UL Access service scope of service permits IP-PSTN mixing "*While providing Internet Telephony service, the Licensee may interconnect Internet Telephony network with PSTN/PLMN/GMPCS network.*" However, the UL(VNO) Access service scope is restrictive, it allows IP-PSTN mixing in NSO network. This puts artificial restriction on the scope of VNO licensee and virtually make it un-usable to those who wish to provide Cloud based communication service providers (CSPs).

2. Use Case of Converged service providers

The CSPs are in the business of providing communication services to Contact Centers, Global Capability Centers, Global and local clients with offices spread across geographies and networks. They wish to make the full use of convergence of networks and services wherein a customer is able to call a PSTN number and be connected to a knowledge worker using a computer, laptop, tab or any other IP based device.

The second application of such converged services is the usage of modern Collaboration Tools wherein team members across various office locations and networks meet, share documents, presentations, videos. Other team members can also dial-in using their PSTN or Mobile number to join the meeting.

Another application is a business phones scenario, wherein the PSTN numbers or Internet Telephony numbers are allocated to positions rather than individuals. The customer dials the PSTN / Internet Telephony number and assisted calling solution directs the call to the relevant technical expert / sales manager / relationship manager as the case may be.

3. Application service providers (CSPs)

The current licensing regime envisages two types of service providers namely the NSO and VNO. However, there is another class of service providers who do not build telecommunication network or seek numbering resources from the DoT.

The Application CSPs plan to procure all telecom resources from the licensed Telecom Service Providers (TSP). They deploy equipment in the Data Centre located in India, integrate with the TSPs, procure telecom resources from the TSPs and provide application services to the enterprise customers.

It is necessary to develop opinion and provide guidance in relationship to existing and prospective licensing regimes for Applications Services Providers. Examples are SaaS & UCaaS service providers.

4. New Authorisation under the Telecommunications Act 2023

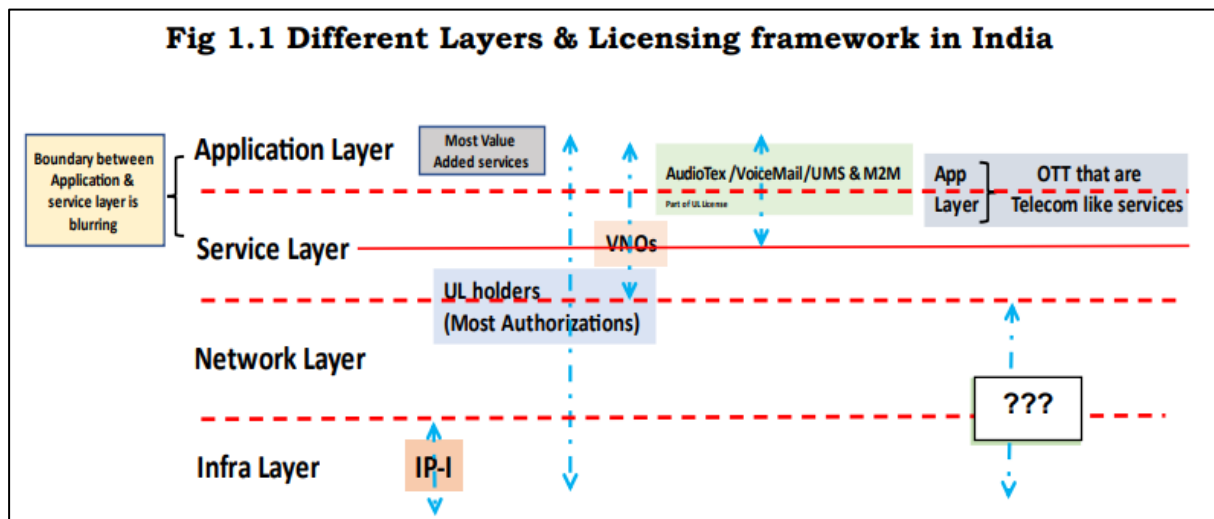
The TRAI consultation paper envisages four types of networks namely Public network, non-Public network, Captive network and Non-captive network on page 26-27. The paper also provides the definition of *Public telecommunication service and non-Public telecommunication service*.

