

Ozonetel Counter Comments on the TRAI Consultation Paper No.12/2016 Consultation Paper on Review of Voice Mail/Audiotex/Unified Messaging Services.

Introduction:

At the outset we thank TRAI for coming up with Paper on “**Review of Voice Mail /Audiotex /Unified Messaging Services Licence**”.
Need for review of licensing aspect of the Voice Mail /Audiotex /Unified Messaging Services:

Before attempting to provide the query by query counter comments, we wish to set right the record on the core framework of resistance to the Hosted Telephony industry segment by the COAI as under:

Point Made by COAI in its preamble of the comments section	Ozonetel clarification points
<p>The decision on licensing aspect of the Voice Mail /Audiotex /Unified Messaging Services was the need of the hour considering the recent incidences wherein certain new calling Apps and also some of the existing Voice Mail /Audiotex /Unified Messaging Services licensees are violating the Indian Telegraph Act and offering services without a license or are violating some of the key terms & conditions of the Voice Mail /Audiotex /Unified Messaging Services licence</p>	<p>The fundamental point to be understood is that these services are in the nature of application services and are not in the nature of core Telecom carriage or access services that would require a licensing framework.</p> <p>The core regulatory restrictions are meant to ensure that there shall be</p> <ol style="list-style-type: none"> 1. No Toll By-pass, 2. No public VOIP/PSTN voice integration and 3. No number masking, <p>All the above are strictly honoured by this industry without any violation whatsoever.</p> <p>Rendering innovative application and content based services on the licensed networks of the Telcos should not require any further licensing in the first place.</p> <p>Else, If this licensing requirement logic were to be stretched to cover all types of Telecom applications and usage, then every subscriber of any</p>

	<p>Telecom circuit also would need to be brought under an extended licensing regime, which is just not only impractical but also, unwarranted in any dimension.</p>
<p>Exploiting the arbitrage: The modus operandi of these entities is that when a customer initiated a voice call through the said calling app, system captured both the calling and the called party number. This information is used to generate two simultaneous and distinct calls, one for the Called number and another for the Calling number, after which these calls are then conferenced. It is apparent that the infrastructure of these entities is based on fixed line services from one operator as it provided these entities the benefit of nil termination charges to offer calls at much cheaper rates than the rates offered for voice calls by Mobile telecom service providers.</p>	<p>There is no exploitation of any arbitrage in these services. Initiating two independent calls based on either automatically triggered or manually triggered calls, as per the business logic of the end user is no way a violation of any extant rules or regulations. Call conferencing is a simple facility that is very widely being used by every retail subscriber as well. All these calls are anyways made from the Licensed Telecom operators networks and all the termination charges are anyways paid as per the licensing norms of the operator, whose lines are being used for the said service.</p> <p>Further the assumption that these calls can be offered at much cheaper rates is just not possible as both the calls are paid calls.</p> <p>Further TRAI has since started a fresh consultation process to rationalize the IUC regime to further nullify any anomalies that were resulted as a result of land line service providers having been facilitated to connect to any other network without any IUC charges.</p> <p>The very fact that ISDN PRIs facilitate better CTI capabilities is the reason, why these platforms prefer and deploy the ISDN PRIs/ SIP trunks on the platforms than anything else. The Fixed Service Lines are not being deployed with any malafied intention only to facilitate avoidance of the payment of termination charges to mobile networks by the Fixed Line Service Providers. This is an incorrect assumption. This is more a technology preference and nothing else. This is not meant to leverage on any regulatory arbitrage.</p> <p>The cost of two calls is always more than cost of one call and hence this very assumption that these calls are cheaper does not stand the test of any empirical scrutiny. This is just an assumption that would stifle innovation in this domain.</p>

