

From: "Sharma Praveen (VP)" <praveensharma@tatacommunications.com>
To: advmn@traigov.in

Subject: TCL response dt 28-Jan-20 to TRAI Pre-CP on unbundling of license regime

Dear Sir,

Kindly find attached herewith TCL response to TRAI pre-consultation on "Enabling Unbundling of Different Layers Through Differential Licensing" for your kind consideration. Apologies for delay in responding to the Pre-CP.

Kind regards

Praveen Sharma

For Tata Communications Ltd

TCL response to TRAI pre-consultation on “Enabling Unbundling of Different Layers Through Differential Licensing”

Q1. In your view, what could be the possible benefits and anticipated problems in having an unbundled licensing regime? Kindly suggest the measures that can be taken to overcome the anticipated problems (if any).

TCL Response:

Current License regime broadly classified in two categories UL and UN (VNO) delinks license for Network from the Delivery of Services where NSOs (under UL) can build, operate and Deliver Services and UL(VNO) can take the infrastructure and network from NSOs (UL) and deliver the Services. In addition to the UL and UL(VNO), a company registered as, Infrastructure Provider-I (IP-I) with DoT is permitted to lay telecommunication infrastructure. Besides that UL and UL(VNOs) holders can provide managed Services, Value added Services and Applications on top of telecom services and beyond. Further as per TRAI CP, The application layer consists of those application providers who are providing various application services to different verticals using telecom resources with the upcoming technologies such as Machine to Machine (M2M) communications, IoT, Cloud services, data centres, e-commerce etc. different application providers are in the field and they are using the telecom resources.

As such, there is not much benefit to “unbundle” the existing licenses into further narrow fragmented categories of Infrastructure, Network, Service and Application layer as it may increase the complexities and compliance requirements.

Q2. In case it is decided to unbundle the different layers of licensing,

(a) what should be the different layers and their scope? What changes would be required in licensing regime to enable such a framework?

(b) Should there be a new regime of licensing on which the existing licensees should migrate within a specified time frame or there should be a parallel incentivized licensing regime for unbundled layers of license?

TCL Response:

- a)** We do not recommend further unbundling of the license regime.
- b)** Not applicable in view of response to Question No.1 and 2 (a) above. In case a new regime of licensing is brought about the migration should be either on expiry of existing licenses or through incentivization for speeding up the migration to new regime. Further, a level playing field shall be maintained for all stakeholders.

Q3. In case you are of the opinion that there is no need of unbundling of different layers of the license, what changes should be made in the existing licensing regime to (i) promote sharing to increase utilization of the existing resources, and (ii) catalyze investments and innovation in Digital Communications sector?

TCL Response:

Active infrastructure sharing should be freely permitted across the licenses between different Service Providers. Active infrastructure sharing should also be permitted for the IP-I players so that they can share the active infrastructure with various TSPs.

Q4. What other reforms / changes are required in the existing licensing regime?

TCL Response:

The changes in the existing license regime should aim towards simplification of license regime in terms of levies required to be paid by the Operators, compliance processes and costs in the licenses, right of ways process and cost structure simplifications, identifying Telecom Infrastructure as a critical infrastructure to enable better uptime on fibers, thus ensuring better Network quality as a whole etc.