We recommend that the definition of Public telecommunication service and Captive network should be defined, all other flavours of services should be left open with obligations of consumer welfare, tariff regulations, QoS.

Public telecommunication service – ability to make and receive national/international calls, message, data. This service should be available to public, the services should be interoperable across networks and access to Emergency services.

Captive network – a walled garden network not connected to Public telecommunication services

Application layer	Application Service Provider with facility to procure telecom resources from license TSPs and integrate with all TSPs/ NSOs
Services layer	UL(VNO)
Network layer	UL



In view of the above, we recommend that the Authority should recommend a unified communication authorisation (refer our detailed response under Q5) with pan-India jurisdiction.

- ▶ The new authorisation should enable those service providers who do not plan to build core network infrastructure. They wish to procure telecom resources from providers of PSTN, PLMN, Internet Telephony meaning licensed TSPs in India.
- ▶ This new authorisation should be made attractive to all startups, technology companies and value added service providers with nominal entry fee.

- ▶ This new authorisation should not have core network , lawful intercept and remote access approval related terms and conditions as they are in the domain on Application services.

Webex response to the TRAI Consultation Paper on the Framework for Service Authorisations to be Granted Under the Telecommunications Act, 2023

Q1. For the purpose of granting authorisations under Section 3(1) of the Telecommunications Act, 2023, whether the Central Government should issue an authorisation to the applicant entity, as is the international practice in several countries, in place of the extant practice of the Central Government entering into a license agreement with the applicant entity? In such a case, whether any safeguards are required to protect the reasonable interests of authorized entities? Kindly provide a detailed response with justifications.

Webex response :

We are generally in favour of Authorisation (2-3 pages) with details such as authorisation number, date of issue, name of licensee company, Scope of service (name only), network type (name only), area of operation, duration of license and reference to Telecom Rule. We provide below a template for the Authorisation document in **bold**, the other sections are indicative for the sake of completeness.

Table 1 : Template of Authorisation (our recommendation)			
1	Authorisation no and Date of issue		
2	Name of licensee, registered address, authorised signatory etc.		
3	Scope of service	Mobile service	n/a
		Fixed service	n/a
		Internet service	n/a
		Bandwidth service (national, international)	n/a
		Cloud communication Service	Yes
		Etc.	Yes / No
4	Network type	Core, transmission, access network (as in UL)	n/a
		Transmission network (as in UL)	n/a
		Some elements of network (as in UL-VNO)	n/a
		Cloud infrastructure and service delivery platform (Application services)	Yes
5	Area of operations	SDCA	n/a
		Service area	n/a

		National service area	Yes
6	Duration of license	20 years	
7	Terms and conditions	Refer detailed Telecom Rules on the DoT website	

Q3. In case it is decided to implement the authorisation structure as proposed in the Q2 above,

(a) Which essential aspects of authorisation should be included in authorisation documents?

(b) What should be the broad category of rules, under which, terms and conditions of various authorisations could be prescribed?

(c) Whether it would be appropriate to incorporate the information currently provided through the extant Guidelines for Grant of Unified License and Unified License for VNO, which included, inter-alia, the information on the application process for the license, eligibility conditions for obtaining the license, conditions for transfer/ Merger of the license etc., in the General Rules under the Telecommunications Act, 2023?

(d) **What could be the broad topics for which the conditions may be required to be prescribed in the form of guidelines under the respective rules?**

Kindly provide a detailed response with justifications.

Webex response :

We draw the attention of the Authority to the Section 3(2) of the Telecommunications Act, 2023 provides as below:

“(2) The Central Government may while making rules under sub-section (1) provide for different terms and conditions of authorisation for different types of telecommunication services, telecommunication networks and radio equipment.”

We concur with the above, and we recommend that the terms and conditions should apply to the type of telecommunication services. The conditions that are applicable for a full-fledged network operator, a VNO operator and an Application service provider should be clearly demarcated in tabular form.

For example the following conditions are not suitable for Application service provider.

