



To,
The Advisor (NSL),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
(Old Minto Road), New Delhi-02

No: Regln/1-32/2014/4048

Dated: 27 Apr, 2017

{Kind Attn: Shri. Sanjeev Banzal}

Sir,

Sub: - Comments on Consultation paper on "Introduction of UL (VNO) for Access Service authorization for category B license with districts of a State as a service area".

Kindly refer to your office press release dated 20th Mar, 2017 vide which a Consultation paper on "Introduction of UL (VNO) for Access Service authorization for category B license with districts of a State as a service area" was released for inputs/comments from the stakeholders.

In this context, kindly find herewith the BSNL comments on the above mentioned consultation paper:

Q1. Is there any need to introduce Cat -B VNOs in the sector?

- i. If yes, should the existing DID franchisees be mandated to migrate to UL (VNO) Cat-B based licensing regime? Do you foresee any challenges in the migration from franchisee regime to licensing regime?
- ii. If no, how DID franchisee can be accommodated in the existing licensing regime in the country?

BSNL Reply: Yes, based on the current requirements, it is suggested that the Cat-B VNOs may be introduced in the sector. It is also suggested that, it should not be mandated for migration of existing DID franchisees to UL VNO Cat-B based licensing regime. Both the options should be made available as per the requirement.

Q2. Based on the complexities discussed in Para 13-15 above, should the scope of UL (VNO) Cat-B licensee be limited to provide landline (voice) and internet services or should these be allowed to provide mobile service also?

In case mobile services for such licensees are allowed, how the issues enlisted in Para 13-15 will be addressed? Please explain in detail.

BSNL Reply: It is suggested to limit the scope of UL VNO Cat-B licensee for provisioning of landline (voice) and Internet services, without mobile services.

Q3. Can the license duration for UL (VNO) Cat-B be kept 10 years which is at par with other licenses issued under UL (VNO) policy? If no, justify your answer.

BSNL Reply: Yes, the license period for UL (VNO) may be kept as 10 years at par with other licensees.

Q4. What should be Networth, Equity, Entry Fee, PBG, FBG etc. for District level UL (VNO) Cat.-B licensee in case these are allowed for Wireline and Internet services only? Answer with justification.

BSNL Reply: Regarding Net worth, Equity, Entry fee - BSNL agreed with the figures shown in Table at 'A'. And, regarding PBG, FBG - BSNL agreed with para 2 (C) under the subject "Finance Conditions" of Consultation Paper.

Q5. What should be Networth, Equity, Entry Fee, PBG, FBG etc. in case Cat.-B VNOs are allowed to provide mobile access service also? Please quantify the same with justification.

BSNL Reply: Net worth, Equity, Entry Fee, PBG, FBG, Penalty etc. should be commensurate with the potential of business in the respective service area.

Q6. Keeping in view the volume of business done by DID franchisees, what penalty structure be prescribed for UL (VNO) Cat 'B' licensee for violation of UL (VNO) Cat.-'B' license terms and conditions?

BSNL Reply: It should be commensurate with the potential of business in the respective service area.

Q7. Should the UL (VNO) Cat.-B licensees be treated equivalent to the existing TSPs/VNOs for meeting obligations arising from Tariff orders/regulations /directions etc. issued by TRAI from time to time?

BSNL Reply: Yes.

Q8. What QoS parameters shall be prescribed for UL (VNO) Cat.'B' licensees?

BSNL Reply: The QoS parameters should be as per the TRAI guidelines for landline (voice) and Internet Services.

Q9. Based on the business and operational requirements as discussed in Para. 21 above, should UL (VNO) Cat. 'B' licensees be permitted to enter into agreement to hire telecom resources from more than one TSP in its area of operation for providing voice and internet services through wireline network?

BSNL Reply: No, as it may create complexity, like delay in bill payments etc. on part of VNOs if permitted to hire telecom resources from more than one TSP in its area of operation for providing landline (voice) and Internet services through wireline network.

Q10. Do you foresee any challenge in allowing such arrangement as discussed in Q9 above?

BSNL Reply: Same as Q.9.

Q11. Please give your comments on any related matter not covered in this Consultation paper.

BSNL Reply: DoT may be requested to extend the implementation of UL (VNO) guidelines till the time all the issues as pointed out in TRAI's consultation paper are addressed in totality and the existing DID franchisees of BSNL may be allowed to continue with the present arrangement as per the instructions contained vide DoT circular no. 4-5/93-PHB dated 27-01-1994 and 04-03-1994. The new DID franchisee, if any, may also be governed by the same instructions as above.

The Hon'ble Authority is requested to kindly consider the BSNL's comments on above mentioned Consultation paper.

Yours sincerely

27/4/17
Raghuvir Singh
AGM (RegIn-II)