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Subject: ACTO's response to TRAI Paper dated 14th March 2017 seeking inputs on
"Ease of doing Telecom Business in India"

Dear Sir,

Association of Competitive Telecom Operators (ACTO) is pleased to submit its response to TRAI Paper on "Ease of doing Telecom Business in India".

Association of Competitive Telecom Operators (ACTO) would like to welcome TRAI's paper seeking inputs on a subject on which Government of India has been laying major emphasis across all sectors including Telecom.

The paper is timely as the telecom industry is witnessing a splurge in data networks and services. The policies and regulations that have helped in the growth of voice centric services in last over two decades may not truly be relevant for data. Therefore the need is to arrive at a next generation regulatory and policy framework – which is futuristic, technology neutral, service agnostic and supports the evolving converged and technology service networks in line with international best practices across voice, data and video.

We are confident that our inputs to this important paper (enclosed as Memorandum) will merit the consideration of Hon'ble Authority.

Thanking you,

Respectfully submitted

Yours sincerely,
for **Association of Competitive Telecom Operators**

Tapan K. Patra
Director

Encl.: As above

**ASSOCIATION OF COMPETITIVE TELECOM
OPERATORS**

MEMORANDUM

ON

**EASE OF DOING TELECOM BUSINESS IN
INDIA**

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ACTO's response on TRAI Paper on Ease of doing Telecom Business in India

ACTO sincerely thanks the Hon'ble Authority for bringing out this paper which is in line with the government's initiative to create a business friendly environment in India across all sectors. It is a very important step towards making Indian telecom sector more viable to facilitate innovation, and encourage investment from policy and regulations perspective.

1. Reduction in the Current 5% Universal Service Obligation (USO) Fund Levy:

The USO levy which is a major portion (5%) of current license fee (8%) needs to be significantly reduced. The license fee has been significantly reviewed from 15% to 8% and is still on a higher side (given TRAI's recommendations on Unified License dated October 2003, wherein a 1% license fee as administrative levy has been recommended). However, the USO levy has remained consistent at 5%.

We note that TRAI in its October 2003 recommendation has noted that the license fee should be in the form of an administrative cost which is to take care of managing, licensing and regulating the sector.

On the USO levy TRAI stated that with technological developments, flexibility in the licensing regime, deployment of more and more wireless technologies and the growth of telecom services even in backward areas from telecom point of view, the Government may consider reviewing the level of USO levy and Administrative fee.

This will certainly help the sector improve its financial viability by reduction of cost leading to affordability at the hands of the consumers. Also, the reduction in the absolute amount in the collection of the USO levy as a result of such reduction in the percentage, if accepted, will be more or less be offset by the increase in its collection as a result of increase in business of the TSPs .

TRAI in its various recommendations dated 06th January 2015, 27th October 2013, has also recommended a reduction in the USO levy from 5% to 3% as well as reduction in license fee.

However, the recommendations have somehow not been approved by DoT's Telecom Commission. We request that this matter be approved in the larger interest of the sector's viability and ensuring affordability at the hands of consumer.

As per the details available at DoT/USO website <http://www.usof.gov.in/usof-cms/usof-fund-status-table.jsp> the amount collected in the USO fund is Rs. 84186.46 Cr as on 31st March 2017 The amount lying unutilized is Rs. 46875.96 Cr. Given the quantum of unutilized funds it may not be appropriate to continue charging 5% as USO levy. The unutilized funds show that corpus has not been efficiently utilized. More so the purpose for which it has been collected has started to achieve results. The rural teledensity in 2003 when the fund was set up was 7.02% which is now 89.90% (on December 2016). This has been largely due to collective efforts of industry. Therefore the USO fund should be reduced as the sector continues to operate under a cumulative levy of over 35%.

2. Definition of Revenue (Gross Revenue (GR) and Adjusted Gross Revenue (AGR) for the purpose of payment of License Fee:

The current definition of revenue under the license, subjects all types of revenue (whether derived from providing telecom services or non-telecom services) to license fee payment. TRAI in the past on numerous occasions recommended that revenue derived from only telecom services should be subject to license fee payments. This was the essence of the migration package dated 22nd July 1999 wherein license fee was subject to revenues derived under the license.