<p>Revenue loss to TSPs: These entities are also converting an outgoing call into an incoming call and therefore, depriving the access operators of their legitimate call charges and thus causing huge revenue loss to access operators which ultimately is resulting in lesser payout to exchequer in the form of reduced license fee on revenues.</p> <p>Further, these type of Apps use fixed line/PRIs to outcall both calling and called customers hence even the payment of termination charge is also avoided.</p>	<p>The principle is not properly explained by the author of this comment. When there are two calls made from the platform of these hosted Telephony players, the call recipients at both ends receive, two independent outgoing calls triggered from the hosted Telephony application platform. When both these calls are being paid to the Telco whose lines are used to fire these calls, there is absolutely no question of any revenue loss to the TSP whose lines are used to fire these calls. The IUC waiver for calls from Fixed Line services to other mobile networks was a regulatory decision in Feb 15 as a part of the progressive IUC rationalization process.</p> <p>The businesses and the consumer market shall decide the best way to deploy their Telephony which best serves their business growth than anything else. When end users desire to receive incoming calls than making outbound calls, and markets are in favour of the same, the facilitating technologies should not be artificially constrained for the same. Even otherwise it is the duty of The Telecom service providers not to control the incoming call flows of any Telecom voice service subscriber irrespective of the incoming call volumes.</p> <p>In fact, what should have been just one call otherwise is converted into two calls with a better tracking of all the calls across all stakeholders. Better call tracking and ensuring that all abandoned calls are again called back, multiple calls are generated as a result, which otherwise would not even have happened, in the absence of any tracking of the same.</p> <p>These technologies are actually compensating for all such lost calls, which would not have generated any revenue to any Telco. By automated dial-back to such lost calls, the Telco voice traffic is multiplied exponentially.</p> <p>Thus the Telecom revenue is being multiplied exponentially and state exchequer is a beneficiary of this abundance. There is no revenues</p>
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	<p>loss to Telco industry in this entire operational framework, when viewed holistically.</p> <p>We once again reiterate that this point does not stand the test of any empirical scrutiny. This is just an assumption that would stifle innovation in this domain.</p>
<p>4. Violation of Audiotex Licensing terms: These entities are offering the calling services under the Audiotex License and their services are in violation of the licensing terms contained in the said License as highlighted below:</p> <p>a. These entities are offering Point to Point conferencing service which clearly is outside the ambit of Audiotex License as stated in clause 30.6 of the Audiotex License reproduced below:</p> <p><i>“30.6: Point to point conferencing and calling card facility shall not be provided by Voice Mail/Audiotex licensees.”</i></p> <p>b. This point to point conferencing is also extended by the entities to the international bridges by directly interconnecting at international locations. This activity is also ultra-vires as the Audiotex License specifies to obtain services from other telecom operators as is established by the following clauses:</p> <p><i>“2.1: The Licensee shall be permitted to provide in its area of operation Voice Mail/Audiotex/Unified Messaging Service using MTNL/BSNL/Other Licensed Private Operators Network.”</i></p> <p><i>“30.7: Dial out facility shall not be used in whatsoever manner for any illegal by pass of STD/ISD traffic of any licensed access service providers. Voice Mail/Audiotex licensee shall have to give undertaking in this regard.”</i></p>	<p>These licensing norms are long overdue for a rational review and this consultation process is to enable a fair review and revisit of this entire framework keeping in view the current Technology trends and the market needs.</p> <p>Hence these outdated provisions are long overdue to be scrapped outright.</p> <p>We hope and trust that TRAI would take a rational and realistic view of the same and would recommend the scrapping of these outdated provisions.</p> <p>The Comments of industry stalwarts like Mr. N Vittal (Ex Chief Vigilance Commissioner and Ex Telecom Commission Chairman) vindicates the same.</p>
<p>c. Acquiring /servicing customers outside the Licensed</p>	<p>These licensing norms are long overdue for a rational review and this consultation process is to enable a fair review and revisit of this entire</p>

