

*Chapter-III Issues for Consultation*

*Q1. 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? YES*

**Simple VOICEMAIL(VMS) has evolved in developed markets to Call Management and Call completion which allows users to manage an incoming call based on caller id and status of the caller (driving, busy-in meeting, out of country/town, time of day etc)**

- 1. To Secretary/Some one else in the office based on CallerId**
- 2. To Home/Spouse**
- 3. To Voice Mail**

**VOICEMAIL(VMS) is one of the last options when call cannot be directed to anybody else or cannot be answered. International callers except that call will end in VoiceMail as last resort.**

*Q2. 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?*

**VoiceMail License should be broad based to include any kind of value added voice service.**

**It would be very restrictive to define the scope of the license it is best to leave it open ended as any value added voice service which can be offered by using facilities/resources from other UL licenses but not infringing on the any other UL license which exist (Access/NLD/ILD/VoIP etc).**

*Q3. 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? YES*

**Similarly AUDIOTEX(ATS) has evolved to a virtual call center/PBX on cloud for Business use by allowing calls be routed to the best office/branch/person to address the callers query based on his callerId and option caller chooses through IVR. While VMS caters to individuals need ATS service is more suitable for business users/corporate.**

*Q4. 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?*

**Audiotex License should be broad based to include any kind of value added voice service.**

**It would be very restrictive to define the scope of the license it is best to leave it open ended as any value added voice service which can be offered by using facilities/resources from other UL licenses but not infringing on the any other UL license which exist (Access/NLD/ILD/VoIP etc).**

*Q5. 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? **NO***

**Currently it is covered in the ATS technical specification. It can be covered under the scope or VMS/ATS as Voice Based Value added service. Creating a new license will require all existing VMS/ATS to obtain a new or amend their existing license.**

*Q6. If the answer to the Q5 is in the affirmative, what should be the technical specifications for providing Audio Conferencing Service?*

**It would be wrong to have licenses based on specific value added services as the basket of Value Added Service one can offer is very large and technology and services are continuously evolving at a rapid pace.**

**As suggested by TRAI in the past and also by other countries these are Service Based/Application Services and not Facilities Provider. Most of the facilities based services are covered in the existing UL. It can be covered as value added voice service which can be offered by using facilities/resources from other UL licenses but not infringing on the any other UL license which exist (Access/NLD/ILD/VoIP etc).**

*Q7. 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? **NO***

**UMS service requires an internet connection to transmit messages, by using an internet connection one does not become an ISP-Internet Service Provider. So the condition to obtain an ISP to offer UMS was illogical in the first place and it should be removed.**

**For effective delivery of Voice Based Value added services or any value added service it requires interconnection with Internet.**

**Ex A missed call alert can be sent on email/whatsapp/any messenger or SMS.**

**A conference user can see on a mobile app who have joined the conference, who is speaking.**

**In 2000 when UMS was proposed it allowed VMS/ATS operators to connect to the Internet. Internet was a big threat to Voice By pass and it came with a condition that opting UMS (internet connection) meant losing dial out capabilities.**

**In 2016 we have passed this threat point and having a separate category for UMS is in question.**

**It can be covered as part of larger Value Added Service license encompassing VMS/ATS/UMS etc and leave it open ended as any value added voice service which can be offered by using facilities/resources from other UL licenses but not infringing on the any other UL license which exist (Access/NLD/ILD/VoIP etc).**

*Q8. 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?*

**It would be very restrictive to define the scope of the license it is best to leave it open ended as any value added Voice and DATA service which can be offered by using facilities/resources from other UL licenses but not infringing on the any other UL license which exist (Access/NLD/ILD/VoIP etc).**

*Q9. 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? YES*

**It can be done as a new category in UL as Value Added Services.**

*Q10. 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?*

**It can be done in line with UL(ISP) with FBG of 3 lakhs for SSA and increase it for National Area. Instead of having multiple license one license can cover the area of coverage.**

*Q11. 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?*

**As No Entry Fee exists today it should left as is “ZERO”**

*Q12. Whether there should be any requirement for Minimum Net worth and Minimum Equity for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?*

**As No such condition exists today it should left “OPEN”**

*Q13. 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?*

**Currently there is no License fee, To encourage Value Added Service and to continue with current policy it should be left at “ZERO”. Please note that the facilities/resources taken from UL is already suffering a 8% LF. It is the Value Add-AGR that can be subject to LF. This will also increase the administrative work both for the licensor and the licensee. Best to be left as is at “NIL”.**

*Q14. 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?*

**Same as for other UL (licenses) as % but annual minimums equal to processing fee.**

*Q15. What should be Performance Bank Guarantee, Financial Bank Guarantee and Application Processing Fee for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?*

**Current FBG at 3 lakhs can continue.**

*Q16. 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?*

**Can be made 20 years in line with other UL**

*Q17. What should be the terms and conditions for the migration of the existing Voice Mail/Audiotex/Unified Messaging Services licensees to Unified Licence?*

**Simple Authorisation without any financial implication as it will encourage all to migrate to the new UL regime and licensor does not have to deal with old (non UL) and new UL licenses.**

*Q18. 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?*

**Simple Authorisation without any financial implication as it will encourage all to migrate to the new UL regime and licensor does not have to deal with old (non UL) and new UL licenses.**

*Q19. 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?*

**Currently there is no License fee, To encourage Value Added Service and to continue with current policy it should be left at “ZERO”. Please note that the facilities/resources taken from UL is already suffering a 8% LF. It is the Value Add-AGR that can be subject to LF. This will also increase the administrative work both for the licensor and the licensee. Best to be left as is at “NIL”.**

*Q20. Please give your comments on any related matter, not covered above.*

**The NTP 1994/99 licenses came with 7 digit number allocation 93X-YYYY which was changed to 1703X-YYYY. 10 digit numbering should be provided for effective delivery of service so numbers can be allocated to subscribers.**

*Q20. Please give your comments on any related matter, not covered above.*

**The restrictions imposed on VMS/ATS operators by restricting to a single operator when providing dial out is illogical and has no relevance. Of the conditions imposed in amendment No 846-38/96 Dt 26.08.2004 clause 22.1 needs to be removed as it serves no purpose.**

With drop in domestic rates between 2004-2008 the option for an VMS/ATS operator to bypass a licensed carrier and offer lesser rates within the country is not possible.

With advent of OTT services all individuals, business and corporate users who want to bypass ILD operators can conveniently do so by using OTT apps.

There was no restriction for Dial Out in the NTP-1994 VMS/ATS license. In the NTP-1999 license as UMS was added Dial Out was not allowed for UMS but the condition was not applicable to VOICEMAIL(VMS)/AUDIOTEX(ATS). In licenses issued after 2001 for VOICEMAIL(VMS)/AUDIOTEX(ATS) the restriction on DialOut was deleted i.e dialout was freely allowed for VMS/ATS. It was only applicable for UMS as it allowed interconnection of equipment to both PSTN/PLNM and Internet.

*Page 8 & 9 of Consultation paper.*

*2.6 Pursuant to the announcement of New Telecom Policy, 1999(NTP-99) and on the basis of TRAI's recommendations dated 29<sup>th</sup> December 2000, the guidelines in respect of Voice Mail/Audiotex/Unified Messaging Services were issued vide DoT letter No. 846-53/2000-VAS dated 16<sup>th</sup> July 2001.*

*4. For Unified Messaging Service, transport of Voice Mail Messages to other locations and subsequent retrieval by the subscriber must be on a non-real time basis. To ensure this licensee shall ensure that there is no dialing out for delivery of the message to the recipient.*