



11 July 2016

To

Shri U K Srivastava
Pr. Advisor (Networks, Spectrum and Licensing)
Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi 110002

Dear Sir,

Sub: Consultation Paper on Review of Voice Mail / Audiotex / Unified Messaging Services Licence - Response from Door Sabha Nigam Limited

Door Sabha Nigam Limited (DSNL) is an audio conference service provider operating under the Audiotex Licence. We are receipt of the above Consultation Paper and we submit our responses as below.

As far as Audio conferencing service is concerned, there is no need for licencing, for the following reasons:

- (a) As per NTP-99, except for access service providers, other providers that use access networks are not to be licenced.
- (b) The service is already provided over licenced, regulated telecom networks, and a second licence is not warranted.
- (c) Conferencing is a multiplier service that can help telecom consumers make better use of telecom resources.
- (d) Conferencing is an “enabler / content” service, and as per policy, such services should be liberally allowed.
- (e) The requirement of licences is hampering the entry of new players and entrepreneurship, curbing development of the industry, competition and innovation.

...2

- (f) Conferencing can also act as a catalyst in helping the country realise the objectives of initiatives such as Smart Cities and Digital India. A liberal policy will enable more players offering innovative services.

Our detailed item-wise response is in the annexure attached to this letter.

Thanking you for your kind consideration,
With regards,

R Srivatsan
Chief Operating Officer
Door Sabha Nigam Ltd

**Detailed Response to Consultation Paper
on Review of Voice Mail / Audiotex / Unified Messaging Services License**

Q No	Question	DSNL's Response
1	In view of the discussion in Para 2.13, is it necessary to have a separate standalone licence for Voice Mail Service? If so, why? Please provide detailed justification?	-
2	If the answer to the Q1 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?	-
3	In view of Para 2.17 and present technological developments, is it necessary to have a separate standalone licence for only Audiotex Service? If so, why? Please provide detailed justification?	There is no need to licence Audiotex services. These are provided over licensed, and regulated, telecom services. This will also be In line with the policy of keeping content services out of licence regime, as explained in Paragraph 2.4 of the Consultation Paper.
4	If the answer to the Q3 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?	-

Q No	Question	DSNL's Response
5	Whether there is a need for standalone licence for providing Audio Conferencing Service? If yes, whether the technical specifications need to be explicitly defined? Please provide detailed justification?	<p>There is no need to licence Audio Conferencing services. These are provided over licenced, and regulated, telecom services. It is superfluous to impose licencing regulation on a service that depends on an already licenced telecom service.</p> <p>There cannot be a license for services that use services provided by licensed operators. If services are to be monitored for possible violation of regulations, this can be done by licensed operators whose services are being used</p>
6	If the answer to the Q5 is in the affirmative, what should be the technical specifications for providing Audio Conferencing Service?	<p>Telecom networks already follow technical specifications laid down by DoT/TRAI. Audio Conferencing uses telecom resources which are already governed by these specifications.</p> <p>Delivery of conferencing services should be outside the purview of any specifications, as imposing specifications will hamper delivery of innovative, customer-friendly, and cost-effective services</p>
7	Is it necessary to have a separate licence for Unified Messaging Service when holding an ISP licence is mandatory to provide the Unified Messaging Service and standalone ISP licensee is also allowed to provide Unified Messaging Service? If so, why? Please provide detailed justification?	-

Q No	Question	DSNL's Response
8	If the answer to the Q7 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?	-
9	In case Voice Mail/Audiotex/Unified Messaging Service requires a licence should they be made a part of the Unified Licence as one of the services requiring authorisation? Please provide detailed justification?	Inclusion of value-added and content services in Unified Licence will restrict the service to the ambit of large operators alone, leading to monopolistic business practices. Smaller players offering individual services should be encouraged through a liberal policy, which will encourage innovation and competition
10	If the answer to the Q9 is in the affirmative, what should be Service Area? Whether Service Area may be similar to the Service Area of ISP (National Area, Telecom Circle/Metro Area, Secondary Switching Area) to bring in uniformity among the Service Areas of different services? Please provide detailed justification?	<p>Since conferencing is a national/international service, there should not be any geographic restriction.</p> <p>As participants can be from any part of the country or the world, the current policy of SDCA-based licencing does not serve any useful purpose.</p>
11	If Voice Mail/Audiotex/Unified Messaging Services is made a part of the Unified Licence as one of the services requiring authorisation, then what should be the Entry Fee?	-