However, TRAI recommendations have so far not been approved and this matter continues to be before the Hon'ble Courts for a decision. This is not in the interest of the sector. We understand that opportunities to correct this aberration has been missed and needs to be corrected. These were during the formulation of Unified License (UL) and Virtual Network Operator (VNO) License wherein there has been no change done to the definition of revenue.

The definition of revenue needs to be corrected to include only sources from telecom services. Revenue derived from non-telecom sources should not be subjected to license fee payments.

3. Unified License (UL):

Although unified license is in place for last 3-4 years but the spirit of unification is somehow missing. Current UL is just add on in nature rather than true unification and continues with several regulator /policy restriction in particular to interconnection. Technology enables convergence of services and it will enable a much Advanced and Open IP platform which will enhance the end-user experience and will efficiently address the growing business needs by leveraging on the best of both worlds. Thus, the Unified License should be service agnostic and technology neutral, allowing the provision of any telecom service on non-exclusive basis, anytime, anywhere, using any technology within the license area. It should recognize and provide flexibility to embrace future evolving technologies like Cloud Computing, Machine to Machine (M2M). The current UL framework continues with the same restriction which existed in the earlier regime when specific licenses were provided. Therefore the need is to ensure a unification model which cuts across the license specific boundaries and provides true value to the service provider to offer services to the customers.

4. Sharing of infrastructure including switch across all licenses:

In last couple of years, based on TRAI recommendation, DoT has allowed sharing of passive and some of active (limited) infrastructure. Presently there are still some restrictions on the sharing of both active and passive infrastructure between various telecom operators and infrastructure providers. This has resulted in unnecessary duplication of infrastructure, which could lead to further issues to industry moving forward as operators consider moving into NGNs and new technologies, and where there are extremely heavy costs involved. Current need is to allow full fledge sharing of infrastructure instead of bits and pieces.

All infrastructure/ equipment sharing should be permitted across all licenses (including Internet Service Providers) without any restrictions, to ensure effective and efficient usage of costly telecom equipment /infrastructure built. This will ultimately lead to higher utilization, leading to reduction in OPEX for service providers and better business case for infrastructure creators. Being Telecom a capital sensitive and having very low Return on Investment (RoI), Policy makers/regulators must allow sharing the telecom infrastructure for optimum usage subjected to mutual agreement between TSPs. Moreover technological development enables to share the active infrastructure among TSPs more efficiently.

Globally there are no restrictions on sharing of infrastructure amongst by the license amongst own license. The operator should be left to best utilize this own resources. Similarly time has now also come that the operators be allowed to share his infrastructure with other licensed operator. If the Government has any risk perception in the same, they may lay down the check and balances while allowing the sharing of infrastructure.

5. Facilitate seamless interconnection between IP and PSTN:

In the today's world of convergence all the regulatory imbalances in the area of interconnectivity should be removed. The telecom service provider or the consumer/user should have the option to choose the type of connectivity itself. The license conditions should not be flexible enough to enable the user or TSPs to offer any type connectivity accordingly.

This regulatory imbalance if removed will go in long way in promoting ease of doing telecom business in India.

In order to realize the true potential of convergence of services, network and devices and to achieve the stated objectives of the convergence goals of Network / Services / devices, the restrictions/ barriers between different PSTN / IP networks should be removed under the Unified License to ensure seamless interconnection.

We would like to respectfully submit that this continued restriction would impact the transition towards achieving the stated objectives of full convergence goals of networks / services / devices as enshrined in the National Telecom Policy 2012 as below:

“3.1. To orient, review and harmonise the legal, regulatory and licensing framework in a time bound manner to enable seamless delivery of converged services in a technology and service neutral environment. Convergence would cover:

3.1.1. Convergence of services i.e. convergence of voice, data, video, Internet telephony (VoIP), value added services and broadcasting services.

