

**Annexure-I**  
**OSPAI's response to TRAI consultation paper on**  
**"Ease of Doing Telecom Business in India" dated 14.3.2017**

We welcome the opportunity to submit our comments on the Consultation Paper on "**Ease of Doing Telecom Business in India**" by Telecom Regulatory Authority of India (TRAI). The top priority work items for unhindered growth of the BPO/ITeS sector who operate under the Other Service Providers (OSP) Guidelines issued by DoT the following are requested.

**OSP to OSP connectivity to OSPs providing similar services to meet the industry demand for Third Party Outsourcing.** It is requested that the restrictions imposed by Clause 4(2) of Chapter-III of OSP Guidelines allowing interconnection of two or more international OSP of the same company or the group companies only be removed. If such restrictions are removed we may be able to help small and medium entrepreneurs even in villages and Tier-II, Tier-III cities and villages.

**Sharing of Phone and Data Infrastructure (LAN & WAN) by OSP:** Clarify/permit sharing of Network Infrastructure i.e. LAN & WAN by OSP's for their ICC/DCC & Corporate office use with logical partition on their single EPABX or separate EPABX's.

**Connectivity from Client owned IT Environment and EPABX:** It is permitted for client to extend their IT (Data and Voice) environment to an OSP site. Global customers prefer extending their infrastructure to outsourced partner so as to maintain quality and control of voice/data traffic. It also provided them with the ability to have a single view/report on performance of outsourced partners i.e. OSP's in India

**Allow use of Centralised IP PBX's in India:** Permit use of Centralized IP PBX,s by organizations for normal & OSP use. (i) Senario-1: PBX LOCATED WITHIN India (ii) Scenario-2: PBX located outside India. IP Technology allows use of a centralized PBX. International connectivity and Infrastructure can be maintained centrally.

**Data and Voice connectivity between OSP & International, Global Clients office/PoP in India:** Permit Voice and Data connectivity between OSP center and international client's office/PoP in India (to leverage clients WAN infrastructure). There is a cost advantage as existing bandwidth (from Clients India office/PoP) can be used & it eliminates the need new redundant links between the OSP center and clients office/PoP outside India. Stringent SLA driven due to global contracts.

**Use of Managed Voice Services such as VcIPLC (Variable Charge International Private Leased Circuit), MBIC (Minute Based IPLC Circuits), VpIP over MPLS on Pay-Per-Use model offered by authorized telecom service providers in India:** Issue circular that OSP's can use these services or notify all TERM Cells not to block usage of these services. The service is offered under the IPLC license agreement by authorized service providers. There is no toll by-pass. Per minute charges are being paid to the telecom service provider. Switching of calls happens outside India. No PSTN connectivity at the India end. PSTN connectivity on foreign end is offered having facility of outbound calling.

**Usage of Internet & Internet Telephony services to transport ICC calls:** Permit ICC's to use Internet & Internet Telephony Services as a medium to transport Inbound & Outbound calls. Internet should be treated as another medium (similar to MPLS, IPLC, etc.) to transport call traffic (inbound & Outbound). Internet is currently used by organizations to connect to their clients for data connectivity.

**Internet access from ISP in India:** Counter intuitive when out network connectivity is to a global network hub and data center in another region. There is additional cost of setting up a datacenter in another region. There is additional cost of setting up an internet access infrastructure with full security layer in country when we as a global bank can leverage on our global internet proxy based outside India.

**Centralised IVR and DCC:** Permit DCC to deploy centralized and shared IVR at its Datacenter/OSP Center, call received to it over Toll Free number / Toll number, after processing as per IVR tree, can be routed to the agents at remote DCC center over MPLS/Point to Point link by logging into centralized PBX/ACD at DCC Center.

**Free Flow of Data across borders:** Request that there should not be any mandate which restrict free flow of data across borders or mandates any sort of server of data localisation.

**Centralized IVR/PBX/ACD at Client Datacenter – a NON OSP Location:** Client may deploy IVR/PBX/ACD at its datacenter a Non OSP location within India as centralized IVR, call received to it over Toll Free Number / Toll Number, after processing as per IVR tree, can be assessed by agents at remote OSP location over MPLS/Point to Point.

**Permit higher bit Encryption:** The present bit of Encryption is insufficient for doing fast and smooth and business operations in India. Request to enhance the current bit of encryption to international standards.

**Application Services:** Application Services using Telecom Resources for Voice traffic including VoIP only. There is no registration required for the Application Services involving Data only. There is no registration required for the Application Services in respect of domestic Captive Call Centers.

Registration shall be done through on line portal only. If application has not been rejected / asked for additional information within 10 days, it will be deemed to be registered with issuance of registration number from the system. Single OSP registration for one company (no location specific), with the TERM cell where the registered office is located with details of multiple operational locations (if any). Changes shall be notified on time to time.

#### **Merger and Acquisition Guidelines:**

**Merger and Acquisition Guidelines with latest inputs:** The Merger and Acquisition guidelines was not fully incorporated in OSP Guidelines. The procedure which is already in operation is not incorporated in Online Registration Portal and there is a lot of hardship to complete the Registration process and documentation procedures. At present fresh registration is required for the mergers and amalgamations.

Support for the collaborative, self-regulatory initiatives among industry stakeholders in areas where regulatory action may be justified, use of light touch, flexible, well co-ordinated regime that protects innovation and facilitates rapid cloud market developments.

We request to incorporate OSPAI's views on subjects mentioned in the document. The licence process should be simplified and combined to the extent possible to economise by identifying the bottlenecks, obstacles or hindrances that are making it difficult to do business in India by regulatory intervention.

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