Q No	Question	DSNL's Response
12	Whether there should be any requirement for Minimum Net worth and Minimum Equity for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?	These pre-requisites will lead to monopolisation, as only large corporates shall fulfil the eligibility conditions. This will restrict smaller, innovative operators from offering similar services.
13	The annual licence fee for all the services under UL as well as for existing UASL/CMTS/Basic Service/NLD/ILD/ISP licensees have been uniformly fixed at 8% of AGR since 1st April 2013. Whether it should be made same for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence? If not, why?	Voice Mail/Audiotex/UMS services are supplementary, content-delivery services and these should be excluded from AGR calculations. Their inclusion would lead to double-charges, as the underlying telecom services are already considered for AGR calculations.
14	In case the answer to the Q13 is in the affirmative then what should be the definition of AGR for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?	-
15	What should be Performance Bank Guarantee, Financial Bank Guarantee and Application Processing Fee for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?	These pre-requisites will lead to monopolisation, as only large corporates shall fulfil the eligibility conditions. This will restrict smaller, innovative operators from offering similar services.

Q No	Question	DSNL's Response
16	Whether the duration of the licence with Voice Mail/Audiotex/Unified Messaging Services authorisation be made 20 years as in the other licence authorisations under Unified Licence? If not, why?	Unified Licence holders can provide services as long as their licence is valid.
17	What should be the terms and conditions for the migration of the existing Voice Mail/Audiotex/Unified Messaging Services licensees to Unified Licence?	There should be no mandatory migration of licences to Unified Licence. This will restrict the service exclusively to the ambit of large operators, leading to monopolistic business practices. Smaller players offering individual services should be encouraged through a liberal policy, which will further encourage innovation and competition.
18	Whether the existing Voice Mail/Audiotex/Unified Messaging Services licensees may be allowed to continue or it would be mandatory to migrate to the Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?	There should be no mandatory migration of licences to Unified Licence. Existing Audiotex licence should be liberalised or deprecated.

Q No	Question	DSNL's Response
19	What should be the annual licence fee for existing Voice Mail/Audiotex/Unified Messaging Services licensees who do not migrate to the Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?	No licence is required, and thus no licence fee is required.
20	Please give your comments on any related matter, not covered above	<p>(a) As per NTP-99, only access service providers such as mobile, long distance carriage and international carriage are to be licenced. All other service providers are to be allowed to operate by using infrastructure provided by various access providers. No licence fee is to be charged but registration for specific services being offered is required. These service providers are not to infringe on the jurisdiction of other access providers and they are not to provide switched telephony. Conferencing service is such a value added service, and thus, as per NTP, this does not require a licence.</p> <p>(b) Conferencing is essentially a telecom based enabler service, and as per policy, a liberal approach is to be followed to allow such services.</p> <p>(c) Conferencing service is not a stand-alone service. It has to be provided over licenced, regulated telecom networks, and a second licence is not warranted.</p> <p>(d) The requirement of licences is</p>

Q No	Question	DSNL's Response
		<p>hampering the entry of new players and entrepreneurship, curbing development of the industry, competition and innovation.</p> <p>(e) A liberal policy towards conferencing service is required to enable small companies to also start using such services, which is restricted to large corporates only.</p> <p>(f) Conferencing is a multiplier service, which transforms the traditional one-to-one telephone call into a multi-party conversation, and thus can help the Government, Businesses and even retail telecom users make effective use of telecom resources</p> <p>(g) Conferencing can act as a catalyst in helping the country realise the objectives of initiatives such as Smart Cities and Digital India and a liberal policy will enable more players offering innovative, industry- and segment-specific services across all areas of the country.</p>