3.1.2 Convergence of networks i.e. convergence of access network, carriage network (NLD/ILD) and broadcast network.

3.1.3. Convergence of devices i.e. telephone, Personal Computer, Television, Radio, set top boxes and other connected devices.”

“3.3. To move towards Unified Licence regime in order to exploit the attendant benefits of convergence, This new licensing regime will address the requirements of level playing field, rollout obligations, policy on merger & acquisition, non-discriminatory interconnection including interconnection at IP level etc. while ensuring adequate competition.”(Emphasis Supplied).

“3.15. To enable and enforce the VOIP facility to enhance consumer affordability.”

In our view, IP-PSTN interconnection is equally vital and important for continued growth trajectory for the BPOs/Enterprise Data Services sector. Enterprise/BPOs require this

flexibility for their in-house captive requirements. In the absence of such flexibility, there would be unnecessary investment on duplicating the infrastructure separately on voice and data networks. IP/VPN-PSTN interconnection would lead to interconnection of IP and TDM networks. This would necessitate an interconnection regulation, which would be framed by TRAI also mentioned in clause 3.3 of NTP-2012.

Convergence will enable a much advanced and open IP platform which will enhance the end-user experience and will efficiently address the growing business needs by leveraging on the best of both worlds (IP & PSTN).

Benefits of allowing IP-PSTN interconnectivity

To the BPO sector:

Today most of the BPOs are looking for operational efficiencies and cost optimizations. Most of the International call centers (CC) today have either a separate system for their domestic requirements or go through the logical partitioning way.

Both the options are expensive. Separate systems for domestic and international call centers means the following additional costs:

- a) Investment in two independent call center infrastructures: Even if each infrastructure can meet the capacity requirements of both international and domestic CC, investment is required to setup two independent setups.
- b) Maintenance cost associated with the additional system.
- c) Excess capacity on one system cannot be leveraged by the other.
- d) Expensive and time consuming integrations (CTI, CRM etc.) needed for both the systems.
- e) Industry is unable to leverage global CC infrastructure for India sites those need of Domestic & Intl CC processes due to need for separation of India PSTN & Domestic process. This adversely impacts Indian BPO industry competitiveness.
- f) Some of the call centers those are using Internet Telephony for International CC environment due to cheaper option are adversely impacting the image of Indian CC/BPO industry due to poor quality of voice delivery.

By allowing IP–PSTN connectivity, the Call centers would save a lot of expenses that they incur today making them cost efficient and competitive to other comparable economies like Philippines which has taken over India in outsourcing business.

The non-availability of the IP-PSTN interconnection poses the following challenges:

1. The complete benefits of the unified communication solutions cannot be reaped until and unless the IP–PSTN interconnect is allowed.

Some of these features include:

- a) Conferencing: Participants from IP and PSTN cannot be in the same bridge (audio/Video).
- b) Mobility : The following features of Mobility cannot be used :
 - Soft-Phone: Soft-phone users cannot call India PSTN from their Laptops.
 - Call-Forward: A IP call cannot be forwarded to a local PSTN number.
 - Parallel Ringing: Unified Communication (UC) solution allows parallel ringing of desk-phones and Hand-phones. This feature cannot be used today.
- c) Voice-Mail: Customers have to maintain separate Voice Mail systems for their IP and PSTN Phones.
- d) Voice Gateways aggregation: Every customer site with IP Telephony needs separate voice gateways & PSTN lines at each site, expensive & increases maintenance cost. No voice gateways aggregation possible unless IP–PSTN interconnection is allowed.

Benefits to the Enterprise sector

Enterprises today are looking at higher levels of employee collaboration. For this reason they are investing in Unified communication solutions. These solutions are designed to improve the employee productivity. These solutions have the potential to reduce employee work-load as it provides the flexibility for the employee to work from anywhere.