<p>Area. As per Audiotex License,</p> <p>i. the service area has to be confined to Short Distance Charging Area (SDCA) on the basis of local dialling and</p> <p>ii. The services are restricted to be provided in the area of operation.</p> <p>The relevant clauses of Audiotex licenses are as under:</p> <p>Schedule 1</p> <p>Schedule of Service Area.</p> <p><i>“The Service Area for which this Licence is awarded is given below and shall be Short Distance Charging Area (SDCA) on the basis of local dialling.”</i>³</p> <p>As per clause ‘9’ of Annexure 1 under the head “Definitions of Terms and Expressions” the Service Area is defined as under: <i>“Service Area” defines the Short Distance Charging Area (SDCA) within which the Licensee may operate and offer the Services as given in Schedule “A”.</i></p> <p>The combined reading of the above license conditions thus, obligate upon the Audiotex Licensee to confine its subscribers/customers paying for the services within the licensed service areas.</p>	<p>framework keeping in view the current Technology trends and the market needs.</p> <p>Hence these outdated provisions are long overdue to be scrapped outright. Referring to the same time-warped and legacy dictums that have long outlived their utility need to be shelved gracefully than giving them a fresh lease of life in 2016.</p>
<p>5. Security Risk: Since the CDRs generated capture all such calls as Mobile Terminating (MT) calls from person ‘C’ (i.e. App), while the communication practically happened between person A and person B, hence it will not be possible to link these two calls together on the basis of generated CDRs to conclusively</p>	<p>These services establish a clear and indelible tracking of all conversations with proper CDRs at all points in time, even though the calls get routed through these application platforms. The same is also available with the Telecom Service Provider whose lines are used to manage these calls.</p>

<p>establish that actual conversation took place between person A and Person B. Thus, it creates a huge security threat wherein these occurrences of such calls cannot be traced back.</p>	<p>All security related checks are already available to track any call from any number to any number. So there is no security threat whatsoever. Should there be any need for any unique call audit to be done at any time all these hosted telephony service providers will always be abiding by the lawful instruction of any competent authority any time.</p> <p>Further if any additional checks and balances are required to be built, the same may be laid down, which will be scrupulously adhered to.</p>
<p>6. Other Violations by the Voice Mail/Audiotex/ Unified Messaging Services licensee:</p> <p>a. Clause 22.1 of the Audiotex License implies that if a company has taken resources / PRIs from more than one telecom service provider, the dial out facility will not be allowed:</p> <p><i>“22.1: In case Voice Mail/Audiotex/ Unified Messaging Services licensee takes resources for the operation of the services from more than one telecom service provider, the dial out facility will not be permitted. In case the resources are taken by the Voice Mail/Audiotex/ Unified Messaging Service licensee from only one service provider the dial out facility will be permissible. However, for UMS licensee the dial out facility shall not be permitted”</i></p> <p>In this regard, we would like to submit that there has been a recent instance wherein some of the Audiotex licensees were providing dial out services which is not permitted to them.</p> <p>b. Indirect routing of the traffic by some of the Licensees:</p> <p>We understand that few Audiotex licensees are offering the functionality of switching by converting national free phone traffic into international free phone traffic by indirectly routing traffic outside India. The origination charge for international free phone traffic is under forbearance and is much higher than the</p>	<p>Hence these outdated provisions are long overdue to be scrapped outright. Referring to the same time-warped and legacy dictums that have long outlived their utility need to be shelved gracefully than giving them a fresh lease of life in 2016.</p> <p>Also, we wish to confirm that there is no direct or indirect routing of any call traffic, without paying for the respective call legs, be it a local call, STD calls or an ISD call. There is no revenue loss being caused by these application service providers to either Telecom companies or to the state exchequer.</p>

