To,   Date: 31st July 2024
Shri Akhilesh Kumar Trivedi,
Advisor (Networks, Spectrum and Licensing),
Telecom Regulatory Authority of India

From
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Dear Sir,

Let's begin by introducing ourselves. Veeno Communications Pvt Ltd is fully owned subsidiary of Exotel Techcom Pvt Ltd. Veeno holds national area Access Service , NLD and ISP License.

 Exotel Techcom Pvt Ltd took Audio conferencing license for seven service areas over ten years ago. It has applied for the National Area Audio Conferencing License and application is under processing with DoT.

We are happy to provide our responses to the consultation paper as mentioned above and will be happy to provide any further information / details as may be required.

To begin with, our generalised observation is that TRAI and DoT do not include UL-VNOs in certain regulations which impact UL-VNOs . As examples, we can cite End user KYC for Enterprises, 160 numbering series regulations and CNAP. It is our request that when such regulations are being made, impact on UL-VNOs should also be considered and appropriately included.

Please find our responses to specific queries.

Q5. In addition to the service-specific authorisations at service area level, whether there is a need for introducing a unified service authorisation at National level for the provision of end-to-end telecommunication services with pan-India service area under the Telecommunications Act, 2023? Kindly justify your response.

Response: We request Unified service authorization at National level (As compared to extant licensing at telecom circle level). We believe current structure of Telcom circle wise authorization is helpful for
> **1. Very large players**
> **2. Very small players spread over 1 or 2 Telcom circles / SDCA.**
This leaves out mid segment – Who wish to have national level service however handle niche areas. Needing them to interact with 20+ Telecom circles.

Q6.   In case it is decided to introduce a unified service authorisation at National level for the provision of end-to-end telecommunication services-

(a)   What should be the scope of service under such an authorisation?
(b)   What terms and conditions (technical, operational, security related, etc.) should be made applicable to such an authorisation?
(c)   Would there be a need to retain some of the conditions or obligations to be fulfilled at the telecom circle/ Metro area level for such an authorisation?
(d)   Should assignment of terrestrial access and backhaul spectrum be continued at the telecom circle/ Metro area level for such an authorisation?

(e)   Any other suggestion to protect the interest of other authorised entities/ smaller players upon the introduction of such an authorisation.
Kindly provide a detailed response with justification.

Response: Presently even for national area service licenses for Access Services , AGR computation is done on circle basis. This leads to complications and delays in AGR filings and license fee payments. We recommend for PAN India operators of Access Services, the revenue share, ApGR / AGR calculation etc may be done at as a national entity on overall revenues and not on circle basis. This will help specifically the mid-segment of operators to expand services with ease and enhance the ease of doing business.

Q7. Within the scope of Internet Service authorisation under the Telecommunications Act, 2023, whether there is a need for including the provision of leased circuits/ Virtual Private Networks within its service area? Kindly provide a detailed response with justifications.

Response: We recommend inclusion of the leased circuit / Virtual private network as part of the scope.

Q19. In view of the provisions of the Telecommunications Act, 2023 and technological/ market developments, -
(a)   What changes (additions, deletions, and modifications) are required to be incorporated in the respective scopes of service for each service authorisation with respect to the corresponding authorizations under the extant Unified License for VNO?
(b)   What changes (additions, deletions, and modifications) are required to be incorporated in the terms and conditions (General, Technical, Operational, Security, etc.) associated with each service authorisation with respect to the corresponding authorizations under the extant Unified License for VNO?
Kindly provide a detailed response with justifications.

