Ease of Doing Telecom Business In India

Comments on Consultation Paper dtd. 14 March 2017

3. In addition, there can be processes in other areas which may be requiring simplification. In view of the above, the stakeholders are requested to identify such areas of concern and review the existing processes and suggest mechanisms that ease the business activity.

Sir,

Many Application Services today are built on Automation as a foundation and provided as enterprise services on top of the telecom services provided by Access Providers. These Application Services are broadly classified as Over-the-Top (OTT) or Value Added Services (VAS). Such services do not compete with Access Providers, but actually add to the revenues of Access Providers by providing innovative, many times innovative technology/telecom driven Automation solutions.

Both Customer Service Automation companies and OSP related business have complementary existence in the gamut of Application Services. These may be provided by BPOs by using man-power / human positions or by Automation companies using their intellectual property / know-how to provide self-service tools with optional escalation to human positions for complex interactions. Recent articles[1] in the Economist mention *Bots* or *Automation* or *Software Robots* as call centers of the future. Automation results in increase in employment opportunities, human skill levels, economic and industrial growth and higher productivity.

Our first submission is that the Authority considers parity in guidelines between OSPs and providers of Application Services through Automation. *We request that the Authority considers services delivered on top of licensed services to not be subject to a second level of licensing conditions.* Albeit, they may be subject to Authorisation or Registration Guidelines Conditions to prevent misuse.

Our second submission is a request for *consistency across recommendations issued on the same subject in different consultation papers from time to time*. This will enable clarity at all levels, fewer ambiguities and add vastly to the ease of doing business.

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[1] The end of the line, in the Economist (6th February, 2016) and Automation and anxiety, in the Economist (25th June, 2016)

Application Services on telecom infrastructure have tremendous potential and can make India truly at the fore-front of a connected and unified communications economy. An enabling regulatory framework that fosters competition and innovation will help businesses with innovative solutions to scale themselves at an Indian and global level.

Yours truly,

Ujwal Makhija
Managing Director

25th April, 2017, Vadodara