



No.:1-38/2010-Regln

Dated 23rd November' 2010

To,

The Secretary,
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg (Old Minto Road),
Near Zakir Hussain College,
New Delhi-110002

{Kind attention: Shri S. K. Gupta, Advisor (CN, IT &CA)}

Subject: Consultation paper on "Quality of Service requirements for Delivery of basic financial services using mobile phones".

Kindly refer to your consultation paper No. 13/2010 issued on 28th October, 2010 regarding issues relating to Quality of Service requirement for Delivery of basic financial services using mobile phones.

In this regard, the comments of BSNL are enclosed as Annexure-I for your kind consideration please. These comments have been also sent through e-mail at advqos@traf.gov.in.

Encl.: Annexure-I

(Ashok Kumar Rawat)
DGM (Regulation - II)-CA



COMMENTS OF BSNL ON CONSULTATION PAPER ON “QUALITY OF SERVICE REQUIREMENTS FOR DELIVERY OF BASIC FINANCIAL SERVICES USING MOBILE PHONES.

Sr. No.	ISSUES FOR CONSULTATION	BSNL's Comments
2.1	<p>What method(s) of communication on mobile network (GSM and CDMA) would be suitable for enabling financial transactions using mobile phones? Please explain your answer.</p>	<p>The methods of communication used for performing financial transactions will have a great bearing on the capability of the handset. Following are the two suggested methodologies depending upon type of mobile handset:</p> <ul style="list-style-type: none"> • For Low end mobile: IVR & SMS based methods In this case the IVR infrastructure shall be deployed by the bank/financial institution & chargeable code will be opened by the Telcos. In case of SMS the Telcos shall be responsible for opening the codes on chargeable basis. • High end mobiles: GPRS along with J2ME(Java 2 Platform, Micro Edition) enabled handset Sometimes the low end phones may not support the GPRS and/or J2ME software. Therefore depending upon the capability of the handsets the above methods have been suggested. <p>It is strongly felt that with the prices of handsets going down, even the starting range of handsets have the GPRS and J2ME capabilities. It is further felt that any fool proof method will have to comprise of the encryption and security provided using any of the data bearers.</p>
2.2	<p>What in your view would be appropriate time frames for delivery of messages and responses with respect to the method(s) suggested by you? What parameters Need to be defined to ensure timely delivery of information to support financial transactions using mobile?</p>	<p>IVR as well as J2ME both are expected to be real time two way sessions; however SMS has inherent issues of delays and unilateral way of transmission or sometimes non-delivery or delivery which is not in order of sending. This is due to the methods/ ways by which the SMSs are sent.</p>
2.3	<p>In the method suggested by you would it be possible on the network? If yes what would be the cost implications? Please also reply this with reference to SMS as means for financial transactions.</p>	<p>As IVR as well as J2ME both facilitate real time transactions therefore there is no need to prioritize the transaction messages sent through this method. However it may be noted that it is not possible to prioritize the</p>



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		transaction messages which are sent using the SMS technology as there is no technical parameter defined to give priority to a particular SMS in the present standard deployed system design.
2.4	What do you think would be the security requirement using the method proposed by you for the five basic transactions i.e. no frills account opening, cash in, cash out, checking balance, and money transfer?	<p>Security requirement for using various methods are as proposed below:</p> <ul style="list-style-type: none"> • IVR based: it can be made PIN based where the user is prompted to press/ speak his PIN before any transaction is completed for a particular account. • SMS based: <ul style="list-style-type: none"> i.Normal SMS: SMS is understood to be most unsecure methods of sending messages. ii.SMS through J2ME application: If SMS based J2ME application is used the SMSs may be encrypted. This application converts the information filled in by the user into an SMS and then encrypts the message before finally sending it as SMS. • GPRS (Standard J2ME applications)- It has inherent encryption capability. It encrypts the information travelling over the air on radio channels. Encryption level may be defined by TRAI.
2.5	What would be measurable QoS parameters for such networks? Please specify both network and customer centric parameters.	<p>Following may be the measurable parameters:</p> <p>From customer point of view: Time to access the service.</p> <p>Network point of view: KPI like RTT, PDTCH/TCH congestions, SDCCH congestions etc.</p>
2.6	Please list any other issue that you think is important and your comment thereon to finalise QoS parameters for facilitating financial transactions on mobile network?	Security of the transmission involving financial transactions is of paramount importance.