



RSM/COAI/2015/230

December 14, 2015

Shri Arvind Kumar
Advisor (NSL)

The Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi-110002

Dear Sir,

Sub: COAI Response to the TRAI Consultation Note on "IP Based Interconnection"

This is with reference to the TRAI Consultation Note on "IP Based Interconnection" issued on 27.11.2015.

In this regard, please find enclosed COAI's submission to the said consultation note as **Annexure - 1**.

We believe that our submission will merit your kind consideration.

Kind regards,

Sincerely yours,

Rajan S. Mathews
Director General



COAI Response to TRAI Consultation Note on IP Based Interconnection

1. At the outset, we would like to mention that TRAI last year on 30th June 2014 had issued a Consultation Paper on “Migration to IP based network”, vide which TRAI had discussed issues related to IP Interconnection, Co-existence of legacy network with IP based networks, Requirement of regulatory intervention in IP based interconnection, Interconnection requirement for application and content service, other operational issues.
2. COAI made a detailed submission on the Consultation Paper.
3. We would like to take this opportunity to reiterate following points from our earlier submission which we believe are relevant with respect to this Consultation Note:
 - a. A clear definition is required for the term IP Interconnection for proper clarity. IP interconnection should not be confused with Internet Interconnectivity and IP interconnection strictly would mean PLMN/PSTN to PLMN/PSTN voice / SMS traffic only and will not mean any data /packets through internet. It is reiterated that IP interconnection should not be mandated as this will entail huge costs - fresh investments and also wasted costs of existing investments, which is not justified.
 - b. The interconnection has been as per bilateral agreements among the TSPs, with dispute resolution and this practice should continue even at the advent of change in technology at the interconnecting point.
 - c. Voice is sold to customers on minutes basis and is likely to be sold so for many years to come. Therefore the IUC regime, which is primarily the revenue sharing regime for voice calls, has to be on the same basis and cannot be changed just because of any change of technology at the interconnecting points. Even in case of present IP Interconnection established by some operators from NGN Soft-switch / IP TAX, the charging is being done on Minutes basis using the voice CDRs generated by those switches and using the same interconnect billing system.

4. Proposed Amendment in Licence:

TRAI has proposed the incorporation of following provision, in Clause 27.3 of the U.L & similar clause in other relevant license,

“27.3.1 Interconnection between the IP based networks of different Licenses for carrying IP traffic shall be within the overall framework of the interconnection regulation/directions/ orders issued by TRAI/Licensor from time to time”.

COAI Submission:

- a. In this regard, we would like to submit that as per the existing License condition the licensees can interconnect their networks on both circuit switched and IP based protocol. The current License condition duly recognizes and provides for interconnection of PSTN/PLMN Services both on TDM and IP networks.



- b. Therefore, since the existing license conditions authorize the licensee to exercise its discretion to deploy TDM or IP interconnection, **we would like to submit that the amendment proposed in License vide the captioned consultation note is not required.**
 - c. **Thus, we request TRAI not to recommend to DoT for the insertion of the proposed provision in the UL & other similar licenses.**
5. Further, to the above we would like to make following submissions:
- a. COAI has always maintained that TDM and IP based networks should be allowed to co-exist and operators should have the flexibility to migrate /evolve to IP based networks based on their own commercial and business strategies. **Thus IP based interconnection should not be mandated.** In our response to previous consultation in June 2014 we have already elucidated the drawbacks of mandating IP Interconnection, which are not being repeated here and may be read as part and parcel of this response. However, in a scenario where both Parties mutually agree to interconnect on IP, they should be permitted to do so subject to overall compliance to other applicable licensing and regulatory requirements including but not limited to prevailing regulations on IUC, port charges, IN, RIO etc.
 - b. Also, any change in the licence condition cannot be carried out unilaterally. Both Licensor and Licensee have to agree to the proposed changes in the license condition before it is incorporated.