Network conditions

- Emergency services
- Location based services
- EMF norms
- Lawful intercept and monitoring

Security condition

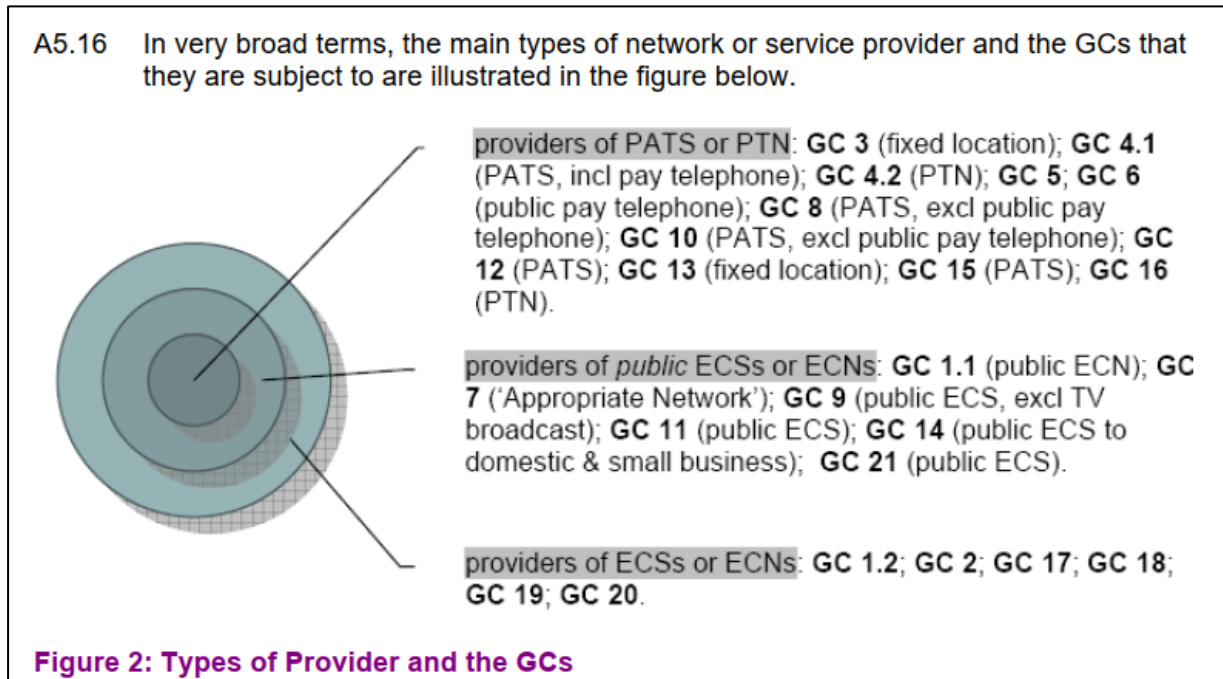
- Security clearance of personnel and equipment
- Remote access approval for access of India network from foreign location

Consumer (not applicable for Enterprise customers)

- Directory services
- Number portability
- Verifiable biometrics identification

- Customer database on website

As a regulatory best practice, we reproduce the table from OFCOM, which clearly demarcates the conditions applicable to PATS, public ECS/ ECN and ECS/ECN. This brings certainty in implementation of regulations and increase the overall compliance level.



- GC – General Conditions of Entitlement
- PATS – Public Available Telephony Service
- ECS – Electronic Communications Service
- ECN – Electronic Communications Network

Q5. In addition to the service-specific authorisations at service area level, whether there is a need for introducing a **unified service authorisation at National level** for the provision of end-to-end telecommunication services with pan-India service area under the Telecommunications Act, 2023? Kindly justify your response.

Webex response :

There is a dire need for Unified Service Authorisation with pan-India jurisdiction for provision of end to end services to consumers. We wish to clarify that our response below is in view of **Application Services only**.

- Simplification in licensing** - The cloud services market in India is witnessing exponential growth, driven by the rising adoption of Unified Communications as a Service (UCaaS). The services are hosted in a centralized data center and services are provided to any customer.
- Rapid deployment** - As the market dynamics is ever evolving so should be the scope to expand the services on offer.
- Evolution of services** - in addition to service specific authorisation a **unified service authorisation at National level is essential** to encourage players the benefit of emerging trends and ever-changing demand landscape.