<p>charge for domestic free phone services. We suspect that some of the Voice Mail/Audiotex/ Unified Messaging Services licensees are making unlawful gains by way of carrying the international traffic and masking the same as national traffic. Thus access operators are getting a much lesser share of call charge which in turn is also causing a loss to the exchequer by way of reduced license fee.</p>	
<p>7. Thus, keeping above in mind, we believe that there is need to review the license terms of the Voice Mail/Audiotex licensee license to strengthen the framework of the License. Further, stringent penalty provisions should be laid down in case of violation of licensing conditions, while providing such services.</p> <p>B. Terms and Conditions applicable for provision of Voice Mail/ Audiotex Services/UMS under the Basic Service License, Cellular Service License or UASL or UL licensee with Access Service authorization:</p> <p>1. TRAI in the Consultation paper has highlighted that there is no mention of terms and conditions applicable for provision of Voice Mail and Audiotex Services under the Basic Service License or UASL or UL licensee with Access Service authorization. The guidelines for issue of license for Voice Mail/Audiotex/Unified Messaging Services dated 16th July 2001 may not be legally enforceable on the service providers providing these services under Basic Service License, Cellular Service Licence, UASL or UL.</p> <p>2. In this regard, we would like to submit that necessary Terms and conditions with respect to the Voice Mail/ Audiotex Services/UMS need to be defined under the Basic Service License or UASL or UL licensee with Access Service</p>	<p>We wish to once again re-affirm that the Basic Service Operators, BSOs only need the Unified Licensing framework. These application and content based services are to be considered outside the BSO licensing framework for the reasons above mentioned.</p> <p>Any attempt to arbitrarily bring these application services under the unified licensing shall cause more harm waiting to happen than the perceived problem it seeks to fix.</p> <p>It is time that TRAI views these industry issues rationally keeping in view the extant regulatory treatment of similar application services in IT and ITES within the country and also by the way regulators have simplified the same abroad.</p> <p>The policies must take us into the future rather than driving us into the past, making all innovation to be dealt with a death-knell.</p>

<p>authorization, so that there is no exploitation of these services to gain any type of arbitrage.</p> <p>3. Currently, Voice Mail/ Audiotex Services/UMS can be provided under Basic, CMTS, UASL, UL (Access) while UMS can be provided by UL (ISP), ISP.</p>	
<p>Suggestions by COAI</p>	<p>Counter Comments</p>
<p>There should not be any standalone licenses for Voice mail/Audiotex/UMS services. No need for a separate standalone audio conferencing service License</p>	<p>There is an URGENT NEED to simplify this regulatory frame work by evolving suitable simplified registration / declaration process so that all desired checks and balances can be well covered while driving innovation in this space. We strongly recommend keeping these outside the UL regime without leaving any room for any ambiguity or misinterpretation.</p>
<p>Voice Mail/ Audiotex Services/UMS should be brought under the UL (Access Authorization).</p>	<p>This is a sure prescription from the BSOs to kill the innovation in the Telecom applications arena, once and for all. We strongly oppose the same for the reasons above mentioned</p>
<p>All current licensing clauses prescribing service specific conditions/prohibitions related to Audiotex Services should be incorporated in the UL (Access Services) i.e.</p> <p>Should not be allowed to give point to point conferencing and calling card facility.</p>	<p>There is an URGENT NEED to simplify this regulatory frame work by evolving suitable simplified registration / declaration process so that all desired checks and balances can be well covered while driving innovation in this space.</p> <p>We strongly oppose the same for the reasons above mentioned. All Telecom application service providers must be enabled and facilitated by regulations to innovate by adopting all possible Telecom applications without any exception whatsoever. We are headed into the future and let us not be driven into the dark ages of the past where in there existed a Telecom density of less than 3% in this vast country with innumerable opportunities that were thrashed by the stifling regulations and monopolies that existed then.</p>

