

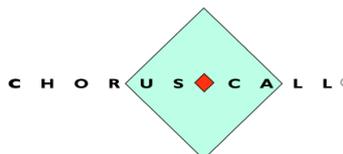
CHORUS CALL CONFERENCING SERVICES (I) PVT LTD

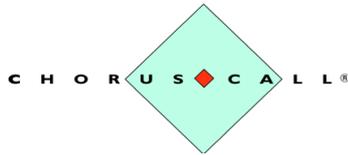
Comments on the Consultation Paper on Review of Voice Mail/ Audiotex/ Unified Messaging Licence

Consultation Paper No. 12/2016

Jerry Bindra

July 11, 2016





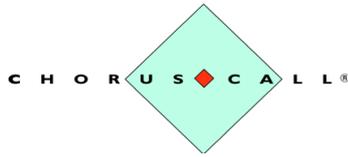
Chorus Call Introduction

Chorus Call Conferencing Services (I) Pvt Ltd is a subsidiary of Chorus Call Inc. We currently hold an Audiotex license No 846-70/2006-VAS-1 dated 10/07/2007 for Service Area Mumbai. We provide audio conferencing services. This is our core business and we are completely focussed in offering world class services to our customers through a dedicated team of professionals who are experienced in managing unique customer requirements to facilitate their audio conferences for various business applications.

The Parent company is headquartered in Pittsburgh (USA) and has been in the business for almost 45 years. We have a global presence with centres across 6 continents and our customers are spread across the world.

We have a 24x7x365 days helpdesk support that we offer our customers to address any queries or challenges with regards to availing our services.

In order to facilitate audio conferences, we have deployed a carrier grade audio conferencing bridge which is connected to the PSTN using E1 PRI connections from Basic telecom operators. All connections to our audio conferencing bridge is routed directly through E1 PRI lines (without any external gateway) and as such we are dependent on the telecom network provided by Telecom Operators. In addition to E1 PRI lines, we also avail other access services, such as Domestic Toll Free Service, International Toll/ Toll Free access. All these services are also provided by telecom operators.



Issues for consultations

We have responded to questions which pertain to Audio conferencing services only

Q5:

Currently Audio Conferencing Service is offered as part of the Audiotex license. There are various other services which are provided by different service providers under this license. All these services (including Audio Conferencing) are platform based and are offered through the telecom network of Basic operators.

Audio Conferencing Services are currently being offered by various companies in India. They can be broadly grouped under the following categories

1. Telecom Operators
2. International Audio Conferencing Service Providers
3. Domestic Audio Conferencing Service Providers
4. Tele-marketing, IVR and IP Telephony Service Providers
5. Aggregators of international access services.

Amongst these only International/Domestic Audio Conferencing Service Providers are focussed predominantly on audio conferencing services. The other players offer audio conferencing services as one of the many other services that they have in their portfolio.

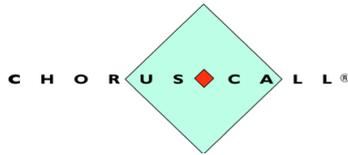
Since Audio Conferencing is mainly an enterprise service required for business meetings; the level of service and attention expected by the customers/ users is very high. This is one of the reasons why world-over the largest audio conferencing service providers are those who are dedicated to this business.

We have seen that even in India, the combined market share of International/Domestic Audio Conferencing Service Providers is more than the market share of Telecom operators.

Based on this, we believe that in order to ensure that customers/ users continue to experience world class services at competitive prices; it is important that policies are drafted to encourage a healthy ecosystem which takes into consideration the long term interests of all types of service providers, especially small and medium sized companies.

The market size for these services is much smaller as compared with that of Universal Telecom services. As a result obligations under USL cannot be imposed on service providers offering Platform based services.

Hence it is important that Audio Conferencing Services should not be merged with Unified License and should be governed under a separate license.



Q6:

In consideration of the technological advancements it is important to review the technical specifications for providing Audio Conferencing Services. Customers are now increasingly demanding collaboration communication solutions, which includes not just plain audio conferencing service but also require web collaboration, video conferencing and streaming services to be included in the service portfolio of conferencing service providers.

We maintain that any service offered should not result in any kind of Toll By pass of a licensed telecom operator. Keeping this in mind we would like to propose the following key technical requirements

1. Video Conferencing Services should be permitted to be offered as a bridging service through regular ISDN and IP connections.
2. Web collaboration should be permitted in a way where users can share desktop, PPT, applications, etc. over an internet connection along with audio conferences
3. Internet streaming services should be permitted, if it is part of a conferencing collaboration solution.

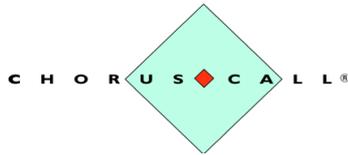
Q9:

As explained earlier we are of the view that Conferencing Services should not be included in the regime of Unified License because

1. The services are platform based and are completely dependent on the network of the basic telecom operators
2. It is critical to have dedicated service providers for these services so as to continue to maintain high quality of customer service to end users at competitive prices.
3. The market size for these services is very small in comparison with the market for basic telecom services and hence there is no business justification to compare the licensing fees and other obligations between the two service types.

Q.11:

As mentioned earlier we believe that Voice Mail/Audiotex services should not be made part of the Unified Service license. However the DOT may consider enhancing the technical specifications for services which can be offered as conferencing services and include as Video Conferencing, Web conferencing, Streaming, etc. An enhanced service portfolio for conferencing services can then help to justify levying an Entry fee. Also this will ensure to filter out those who are not serious players. We recommend an entry fee of Indian Rupees Thirty Lakhs (INR 30, 00,000/-) for each service area.



Q12:

In order to ensure that only serious players with a long term view enter this service; DOT may consider a basic requirement of Minimum Networth of Indian Rupees Two Crores Fifty Lakhs (INR 2,50,00,000) and Minimum Equity of Indian Rupees Two Crores Fifty lakhs (INR 2,50,00,000).

Q13:

In case DOT decides to levy Annual License fees in terms of Revenue share, these operators should be allowed a set off of such amount paid on purchase of telecom services like in the manner of excise, and cenvat credit in case of service tax. Further, since there has been no such levy imposed currently; the Conferencing service providers should be allowed to transparently pass on these charges to the customers on the same lines as Service tax and other levies imposed by the government. Further any such change should not be made retrospectively

Q14:

Definition of AGR should be total revenue earned from conferencing services (not including other income) minus direct cost (telecom costs and other direct costs such as transcription service costs, equipment rental, etc) incurred to provide the services.

Q15:

Requirement of Performance Bank Guarantee, Financial Guarantee and Application Processing fees for VM/Audiotex/UMS authorisation can be reasonably increased from the current levels to ensure that only serious players are active.

Q16:

There is no need for migration and as such the services should continue to remain under a standalone license.

Q17:

As stated earlier, Conferencing Services should not be merged with Unified licenses unless the market size for conferencing services grows substantially to justify the stringent financial requirements imposed on USL holders.

Q19:

Since conferencing services will remain under a standalone license; this situation will not arise.