

**RCL/TRAI/LT/19-20/5973**  
**27<sup>TH</sup> June-2019**

**Shri S.K.Singhal,**  
Advisor (BB & PA)  
**Telecom Regulatory Authority of India**  
Mahanagar Doorsanchar Bhawan,  
Jawaharlal Nehru Marg,  
**New Delhi - 110 002**

**Subject : RCOM response to the Consultation Paper "Review of the  
Regulatory Framework for Interconnection"**

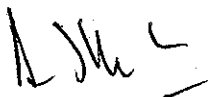
**Sir,**

Kindly find enclosed herewith RCOM response to the Consultation Paper "**Review of  
the Regulatory Framework for Interconnection.**"

It is requested that same may kindly be taken in to consideration.

Thanking you,

**Yours sincerely,**  
**For-Reliance Communications Limited**



**Amit Mathur**  
Exec. Sr. Vice President  
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**Encl : As above.**

**RELIANCE**

**Comments on TRAI Consultation Paper  
on  
“Review of the Regulatory Framework for  
Interconnection”**

Reliance Communications Ltd welcomes opportunity extended to comment on the above captioned consultation paper.

**RCOM's specific comments on issues raised in the consultation paper are given below:**

**Executive Summary:**

- Legacy regulatory framework of interconnection in wire line which mandate multilevel interconnection in a Licensed Service Area with the incumbent Wireline operator ,is acting as deterrent for the TSPs to make inroads into wireline business.
- Telecom networks are moving to IP based networks with operators deploying IP based Class 5 switches
- DOT had made license amendment on 19<sup>th</sup> April-2016 which permits IP based interconnection.
- DOT has already amended the License conditions on 23<sup>rd</sup> June-2017 which has allowed the TSP to install Main Switching Center anywhere in India subject to interconnection point being located and operated in respective service areas.
- The License amendments make it feasible to have interconnection between the wire line network at the level above the LSA.

**RCOM's specific comments on issues raised in the consultation paper are given below:**

**Q1. Whether the flexibility be provided to interconnecting operators for interconnecting PSTN to PSTN networks at SDCC/ Level II TAX (SSA)/ Level I TAX (LSA) levels as per their mutual agreements? If no, then justify your comments with reasons**

**&**

**Q2. In case of no mutual agreement between the operators, what should be the level of interconnection for interconnecting PSTN to PSTN networks be mandated in the Regulations.**

The legacy network of BSNL / MTNL requires POIs at multiple levels and also compels other operators to deploy infrastructure to having the interconnection at these levels.

Since switching is already getting centralized at regional level and with IP based networks, it is high time to have centralized approach towards interconnection between

wireline networks. Private operators are already interconnecting their Wireline networks at one location within a service area.

Flexibility should be provided to TSPs to interconnect at Region level( Region could be combined of many LSAs).This will improve operational efficiencies give greater flexibilities to TSPs.

In case of no mutual agreement is reached between the operators , interconnection should be at the level 1 TAX location and carriage charges should be done away as all TSP have upgraded their core network to IP based and carriage cost in IP based network is significantly low. A telecom circle wise network with single location POI ( local, NLD & ILD ) per circle be mandated to ease out PSTN to PSTN connectivity.

**Q3.Any other issue you would like to bring to the attention of the Authority.**

The below issues need to be considered to encourage Wireline rollout:

- a) The transit charge should be done away with.
- b) Doing away with port charges and Colocation and Infrastructure charges at least for Wireline operators..