Association of Unified Telecom Service Providers of India

AUSPI/12/2017/018   14th June, 2017

Shri Sanjeev Banzal,
Advisor (Networks, Spectrum and Licensing),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
JawaharLal Nehru Marg,
New Delhi – 110002.

Subject: AUSPI's Response to the TRAI's Consultation Paper No. 5/2017 on 'Network Testing before Commercial Launch of Services'.

Dear Sir,

Please find attached AUSPI's Response to the TRAI consultation paper on 'Network Testing before Commercial Launch of Services'.

Thanking you,

Yours sincerely,

Ashok Sud
Secretary General
Mob: 9312941515

Encl: As above

Copy to :

1. Shri R S Sharma, Chairman, TRAI
2. Shri Anil Kaushal, Member, TRAI
3. Shri Sudhir Gupta, Secretary, TRAI

AUSPI'S Response to the TRAI consultation paper No. 5/2017 on Network Testing before Commercial Launch of Services

Q1. *Should a TSP be allowed to enroll subscribers as test users and in such case, should there be any restrictions on the number of test SIM cards and the period of such use? Please justify your response.*

AUSPI's Response:

(i)   At the outset, we would like to submit that there is a need to distinguish a new TSP commencing commercial operations, from an Existing TSP provisioning only additional services for its existing or new users/ subscribers. **Requirements of an existing TSP would be very different than the requirements of a new TSP from testing perspective and hence should not be linked with the issues raised in this Consultation Paper for Network Testing by a new TSP.**

(ii)   For a new TSP, provision of Test SIM cards that are issued for service/ network testing purposes is already there and is also in practice, however, at present, issuance of such cards is limited only to the employees and business partners of the TSP.

(iii)   **In case such test cards issued to employee and business partners are not in sufficient number to provide meaningful feedback of its service/network, TSP may be allowed to enroll additional subscribers as test users.** However, at any particular point in time, total active test SIMs including all categories should not exceed the prescribed limit.

(iv)   To keep a check on any misuse of such test cards and avoid any affect on other TSP's networks and services, a reasonable **limit on number of test SIM/ Users should be prescribed for the test period. The period of testing should not be more than Three (03) months.**

Q2. *To clearly differentiate test phase from commercial launch, which of the options discussed in Para 1.12 would be appropriate? Please provide justification. Please explain any other method that, you feel, would be more appropriate.*

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Q3. *Do you agree that the provisions discussed in Para 1.13 viz. information to the subscribers about test SIM being temporary etc., should be put in place for the TSP testing its network involving test users/subscribers? Please suggest other provisions which should be mandated during test phase?*

AUSPI's Response:

1. We agree that providing full-blown services during test phase may have implications on the IUC, Pricing, Reporting, QoS and other regulatory aspects. We would like to make following suggestions to deal with such issues:

   a. **A TSP should not be allowed to impose any kind of charging/tariff on users** during testing period and various obligations such as QoS, regulatory reporting etc should be waived off during the period.

   b. **Limit on number of active test SIMs and the time-period of testing needs** to be prescribed (see our response to Q1 above) to ensure bonafide use of such test cards. With **this in force, there is no need of limiting testing** only to a smaller geographical area of an LSA as suggested by TRAI in para 1.12.e.

   c. Period of testing and **terms & conditions of usage and disconnection should be transparently communicated to the test user** at the time of enrollment itself.

   d. **Test SIM Cards should not be allowed to be continued after commencement of commercial services by the TSP.**

   e. **A temporary number series in smaller chunk** as suggested by the TRAI in para 1.12.c and 1.12.d for testing purpose may be issued which will further ensure that test SIMs and Users are not converted to commercial users. Being a separate number series, identification of such numbers will also ease and resolve various inter-operator issues including MNP, billing etc.

Q4. *Is there a need to have a defined timeline for testing phase i.e. period beyond which a TSP should start offering commercial services? If yes, what should be the timeline? Please justify your response.*

AUSPI's Response:

Yes, as already suggested above, a timeline should be defined for testing phase subsequent to which commercial services can be commenced by a TSP. **Time period for testing should not be more than 3 Months.**

Q5. *In case enrolling of subscribers as test users before commercial launch is allowed, whether subscriber related conditions and regulatory reporting requirements laid down in the license, be imposed for the test subscribers enrolled before commercial launch? Please provide justification to your response.*

AUSPI's Response:

We suggest that the **testing phase of TSP should not be subject to any regulatory and financial obligations except the requirements of Law Enforcement Agencies and Subscriber Verification** for activation of a connection.

Q6. *Should test users/subscribers of such licensees be given the facility of MNP? Please justify your answer.*

AUSPI's Response:

(i) MNP facility cannot be extended to test users as this being a facility opted by subscriber mainly for commercial or quality of service related considerations.

(ii) Further, **allocation of dedicated temporary number resource is suggested for testing (please refer our response to Q1 & Q2 above) which is returnable to DoT after the testing phase** is completed, facilities such as MNP cannot be allowed for such numbers.

Q7. *If there are any other issues/suggestions relevant to the subject, stakeholders may submit the same, with proper explanation and justification?*

AUSPI's Response:

Network Testing by Licensee or prior approval from Licensor should not be made mandatory before commercial launch of services or products and the same should be left to the discretion of the TSP. This will avoid unnecessary delays in launch of services.

As already suggested above, there is a need to distinguish a new TSP starting commercial operation, from an existing TSP provisioning only additional services for its existing or new users/subscribers. Requirements of an existing TSP would be very different than the requirements of new TSP from testing perspective and hence should not be linked with the issues raised in this Consultation Paper for Network Testing by a new TSP.

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