

VTL/Reg/TRAI/1709/5236  
5<sup>th</sup> September, 2016

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**Subject: VTL Response on Consultation Paper on “Internet Telephony (VOIP)”**


**Ref: TRAI Consultation Paper No. 13/2016 dated 22<sup>nd</sup> June, 2016**

Respected Madam:

Videocon Telecommunications Limited welcomes the opportunity to give our comments to TRAI's consultation Paper on “**Review of Voice Mail/Audiotext/Unified Messaging Services Licence**” Please find attached herewith our response on the same.

This is for your information and kind consideration please.

Kind Regards



**Meena Bisht**  
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*Encl.: as above*

VTL Response to Consultation Paper

on

‘Internet Telephony (VOIP)’

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**Q1: What should be the additional entry fee, Performance Bank Guarantee (PBG) and Financial Bank Guarantee (FBG) for Internet Service providers if they are also allowed to provide unrestricted Internet Telephony?**

**Response:** For UL-AS License holder, there should not be any separate PBG and FBG.

**Q2: Point of Interconnection for Circuit switched Network for various types of calls is well defined. Should same be continued for Internet Telephony calls or is there a need to change Point of Interconnection for Internet Telephony calls?**

**Response:** Both SS#7 and SIP interface should be allowed for interconnection with other operator.

**Q3: Whether accessing of telecom services of the TSP by the subscriber through public Internet (internet access of any other TSP) can be construed as extension of fixed line or mobile services of the TSP? Please provide full justification in support of your answer.**

**Response:** Internet telephony should be allowed in case of both fixed line and mobile service provider.

**Q4: Whether present ceiling of transit charge needs to be reviewed or it can be continued at the same level? In case it is to be reviewed, please provide cost details and method to calculate transit charge.**

**Response:** Present ceiling of transit charges should continue to remain the same incase of internet telephony as well. In both the cases, network resources are used and hence, transit charges should be levied as it is.

**Q5: What should be the termination charge when call is terminating into Internet telephony network?**

**Response:** Incase of DSL based fixed line internet access, the charges should be zero however in case of mobile internet, it should be charges correct rates.

**Q6: What should be the termination charge for the calls originated from Internet Telephony Network and terminated into the Wireline and wireless Network?**

**Response:** Termination charges for call originated from Internet telephony Network and terminated into fixed network should be zero, but in case of mobile network, it should be charged on current rates only.

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Response :NA

**Q14:** Is there a need to prescribe QoS parameters for Internet telephony at present? If yes, what parameter has to be prescribed? Please give your suggestions with justifications.

KKS: Yes QoS parameters should be defined for Internet Telephony. The proposed parameters can be latency, throughput, codec allocation, interference etc

**Q15:** Any other issue related to the matter of Consultation.-

Response : NO