6. Double levy of License Fee:

The current AGR definition does not allow deduction of such bandwidth related cost at each level leading to the issue of multi stage assessment of license fee which is currently in vogue and severely impedes competition in the enterprise services and data sector. This leads to a cascading impact in the entire chain thereby significantly raising the cost on end consumer. The input cost (i.e. bandwidth cost for data) should be allowed as deduction while calculating AGR.

Even in the recent VNO license this anomaly exists which impedes the ability of a VNO to compete effectively in the telecom sector. In the VNO one has to pay the license fee while purchasing the bandwidth from the TSP and again while selling it to user the License fee needs to be paid.

Current licensing condition mandates TSPs to pay License Fee twice or multiple times while buying bandwidth from another TSPs and selling it to its customers. This policy not only hurts the sentiment of investor but also impacts the business margin.

Presently, the deductions for pass through charges (interconnection) are applicable to voice services only but not for data services (in terms of bandwidth as an input cost) whereas both services are provided under the same license. In fact there should be a proper review of the definition of AGR and GR to identify what should and should not form part of the definition from license fee payment perspective.

There needs to be shift from pay license fee on revenues earned under the license as against revenues earned by the company holding the licensee. Imposing fee on revenues from activities which are not accrued on the strength of the license increases the cost of providing services. This leads to unaffordability issue at the hands of customer.

The definition of GR and AGR should correct the anomalies under the new UL regime, VNO and all future licenses. This is important from consumer affordability and long term viability of stakeholders in the industry.

- License fee should be levied only on licensed services/activities as per section 4 of ITA 1885.
- Multistage regulatory levies should be eliminated.

7. Simplification under the current process of taking Prior Approval for Remote Access (RA):

All the licensed telecom operators requiring remote access approval of their Indian locations through designated and identified foreign locations, have been duly submitting their respective applications as required vide letter dated December 7, 2007 under the extant RA policy as stated under Press Note 3 of 2007 dated April 19, 2007, which has been duly incorporated in all the telecom licenses.

The current dynamic scenario requires the processes to be responsive in order to thwart cyber threats, meet the Quality of Service norms and for general hygiene / upkeep of the network.

The current process of obtaining prior approval for remote access from foreign locations has proved to be extremely time consuming and leads to continued, unexplained and inordinate delays in obtaining approvals.

This delay is a barrier in efficiently managing the networks, especially in case of disaster or failure of particular RA locations, having serious implications for maintenance of networks, as also from quality of service perspective. Especially in the current era, cyber security threats have become a serious challenge and need to be tackled efficiently and proactively.

The licensees have made substantial investment in their networks and they should be allowed to legitimately operate it without any overbearing conditions which impair their ability to attend to issues in a proactive manner. The change in the process requested will provide the much needed operational flexibility to telecom licensees to operate their network and also in addressing / eliminating the risk from cyber-attacks and other security threats.

We request that the existing process be changed to “**prior intimation**” as against the current process of seeking “**pre-approval**”. This will help the telecom licensees to proactively and reactively mitigate and thwart such threats and prevent any such cyberattacks on their network on a timely basis.

It is suggested that the process of intimation, be introduced instead of the current process of obtaining prior approval of locations which is time consuming and builds in uncertainty into the process. The TSPs will continue to provide all the required information and in the manner as prescribed. Also the existing process be made more transparent and responsive from timelines perspective.

8. Reconsideration of interest on License Fees Payable and interest to be given on running credit:

Currently various licenses provide for charging interest from TSPs owing to delays in License Fee Payments made by them. The relevant clause in the 6.5 in NLD & ILD & ISP license clause 19.5, are reproduced below.

NLD & ILD License:

“6.5 Any delay in payment of LICENCE Fee, or any other dues payable under the LICENCE beyond the stipulated period will attract interest at a rate which will be 2% above the Prime Lending Rate (PLR) of State Bank of India existing as on the beginning of the financial year (1st April) in respect of the licence fees pertaining to the said financial year. The interest shall be compounded monthly and a part of the month shall be reckoned as a full month for the purpose of calculation of interest”.

