INDUSIND MEDIA AND COMMUNICATIONS LTD.

TRAI's Consultation Paper
Issues related to Internet Telephony

Responses from IndusInd Media and Communications Ltd. (Internet Division)

4.1 Whether Internet service provider should be permitted Internet Telephony services to PSTN/PLMN within India? If yes, what are the regulatory impediments? How such regulatory impediments can be addressed? Please give your suggestions with justifications. (Para 3.10)

4.1   ISP's should have the first right to be permitted for Internet Telephony Services to PSTN/PLMN within India.

With regards to the License fees; the UASL licensee is into many more modes of Business other than VoiP and thus the Rs. 100 crores license should not be associated with VoiP services.

In a similar manner a NLD operator license fee of Rs. 2.5 cores cannot be associated as a point towards not being a level playing field for VoiP services as they have many other Business Areas also for which they have actually taken a NLD license.

All three license holders should be allowed to connect to PSTN and PLMN by having no change whatsoever on their License fees, Structure of License or any other extra payments to be made by the ISP's with regards to any License up gradation of any kind.

4.2 Whether allowing ISPs to provide Internet Telephony to PSTN/ PLMN within country will raise issues of non-level playing field? If so, how can they be addressed within present regulatory regime? Please give your suggestions with justifications. (Para 3.11)

4.2   Allowing ISP's to provide Internet Telephony will not raise issues of a non – playing field. The regulatory body can handle the situation in this manner.

With regards to the License fees; the UASL licensee is into many more modes of Business other than VoiP. The points discussed above are similar for this too.

4.3 ISPs would require interconnection with PSTN/PLMN network for Internet telephony calls to PSTN/PLMN. Kindly suggest Model/ architecture/ Point of Interconnection between ISPs and PSTN/PLMN? (para 3.12)

4.3 The ISP's can have interconnection agreements with the Telecom Players for the same, in the same way as the inter operator connection in PSTN /PLM.

4.4 Please give your comments on any changes that would be required in the existing IUC regime to enable growth of Internet telephony? Give your suggestions with justification to provide affordable services to common masses? (para 3.12)

4.4 No Change.

4.5 What should be the numbering scheme for the Internet telephony provider keeping in view the limited E.164 number availability and likely migration towards Next Generation Networks? Please give your suggestions with justifications. (para 3.13)

4.5 Even if there is a problem with a scheme of numbering the ENUM (Telephone Number Mapping) which is a globally adopted methodology can be used effectively. The numbering system should be the same as the current PSTN format so that it gets easier tomorrow even for portability(whenever that regulation is passed)

4.6 UASL and CMTS operators are allocated number resources and permitted to provide Internet telephony including use of IP devices/Adopters. Whether such devices should be allocated E.164 number resource to receive incoming calls also? If so, whether such number resources should be discretely identifiable across all operators and different than what is allocated to UASL and CMTS to provide fixed and mobile services? Give your suggestions with justifications? (Para 3.4)

4.6 **The best solution will be to use the same numbering scheme as is allocated to UASL and CMTS to provide fixed and mobile services. There should be number portability also so that the transition happens smoothly. The telephone number mapping will be able to identify each device/adapter individually.**

4.7 If ISPs are allowed to receive Internet telephony calls on IP devices/ Adopters, what numbering resources should they be allocated? (para 3.13)

4.7 **The numbering scheme of the UASL AND the CMTS should be opened up for ISP's also.**

4.8 Is it desirable to mandate Emergency number dialing facilities to access emergency numbers using internet telephony if ISPs are permitted to provide Internet telephony to PSTN/PLMN within country? If so, Should option of implementing such emergency Number dialing scheme be left to ISPs providing Internet telephony? Please give your suggestions with justifications. (para 3.14)

4.8 **The emergency number dialing option should be left to ISPs to decide.**

4.9 Is there any concern and limitation to facilitate lawful interception and monitoring while providing Internet telephony within country? What will you suggest for effective monitoring of IP packets while encouraging Internet telephony? Please give your suggestions with justifications. (para 3.15)

4.9 **LIM conditions that are applicable to Data may be same as IP calls too for an ISP.**

4.10 Is there a need to regulate and mandate interoperability between IP networks and traditional TDM networks while permitting Internet telephony to PSTN/PLMN within country through ISPs? How standardization gap can be reduced to ensure seamless implementation of future services and applications? Please give your suggestions with justifications. (para 3.16)

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4.10 There is no need to regulate the interoperability between IP networks and TDM networks while permitting Internet Telephony to PSTN /PLMN within the country through ISP's. The present costs of devices are low and the commercial interoperability will exist.

4.11 Is there a need to mandate QoS to ISPs providing Internet telephony to PSTN/PLMN within country? Please give your suggestions with justifications. (para 3.17) 35

4.11 VoIP services Qos parameters are very widely dependent on the broadband or the internet connection. However the bare minimum requirements may be specified.

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