



To,
Advisor (NSL)
Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan
Jawahar Lal Nehru Marg, (Minto Road)
New Delhi-110002

Kind Attention: Sh. Sanjeev Banzal, Advisor (NSL)

No: Regln/1-33/2014/ 4303 dated: 12-06-2017

Sir,
Sub:- BSNL's Comments on TRAI's Consultation Paper on "Network testing before Commercial launch of services"

Kindly refer to TRAI's Consultation Paper on "Network testing before Commercial launch of services" dated 01-05-2017. In this context, BSNL's comments are as follows.

Q1. Should a TSP be allowed to enrol subscribers as test users and in such case, should there be any restrictions on the number of test SIM cards and the period of such use? Please justify your response.

BSNL's reply: Yes, TSP should be allowed to enrol subscribers as test users and in such case, there should be restrictions on the number of SIM cards and also restrictions in period of such use.

Q2. To clearly differentiate test phase from commercial launch, which of the options discussed in Para 1.12 would be appropriate? Please provide justification. Please explain any other method that, you feel, would be more appropriate.

BSNL's reply: Para 1.12C would be appropriate

Q3. Do you agree that the provisions discussed in Para 1.13 viz. information to the subscribers about test SIM being temporary etc., should be put in place for the TSP testing its network involving test users/subscribers? Please suggest other provisions which should be mandated during test phase?

BSNL's reply: Yes. Further, no additional benefits be extended to test subscribers, in case such test subscribers continue to remain with TSP after commercial launch.

Q4. Is there a need to have a defined timeline for testing phase i.e. period beyond which a TSP should start offering commercial services? If yes, what should be the timeline? Please justify your response.

BSNL's reply: Yes. One month should be sufficient. With regulators permission it may be extended for another one month.

Q5. In case enrolling of subscribers as test users before commercial launch is allowed, whether subscriber related conditions and regulatory reporting requirements laid down in the license, be imposed for the test subscribers enrolled before commercial launch? Please provide justification to your response.

BSNL's reply: Yes, to avoid misuse of facility.

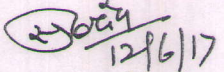
Q6. Should test users/subscribers of such licensees be given the facility of MNP? Please justify your answer.

BSNL's reply: No

Q7. If there are any other issues/suggestions relevant to the subject, stakeholders may submit the same, with proper explanation and justification?

BSNL's reply: Nil

Yours sincerely,


12/6/17
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