ISP License:

“19.5 Any delay in payment of Licence Fee payable, or any other dues payable under the LICENCE beyond the stipulated period will attract interest at a rate which will be 2% above the Prime Lending Rate (PLR) of State Bank of India prevalent on the day the payment became due. The interest shall be compounded monthly and a part of the month shall be reckoned as a full month for the purposes of calculation of interest. A month shall be reckoned as an English calendar month.”

We would like to mention some points regarding the Prime Lending Rate (PLR).

- i) Initially, the interest for delayed license fee payments was charged at SBI PLR + 5%. In 2005, this rate was reviewed by DoT and was reduced from SBI PLR + 5% to SBI PLR + 2%.
- ii) Earlier, PLR rates were considered to be an effective and transparent mechanism for charging interest. However, since FY 2011, the Base Rate system replaced the Bank Prime Lending Rate (BPLR) system.
- iii) Thus, in today's context, the PLR rate may no longer be a transparent representation of the cost of capital available in the economy. The same is also recognized by DoT, in the current NIA of August 2016, wherein we believe that the current SBI Base Rate of 9.30% has been used as the IRR, in case payment has to be made as per the deferred payment option.

iv) Eventually, the PLR regime was replaced by the Base Rates & since 1st April 2016, the Marginal Cost of Fund Based Lending Rate (MCLR) is being used as a benchmark rate for all new borrowings.

v) Linking the rate of financing to the benchmark rates allows the rate to re-adjust to the prevailing interest rate benchmarks/cost of funds in the economy. This ensures that the interest of the Government is always safeguarded.

In view of the above mentioned points, we request that:

a) Replace the rate of interest currently charged at SBI PLR Rate + 2% to SBI Base Rate, which is a more transparent and representative benchmark rate as applicable in the current scenario to be used for the determination of applicable interest obligations.

b) Alternatively, benchmarking the Rate of Interest on license fees payable at par with the SBI 1 year MCLR, as is applicable on the 1st of April each year.

c) Since the interest rate and calculation methodology itself is equally punitive, we would request that there should be no further increment in the base interest rate so decided, which otherwise is currently at +2%.

d) Additionally, it is requested to amend the requirement related to monthly compounding as mentioned in Clause 19.5 of ISP license and Clause 6.5 of NLD & ILD License.

9. Guidelines for Virtual Network Operators (VNO):

The TRAI recommendations on VNO which were later approved by DoT are based on the premise that VNOs are an extension of MNO. However, the NTP 2012 makes no such distinction. Therefore we request that the current restriction placed on VNOs for access services that they cannot have agreements with more than one MNO needs to be removed.

In order to ensure broadband connectivity in unserved and underserved areas, it is important that the VNOs be allowed to interconnect with other MNOs with whom their principal MNO do not have an agreement. This will provide the much needed flexibility to VNOs to operate which will help fulfill Government's objective.

The bharat broadband network is slated to connect 2,50,000 panchayats. However, it is important that such a network be optimally used by all players including VNOs to achieve objectives. The current restriction on "no multi-parenting" will not allow efficient utilization of bharat broadband network if VNOs are not allowed to independently connect to provide services in rural and far flung areas.

This is also not in line with NTP-2012. The NTP-2012 also says:

3.3. To move towards Unified Licence regime in order to exploit the attendant benefits of convergence, spectrum liberalisation and facilitate delinking of the licensing of Networks from the delivery of Services to the end users in order to enable operators to optimally and efficiently utilise their networks and spectrum by sharing active and passive infrastructure. This will enhance the quality of service, optimize investments and help address the issue of the digital divide. This new licensing regime will address the requirements of level playing field, rollout obligations, policy on merger & acquisition, non-discriminatory interconnection including interconnection at IP level etc. while ensuring adequate competition.

3.6 New Unified licensing regime will provide flexibility to operators to operate any or all segment of services of the total basket of services provided in the scope of licence. The entry fee regime will also be made flexible accordingly.

3.8. To facilitate resale at the service level under the proposed licensing regime – both wholesale and retail, for example, by introduction of virtual operators – in tune with the need for robust competition at consumer end while ensuring due compliance with security and other license related obligations.

