


Regulation Cell, Room no. 504, 5 th Floor, Bharat Sanchar Bhawan, Janpath, New Delhi - 110001 Tel. : 011 - 23734081-82 e-mail : agmregln@gmail.com	 भारत संचार निगम लिमिटेड (भारत सरकार का उपक्रम) BHARAT SANCHAR NIGAM LIMITED (A Govt. of India Enterprise)
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To,

Shri Akhilesh Kumar Trivedi,
Advisor (Networks, Spectrum and Licensing),
TRAI, New Delhi.

No. BSNLCO-RGLN/25/3/2023-REGLN dated 29.05.2023

Sub: Comments of BSNL on Consultation Paper on Definition of International Traffic.

Please find below the comments of BSNL on Consultation paper on Definition of International Traffic,

Q1. Whether it would be appropriate to define the term 'international traffic' in the telecommunication service license agreements as 'the international long-distance traffic originating in one country and terminating in another country, where one of the countries is India'? Kindly provide your response with a detailed justification.

BSNL Comments: Yes, in the perspective of India, the International traffic should be the International long-distance traffic originating from any other country and terminating in India or vice-versa.

Q2. In case your response to the Q1 is in the negative, kindly provide an alternative definition along with a detailed justification.

BSNL Comments: N/A

Q3. Since the terms 'Inter circle traffic' and 'Intra circle traffic' are already defined in the telecommunication service license agreements, whether there is still a need to define the term 'domestic traffic' in the telecommunication service license agreements? If yes, what should be the definition of the term 'domestic traffic'? Kindly provide your response with a detailed justification.

BSNL Comments: There is no need to define the term 'domestic traffic' in the telecommunication service license agreements as the terms 'Inter circle traffic' and 'Intra circle traffic' covers the entire domestic traffic.

Q4. Whether there are any other issues/ suggestions relevant to the subject? If yes, the same may kindly be furnished with proper justification.

BSNL Comments: Broadly, the Telecom traffic consists of voice call and SMS. Para 5 of Chapter-XI (International Long Distance Service) of Unified License provides for Network Interconnection Topology. As per existing licensing framework, the International Telecom Traffic should be routed in a way as prescribed in UL. This arrangement seems to be fine as far as voice traffic is concerned. However, with devise of new technologies, the Principal Entities/ Telemarketers are exploiting the other means (through the world of INTERNET) to fetch the Text Messages to Indian market bypassing the prescribed Network Interconnect in UL. In reality, such text messages are generated outside India but brought into India bypassing the Telecom Network Interconnection. Subsequently, these messages are delivered through domestic route in Indian.

Similarly, for outgoing International SMSs, the Tele-Marketers (TMs) in India collect the SMS traffic from the PEs and carry the same outside country bypassing the ILD interconnect network of telecom operators in India.

This issue need to be addressed through this consultation process. As also indicated in DoT communication to TRAI dated 30.08.2022.



29.05.2023
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