

VIEWS AND COMMENTS ON CONSULTATION PAPER ON REVIEW OF THE REGULATORY FRAMEWORK FOR INTERCONNECTION BY UPOBHOKTA SANRAKSHAN AND KALYAN SAMITI,KANPUR NAGAR,CONSUMER ADVOCACY GROUP MEMBER TRAI.

Q.1 Whether the flexibility be provided to interconnecting operators for interconnecting PSTN to PSTN networks at SDCC/ Level II TAX (SSA)/ Level I TAX (LSA) levels as per their mutual agreements? If no, then justify your comments with reasons.

One option for simplifying the interconnection framework for fixed line networks could be to provide the flexibility to interconnecting operators of establishing POIs at SDCC/ Level II TAX (SSA)/ Level I TAX (LSA) levels as per their mutual agreements. In case of disagreement, a fallback option is specified in the regulations. This could be Level II TAX or Level I TAX. It may help in reducing the entry barriers for new fixed line operators. It may also do the balancing between cost of establishing and maintaining a POI near to the terminating location versus payment of carriage fee to the fixed line operator. Extending these flexibilities, the compliance of the national fundamental plans and integrity of the networks can still be ensured.

Q.2 In case of no mutual agreement between the operators, what should be the level of interconnection for interconnecting PSTN to PSTN networks be mandated in the Regulations.

This highly decentralized type of interconnection may not be in the interest of service providers also as it may be increasing the cost of operations. The overall approach of the regulations must be one that gives greater operational flexibility to operators

Q3. Any other issue you would like to bring to the attention of the Authority

The contemporary packet switched networks the core networks architecture has evolved from hub and spoke model to ring based, simplification of interconnection regime for fixed line networks may help in growth of fixed line broadband connections and protecting the interests of the service providers and consumers