10. Simplification of OSP registration and it's compliance requirements:

The concept of registering with DOT was introduced to facilitate Call Center business, which in early 1990s required calling via IPLC/IP based calling, as making calls using conventional PSTN calling were considered very expensive. Thus in order to give this special exemption to call centers, the calling from IPLC was allowed for Companies having OSP registration. The initial requirement was also more from a statistical perspective. Thus, the requirement of OSP registration was introduced for the Services like call centers, network operation centers, tele-marketing, tele-education, tele-medicine, tele-trading, e-commerce using infrastructure provided by various access providers are being registered under Other Service Providers (OSP) category as provided in NTP'99.

Registration of OSP was originally required essentially for the purpose of

- (i) Statistical information
- (ii) Ensuring that their activities do not infringe upon the jurisdiction of other access providers.
- (iii) **Providing special dispensation to boost the BPO sector.**

The third point above is the most significant one, as the registration was meant to boost the BPO sector, however over time the dynamics of things have changed drastically and there is a real need to examine, if this OSP registration are really getting any special dispensation or instead are being made to offer services in a more restrictive manner.

We believe the OSP registration process should be simplified and unless certain notable special privileges can be extended to the OSPs viz non OSP enterprise customer.

1. International / Domestic OSPs are not belonging to same company / group company are not allowed to connect to each other network within India for voice / non-voice traffic (data) connectivity. Outsourcing by bigger entities to smaller entities (third party) is restricted. Sharing of telecom bandwidth with other legal entities should be allowed

2. Currently International OSP network is not allowed to interconnect with Domestic OSP which is resulting the high expenses and not proper utilization of network too. While an non OPS can do the same without any restriction. In order to promote the ease of doing business interconnection between any international OSPs and Domestic OSPs networks within India without any restriction should be allowed.

3. As per OSP Chapter IV (A-4) “No voice traffic shall flow between the Domestic and international OSP centres and/or cause bypass of the network of the Authorised Telecom Service Providers.

In order to follow the rules companies need to have agents supporting both domestic & international call centre raised to increase expenses for following this rule.

4. Interconnectivity of the International OSP with Domestic OSP / PSTN is not permitted. In our view sharing of infrastructure and single EPABX between International OSP and Domestic OSP, and also allowed PSTN connectivity to the International OSP at the Indian end as well should be allowed.

5. No PSTN connectivity is permitted to the International OSP at the Indian end. However PSTN connectivity on foreign end is permitted having facility of both inbound and outbound calls. This should be removed.

6. The OSP should get network diagram approved by Telecom Service Provider(s) from whom the resource are taken. As long as the telecom resources are taken form Authorised TSPs, there should not be any requirement for submitting Network Diagram. If the same can not be done away with, then certain basic parameters be laid down, to ease the submission.

There is a serious need to relook at the requirement for companies to register themselves with DOT for taking an OSP registration. This requirement has outlived its purpose and its time we allow free play to the enterprise customer who have set up their BPO / call center operations in India. Large chunk of business is shifting to other countries like Philippines, China, Americas due to these restrictive nature of service offering. India posses the technical edge in the form of skilled manpower and other real estate infrastructure, but with these Telecom restriction in place we are losing out on new opportunities that are likely to be shifted to other countries without there being sufficient Ease of Doing Business in India. We strongly urge DOT to remove the requirement of OSP registration or bring in clear and significant advantage to OSP customer.

Current Regulatory restriction for UCC / IPT

- i. OSP Regulation is the only regulation which allows a single EBPAX to be deployed for OSP having multi city presence within India. Otherwise going by the strict interpretation one would require PBX at each India office.
- ii. Even when OSPs are deploying single PBX, then how would the calls (signal) flow between various states for usage of single PBX has not been mentioned. One could even interpret it as an IP and PSTN interconnect (to limited extent), which is still restricted.
- iii. The requirement of CDRs to be maintained in concerned jurisdiction.
- iv. The OSP guidelines do not allow generation/storage of data (CDRs) outside India for calls (specially domestic).
- v. OSP guidelines do not explicitly allow signals (information relating to the call) to be sent out of India for domestic calls.