Sl. No.	Point	Comments	Counter Comments
1	<p>In view of the discussion in Para 2.13, is it necessary to have a separate standalone licence for Voice Mail Service? If so, why? Please provide detailed justification?</p>	<p>The following comment by COAI covers for questions 1 to 4</p> <p>At the outset, we would like to submit that there is no need for the standalone Voice mail License and Audiotex License. Further, the Voice Mail /Audiotex /Unified Messaging Services need to come under the Unified License (Access Authorisation). Our submissions in regard are as below:</p> <p>a. As highlighted in the preamble there has been lot of incidents wherein current Audiotex licensees have violated their licensing terms and conditions by offering the calling services.</p> <p>b. These entities are generating two simultaneous and distinct calls, one for the Called number and another for the Calling number, after which these calls are then conferenced, thus evading payment of termination charges.</p> <p>c. These entities are converting an outgoing call into an incoming call and therefore, depriving the access operators of their legitimate call charges and causing huge revenue loss to access operators. The revenue loss to access operators is resulting in lesser payout to</p>	<p>This view deserves to be strongly opposed and condemned in view the facts that making two independent calls and conferencing the same through an automated platform to address the business needs and pains of the end businesses cannot be termed as any offense in the first place. There is a pressing business need and business pain to track the calls and connect the calls from the two stake holders whose needs can be met if only they get connected based on business logic than what the BSOs can offer in terms of mere phone connectivity between just two phones. The Hosted Telephony platforms are building and deploying intelligence through TAPI (Telephony Application Programming Interfaces with suitable software business applications) which is in line with the technology trends that address known business pains and evolve suitable solutions to the markets that absorb them.</p> <p>We strongly recommend a simplified registration or suitable declaration as the</p>

		<p>exchequer in the form of reduced license fee on revenues.</p> <p>d. The Voice mail and Audiotex services are offered under Voice Mail/Audiotex/UMS license or under Basic/Cellular/UASL/UL (access). In this regard, we would like to submit that while Basic/Cellular/UASL/UL (access) is subject to License fee, entry fee and other stringent license conditions, however there are no such conditions on the Voice Mail/Audiotex/UMS licensee. Thus, non-level playing field exists between the two types of licenses. Further, there is revenue loss to the exchequer as the Audiotex licensee is not paying any license fee for these services.</p> <p>e. Some of these services are also run from different offshore locations which not only cause loss to the exchequer but also creates security hazard for the country.</p> <p>f. With respect to the technical specification, it is submitted that the scope of service of current Audiotex license does not cover any audio conferencing service but the same has been included via a TEC specification. It may be appreciated that a TEC specification does not amount to any licensing condition and cannot change the service scope of license.</p> <p>2. In light of above, we are of the view that there should not be any standalone Voice mail License and Audiotex License and the same should be brought under UL (Access Authorisation). Further, all the current licensing clauses prescribing service specific conditions/prohibitions related to Audiotex</p>	<p>means to carry out such a business in this space legitimately sourcing and using the Telecom resources as an underlying infra for the intelligent solutions to be built and deployed on the Telecom infra to add value to the end businesses.</p>
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		Services should be incorporated in the UL (Access Authorisation).	
2	If the answer to the Q1 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?		
3	In view of Para 2.17 and present technological developments, is it necessary to have a separate standalone licence for only Audiotex Service? If so, why? Please provide detailed justification?		
4	If the answer to the Q3 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?		
5	Whether there is a need for standalone licence for providing Audio Conferencing Service? If	This comment by COAI is for both Q 5 and Q 6	As can be clearly observed form the points mentioned as above, The hosted Telephony providers do need to source their Telecom