- ❑ **Scope of service** - The scope should encompass all the services currently permissible under service specific authorisation and have a lighter compliance obligation in view of ease of doing business.
- ❑ **Regulatory compliance** – The regulatory obligations should be commensurate with the network (or not network) deployment. Details provided in response to Q3.

Q18: In view of the provisions of the Telecommunications Act, 2023 and technological/ market developments what changes (additions, deletions, and modifications) are required to be incorporated in the Unified License?

Q19: In view of the provisions of the Telecommunications Act, 2023 and technological/ market developments, what changes (additions, deletions, and modifications) are required to be incorporated in the Unified License for VNO?

Webex response :

The existing VNO license has certain conditions that restrict its usage by startups, technology companies, cloud-based communication service providers.

The following modifications are required to be incorporated in the extant scope of Access Service under UL and VNO license-

❑ **Lawful Interception and Monitoring under UL Access Service –**

- There are few licensees that may operate under UL Access Service authorisation, however they do not intend to seek numbering resources from DoT. They plan to procure numbering resources from the licensed TSPs. Such licensees may be exempt from LIM obligations as the traffic is monitored in upstream network.

❑ **Migration from UL to VNO and vice-a-versa –**

- Reference is drawn to the Fig 1.1 on page 3 of our response, this diagram is reproduced from the TRAI recommendation.
- In the absence to regulatory clarity, few service providers have obtained VNO license. They should be permitted to migrate from VNO Access → UL Access. The additional entry fee may be levied upon such migration.
- In the absence to regulatory clarity, few service providers have obtained UL license. They should be permitted to migrate from UL Access → VNO Access. The excess entry fee may be refunded upon migration.

❑ **Multi-Parenting of VNOs with NSOs for PSTN Services –**

- Multi-parenting enables VNOs to dynamically select the best performing network routes, ensuring optimal service levels.
- It also enable extending the geographical reach of VNOs by allowing them to provide services in areas where a single NSO might not have adequate coverage. This expanded reach is crucial for addressing the diverse needs of urban and rural customers.

- Redundancy provided by multiple NSOs ensures that network disruptions in one NSO do not impact overall service delivery, thereby maintaining a high standard of service continuity.

❑ Integration of IP-PSTN in VNO Networks

- Enabling VNOs to integrate IP and PSTN networks allows cloud service providers to develop innovative products that seamlessly blend traditional telephony with modern IP-based services.
- This integration is essential for delivering advanced UCaaS solutions that encompass voice, video, messaging, and other communication services on a unified platform.

Q20. Whether the Access Service VNOs should be permitted to parent with multiple NSOs holding Access Service authorisation for providing wireless access service?

Webex response :

We submit our response below in for Application Services only.

The VNOs plan to procure numbering resources meaning from license TSPs. They integrate with all available TSPs for these services based on mutually negotiable terms and conditions. Such VNOs should be permitted to parent to multiple NSOs.

The detailed justification is as below.

- ❑ As stated in above response multi-parenting enables VNOs to dynamically select the best performing network routes, ensuring optimal service levels.
- ❑ It also enable extending the geographical reach of VNOs by allowing them to provide services in areas where a single NSO might not have adequate coverage. This expanded reach is crucial for addressing the diverse needs of urban and rural customers.
- ❑ Redundancy provided by multiple NSOs ensures that network disruptions in one NSO do not impact overall service delivery, thereby maintaining a high standard of service continuity.
- ❑ By leveraging connectivity with multiple NSOs, VNOs can optimize network routes, reducing latency and improving overall service quality. This capability is instrumental in delivering superior user experiences, which are critical in a highly competitive market.
- ❑ High availability and reliability are critical for cloud service providers to meet stringent Service Level Agreements (SLAs). Multi-parenting with multiple NSOs allows cloud service providers to offer robust and resilient services, which are essential for critical enterprise applications like Unified Communications as a Service (UCaaS) and global contact centres.

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