11. Encryption policy:

License condition for TSPs restricts users/customers to use 40 bit encryption and beyond that all users are required to take approval from DoT. Higher bit encryption is being used in many sectors and RBI also mandates for 256 bit and above encryption. In this regard, policy modification is pending for last 7-8 years. ACTO members strongly believe that a fast decisive step is required by Government to resolve this long pending issue.

12. Steps for increasing Foreign capital inflow:

The Finance Minister, in his budget presentation for the Financial Year 2017-18 had announced the closure of the Foreign Investments Promotion Board. We welcome this step taken as it attempts to remove another layer of approvals for the Telecom service License holders. However, though the FIPB stands closed, no transitional framework for replacing the FIPB has been announced by the government as of now. The FDI in Telecom is allowed upto 100 %. We would request the Hon'ble Authority that, for the benefit of the telecom sector, to either allow for automatic route for investments upto 100 %, instead of the present 49 % , in Telecom sector in a process under which the Licensor has only to inform the Nodal Ministry (Department of Telecom) the percentage of Foreign holdings or to have a single window, time bound clearance from the nodal ministry with minimal conditions attached. This will greatly help the Telecom sector to ramp up the foreign holdings and also to invite fresh induction of capital without having to go through long and circuitous processes thereby increasing the chances of boosting the inflow of foreign capital.

13. Services

(i) IP & PSTN Interconnect (Voice Conversion):

Currently telecom companies who are offering services to enterprise customers are facing issue to PSTN and VoIP call conversion issue. Most of the enterprise customer (specially call center etc) want a unified communication in all respect, where all kinds of calls can be made without regulatory constrain. Thus, an lease line customer should be able to call users in Mobile /PSTN in India, just they are able to do so for international destination.

If we look at it from global telecom perspective, the technology upgradation and conversion are moving very fast towards digitalization connectivity in many countries. Therefore, this is right time to allow PSTN and VoIP conversion and interconnection within India mainly for Enterprise Customers.

(ii) Unified communication

Currently OSP Regulation is the only regulation which allows a single EBPA to be deployed for OSP having multi city presence within India. While the regulation for regular customer stipulate PBX at each India office. While the technology today allows flexibility for customer to deploy a single PBX over vast geography (sometimes spread across continents). However some of the regulation, which were written many years back, when this particular scenario was not envisaged, restrict the deployment of Unified Communication in India.

There is a need to allow cloud based PABX (cloud infrastructure at location of choice of customer whether in India or outside India). These could be even shared amongst multiple customers with appropriate logical partition, whereby ensuring that the information of each customer is segregated and each customer has the freedom on his one setup for respective countries where they are present. These PABX would be accessed remotely by customer and for monitoring purpose as well for enterprise customers. They can meet up with all regulatory requirement in terms of logical separation, CDR storage, configuration log storage etc.

In addition Unified Communication brings many other reporting features into the table, like reporting with multiple parameter (regional, location, departmental reports), scalable up and down by click of button, higher capacity to store data (for longer period), billing, voice mail storage and retrieval etc. to name a few.

14. URL Blocking requests:

ISPs have been receiving lots of internet web portal URL blocking request. With time these request are close to fifty thousand URLs. Due to this huge list, the system are required to check every time with this database, thereby slowing the browsing. This may in terns affect the QoS. We have seen most of these are no longer in use after 6 -12 months timelines, as no user is able to access these sites due to the URL block.

The URLs blocking for more than 2 years may be removed from the blocking database by operators, thereby keeping the URLs number in check.

15. Multiple Audits:

Currently telecom company is required to conduct audit mainly Financial, ASR (account separation report), and Cost Audit conducted for Ministry of Company Affairs. The details of ASR and Cost Audit are very similar to each other. Operators are unnecessarily required to spend time and energy on a report which can be easily consolidated or one of them maybe removed, at least for companies not having huge turnover.

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