	<p>yes, whether the technical specifications need to be explicitly defined? Please provide detailed justification?</p>	<p>1. We are of the view that there is no need for a separate standalone audio conferencing service License. Our submissions are as below:</p> <p>a. We are of the view that creating separate standalone license only creates opportunities to resell telecom services and create arbitrage of the nature pointed out above.</p> <p>b. In event of a standalone audio conference license, it will not be possible to differentiate between the conferencing service and normal switching architecture being provided by licensee. Thus, it will not be possible to identify and avoid revenue bypass situation under this license.</p> <p>c. The standalone license for Audio Conferencing Service, similar to the current Audiotex license will encourage transfer of revenue to non-revenue sharing entities. As highlighted above the Audiotex license holders do not pay any revenue share to the exchequer whereas telecom service providers pay at the rate of 8% under UAS License/Unified License.</p> <p>d. Some of the Audiotex licensees have been found to be servicing customers and services across the country and globe and offering services which are globally covered under Telecom licenses, though they are supposed to operate only in the SDCA.</p>	<p>resources for their applications and solutions. These will be the underlying infra. This should not be seen as reselling of the resources rather, should be seen as solutions being sold, which are built on this infra. Anyways the VNO initiative allows for the reselling the BSO resources. A similar facility may be allowed for these players as well under the recommended new registration process.</p> <p>It is absolutely improper to assume that it would not be possible to identify and avoid revenue bypass situations There is no way the Telco who lends their Fixed Line services be in dark about either revenue or its bye-pass as the Telco existing switches can always identify each and every call put through them.</p> <p>There is a comprehensive need to allow this innovation and ensure that these hosted Telephony businesses are facilitated to carry out their business without any regulatory ambiguity. These businesses are only application services companies and are not into the basic services which are actually covered globally under Telecom licenses. No limitation should be artificially clamped on them to limit the potential of their technologies to be confined to an SDCA or</p>
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			LSA. As long as all call legs are properly paid out, there should not be any limitation whatsoever for allowing the said services
6	If the answer to the Q5 is in the affirmative, what should be the technical specifications for providing Audio Conferencing Service?		
7	Is it necessary to have a separate licence for Unified Messaging Service when holding an ISP licence is mandatory to provide the Unified Messaging Service and standalone ISP licensee is also allowed to provide Unified Messaging Service? If so, why? Please provide detailed justification?	<p>As suggested in the preamble, the Voice Mail /Audiotex /Unified Messaging Services will need to come under the Unified License through Authorisation, we do not believe that there is need for the standalone Unified Messaging Service.</p> <p>2. Further, as highlighted in the paper there are only two entities providing the UMS as on date out of the sixty License holders. Hence, no need to have standalone license for the same.</p> <p>3. The UMS services can be provided by any licensee holding Access service license including Unified License (Access or ISP authorizations) and ISPs.</p>	<p>Bringing these services under UL does not serve any extra purpose than stifling all the innovation these start-ups can really add up to the best interests of the millions of small and medium businesses who are subscribing to these services. If only Unified license holders were serving all these needs these new generation hosted telephony start-ups might not have even surfaced in the first place. The very fact that they emerged, struck roots and are serving the thousands of clients out in the market is a vindication that Unified Licensing is not a facilitator for these innovations.</p> <p>It must be clearly differentiated that access license holder may provide all access services and all application service providers may be</p>

			<p>enabled to provide all application services without ant regulatory restriction.</p> <p>It may kindly be noted that the observations cannot be limited to only those who are holding the existing Audiotex license. There are many players who opt not to take these licenses, which are very restrictive and also does not cover the unified messaging solution their technology can offer. So we recommend a comprehensive review that enables these players to be registered and provide their services without any restrictions and at the same time bring them all under the regulatory purview that is simple, and enabling all regulatory supervision as required in the best interest of all stake holders.</p>
8	If the answer to the Q7 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?		
9	In case Voice Mail / Audiotex / Unified Messaging Service require a licence should they be made a part of the Unified Licence as one of the services		

	requiring authorisation? Please provide detailed justification?		
10	If the answer to the Q9 is in the affirmative, what should be Service Area? Whether Service Area may be similar to the Service Area of ISP (National Area, Telecom Circle/Metro Area, Secondary Switching Area) to bring in uniformity among the Service Areas of different services? Please provide detailed justification?		
11	If Voice Mail/Audiotex/Unified Messaging Services is made a part of the Unified Licence as one of the services requiring authorisation, then what should be the Entry Fee?	<p>This comment is for both Q 11 and Q 12</p> <p>1. The Entry Fee, Minimum Net worth and Minimum Equity should be the same as that applicable under UL (Access Service Authorisation).</p>	We strongly oppose this comment as this will create a huge entry barrier and all application services start-up companies which, with limited means cannot even venture to undertake the business and this is a highly regressive recommendation to curb all innovation in Telephony applications domain and to kill all these thriving start-up initiatives.
12	Whether there should be any requirement for Minimum Net worth and Minimum Equity for Voice Mail/Audiotex/Unified		

