Issues for Consultations

Annexure

Annex

*VOICE comments on **Issues for Consultation***

1. **Who we are and Why We are Commenting ?:**

Consumer Voice welcomes the opportunity to respond to this consultation paper. This is the 25th year of our existence as well as our work to educate consumers and protect consumers interest. We were among the first Consumer Advocacy Groups to be registered by TRAI and have been recognized by the Union Department of Corporate Affairs under MRTP Act, 1969 and are currently operating a Programme for Comparative Testing of Consumer Products and Services under an MoU with the Union Ministry of Consumer Affairs

4.1 Whether Internet service provider should be permitted Internet Telephony services to PSTN/PLMN within India? If yes, what are the regulatory impediments? How such regulatory impediments can be addressed? Please give your suggestions with justifications. *(para 3.10)*

YES. Regulatory impediments are:-
A] Entry Fee. While providing level playing field ,AUSP need be Compensated for higher entry than making ISPs pay the high entry.
B] Other issues like IUC, Numbering and monitoring need be deliberated with service providers.

4.2 Whether allowing ISPs to provide Internet Telephony to PSTN/ PLMN within country will raise issues of non-level playing field? If so, how can they be addressed within present regulatory regime? Please give your suggestions with justifications. *(para 3.11)*

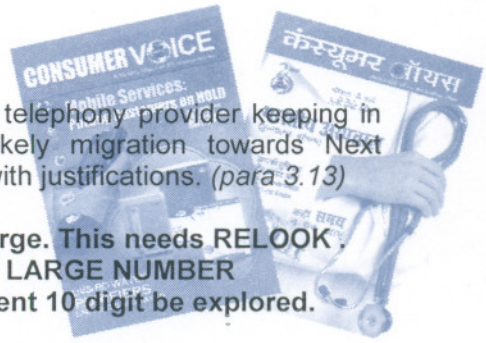
YES.
Present regulatory frame work is not adequate to address the issues. Need for changes.

4.3 ISPs would require interconnection with PSTN/PLMN network for Internet telephony calls to PSTN/PLMN. Kindly suggest Model/ architecture/ Point of Interconnection between ISPs and PSTN/PLMN? *(para 3.12)*

INTERCONNECT exchange is the most suitable solution.

4.4 Please give your comments on any changes that would be required in the existing IUC regime to enable growth of Internet telephony? Give your suggestions with justification to provide affordable services to common masses? *(para 3.12)*

As the carriage charges need be redistributed between ISP and BSO. This should be left to negotiation between the two.



4.5 What should be the numbering scheme for the Internet telephony provider keeping in view the limited E.164 number availability and likely migration towards Next Generation Networks? Please give your suggestions with justifications. *(para 3.13)*

A] Number of blocks provided for fixed line is too large. This needs RELOOK .
B] To meet the peculiar need of numbers for VERY LARGE NUMBER of subscribers , move to 11 digit number from present 10 digit be explored.

4.6 UASL and CMTS operators are allocated number resources and permitted to provide Internet telephony including use of IP devices/Adopters. Whether such devices should be allocated E.164 number resource to receive incoming calls also? If so, whether such number resources should be discretely identifiable across all operators and different than what is allocated to UASL and CMTS to provide fixed and mobile services? Give your suggestions with justifications? *(Para 3.4)*

While opening Internet Telephony to ISPs as well, use of IP devices / Adopters is not necessary. And these devices need not be provided E164 numbers.

4.7 If ISPs are allowed to receive Internet telephony calls on IP devices/ Adopters, what numbering resources should they be allocated? *(para 3.13)*

Blocks from E 164 may be considered for allotment.

4.8 Is it desirable to mandate Emergency number dialing facilities to access emergency numbers using internet telephony if ISPs are permitted to provide Internet telephony to PSTN/PLMN within country? If so, Should option of implementing such emergency Number dialing scheme be left to ISPs providing Internet telephony? Please give your suggestions with justifications. *(para 3.14)*

Option of implementing number portability , emergency number be left to ISPs.

4.9 Is there any concern and limitation to facilitate lawful interception and monitoring while providing Internet telephony within country? What will you suggest for effective monitoring of IP packets while encouraging Internet telephony? Please give your suggestions with justifications. *(para 3.15)*

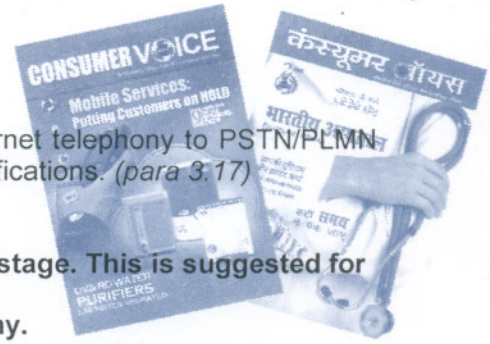
INDIA being TERROR STRIKE victim, lawful interception and monitoring is very essential. This may be done by installing at International Internet Gateway / terminating exchange.

For traffic within the country ,encryption may be necessary.

4.10 Is there a need to regulate and mandate interoperability between IP networks and traditional TDM networks while permitting Internet telephony to PSTN/PLMN within country through ISPs? How standardization gap can be reduced to ensure seamless implementation of future services and applications? Please give your suggestions with justifications. *(para 3.16)*

Standardization means additional cost and the time delay in implementation.This can be deliberated by the service providers and the regulator.

Interoperability is desirable but must not become impediment in launch of service.



4.11 Is there a need to mandate QoS to ISPs providing Internet telephony to PSTN/PLMN within country? Please give your suggestions with justifications. *(para 3.17)*

To start with NO. This may be considered at later stage. This is suggested for Smooth and quick introduction of Internet Telephony.

Prepared by Working Group set up by VOICE in April 08 for submission to TRAI in response to its Consultation paper. It has been provided for use of TRAI and may not be used by anyone else without permission of the authors. © April 2008 : Comments are welcome to VOICE, 441, Jungpura, Mathura Road, New Delhi 110024 Email: cvoice@vsnl.net Web: www.consumer-voice.org