	Messaging Services authorisation under Unified Licence?		
13	The annual licence fee for all the services under UL as well as for existing UASL/CMTS/Basic Service/NLD/ILD/ISP licensees have been uniformly fixed at 8% of AGR since 1st April 2013. Whether it should be made same for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence? If not, why?	1. <i>Yes, the annual Licence fee should be same i.e. 8 % of AGR similar to the UL and other existing UASL/CMTS/Basic Service/NLD/ILD/ISP licensees.</i>	The AGR is only applicable for carriage services and access services and it should not be applied to the content services and application services that are deployed on the legitimately subscribed licensed Telecom resources. It amounts double taxation as both the infra is also taxed and application is also taxed and thus the very service becomes non viable financially with these additional AGR if levied on application services.
14	In case the answer to the Q13 is in the affirmative then what should be the definition of AGR for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?	The definition of AGR should be same for all licensees – i.e. include revenues only from licensed activities/services. We request that TRAI reiterate its Recommendations dated 6th January 2015 on “Definition of Revenue Base (AGR) for the Reckoning of Licence Fee and Spectrum Usage Charges”. 2. All revenues earned from subscribers through these services should be counted towards the revenue for the purpose of levy of license fee of 8%.	As mentioned above this leads to dual levy on the same resources and hence should be avoided completely on all telephony application services.

15	What should be Performance Bank Guarantee, Financial Bank Guarantee and Application Processing Fee for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?	The Performance Bank Guarantee, Financial Bank Guarantee and Application Processing Fee for Voice Mail/Audiotex/Unified Messaging Services should be as under Unified Licence (Access Authorisation).	As emphasized earlier, the application services should be kept outside the UL regime and anything that applies to UL should NOT be extended to Application Services.
16	Whether the duration of the licence with Voice Mail/Audiotex/Unified Messaging Services authorisation be made 20 years as in the other licence authorisations under Unified Licence? If not, why?		
17	What should be the terms and conditions for the migration of the existing Voice	This comment of COAI is for Q 17,18 and 19	As mentioned earlier, UL is meant for all access services and all emerging Telephony application services must get covered under a

	<p>Mail/Audiotex/Unified Messaging Services licensees to Unified Licence?</p>	<p>As, highlighted in the preamble we are of the view that there should be mandatory migration to the Voice Mail/Audiotex/Unified Messaging Services to UL (Access Authorisation).</p> <p>2. If a standalone Voice Mail / Audiotex / Unified Messaging Service provider is not mandatorily migrated to a Unified Licence, then it will only escalate the non-level playing field between old and new licence holders due to differential terms on which they operate, for instance, non-levy of LF on standalone Voice Mail / Audiotex / Unified Messaging Service providers.</p>	<p>new and simplified registration process as value added communication service providers and this recommendation of COAI may kindly be rejected. There is no basis to raise a level playing field argument in this context in the first place. No application service provider can ever replace or substitute the strong base of the carriage service providers. Application service providers play only an augmenting and complementing role for the growth of the Telecom sector, which benefits all Telecom access service providers, as their business, grows exponentially with the growth of the application services providers.</p>
18	<p>Whether the existing Voice Mail/Audiotex/Unified Messaging Services licensees may be allowed to continue or it would be mandatory to migrate to the Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?</p>		
19	<p>What should be the annual licence fee for existing Voice Mail/Audiotex/Unified Messaging Services licensees who do not</p>		

	migrate to the Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?		
20	Please give your comments on any related matter, not covered above		