Response:
1. **Internet Telephony should be allowed with Wireline access service numbers as well with ability to serve customers within India. Currently it is allowed with Mobile access numbers only.**
2. **It should be clarified that UL/UL(VNO) are allowed to carry IP telephony voice over internet and deliver to the customer location anywhere in India in their authorised service areas, irrespective of point of interconnect with their host NSOs.**
3. **It should be clarified that UL/UL-VNO regulations over ride OSP guidelines in matter of call flow .**

Conditions should include
1. **Internet telephony is allowed only if service is provided by UL/UL(VNO) to ensure both telephony part and internet part of the security it taken care by the operator. This essentially should discourage those without any license to provide IP telephony service.**

Justification
1. **With Pan India tariffs, zero IUC and no domestic roaming charges, there is no toll bypass in internet telephony.**
2. **With advancement of technology and IUC guidelines, there is not much of difference between routing of calls across all operators. In fact, it may help to**

optimise and provide better service, if the POI within a telecom circle is clubbed for both mobility, wireline and IP telephony services.

3. The OSP's are already allowed to carry inbound calls from one OSP centre to other OSP centre using any technology other than internet – As the service is being provided by UL/UL(VNO) who have authorization for both access and internet service, it should be allowed.

Q20. Whether the Access Service VNOs should be permitted to parent with multiple NSOs holding Access Service authorisation for providing wireless access service? If yes, what conditions should be included in the authorisation framework to mitigate any possible adverse outcomes of such a provision? Kindly provide a detailed response with justifications.

Response: Access Service VNOs should be permitted have agreement and parent with multiple NSOs for both wireline access service and Mobility access service.

Conditions should include
    1. VNOs are not allowed to interconnecting different NSOs .
    2. Common equipment (EPABX / IPPBX) is allowed for both wireline access services and mobile access services. However, VNOs are responsible to ensure NSOs are not interconnected in all scenarios with use of different IPPBX or logical partition.

Justification.
    1. With technology evolution, customers expect the service delivery operators (VNO) to be able to provide uniform experience, very high availability across multiple NSOs
    2. Limiting the VNOs to one NSOs reduces the possibility of being able to extend better quality, cost and overall services to the end customer
    3. Please note that some NSOs may have superior technology or expertise in say wireline access service but not Mobility access services
    4. Please note that some NSOs may have superior technology with reference to ILD services however may lack presence in Mobility etc.
    5. Mandating VNOs to work with only one NSO will disable VNOs to offer / meet market requirement if the NSO does not support or acts in a manner detrimental to VNOs
    6. Providing level playing field for all VNOs and NSOs to offer niche and differentiated services.
    7. Considering the current market practice of pricing – All most all NSOs have adopted unlimited calling and concept of local, STD calls have gradually lost importance
    8. As the IUC costs are also abolished, this will provide an environment of continuous innovation and the performing NSOs and VNOs will enable better digitization assisting overall interest of the nation.

Q21. Considering that there are certain overlaps in the set of services under various authorisations, would it be appropriate to permit service-specific parenting of VNOs with Network Service Operators (NSOs) in place of the extant authorisation-specific parenting? Kindly provide a detailed response with justifications.

Response: VNOs should be permitted parent with multiple NSOs for every service authorization like Wireline access service, Mobile access service, Internet access service including parenting to Class A ISP for services like Internet access service.

Conditions should include
    1. VNOs are not allowed to work as local exchanges either for voice, internet between NSOs or parenting partners.
    2. Common equipment is allowed. However, VNOs are responsible to ensure NSOs / Parenting networks are not interconnected by use of logical partitioning, routing in case of internet etc.

Justification.

1. It may be noted that NSOs may have differences in the way they design networks, onboarding process, ease of use and other parameters related to quality and cost. Allowing multiple NSOs will provide better chance to VNOs to serve the end customers.

2. Most VNOs address niche markets enabling better innovation. There by customer demand high availability, Multiple redundancies etc as part of the standard requirements.

3. Limiting the number of NSO either service specific or authorization specific will make the VNOs success purely dependent to on the performances of the particular NSOs there by making it more difficult for the VNOs to operate.

Q42. What should be the amount of application processing fees for the various service authorisations including VNOs, other than the merged/clubbed/new service authorisations? Please provide your response for each of the service authorisation separately.

Response: Application fee for the various authorization can be same as current application fee.

Q43. Whether the amount of entry fee and provisions for bank guarantee for various service authorisations including VNOs, other than the merged/clubbed/new service authorisations, should be:

i.   kept the same as existing for the various service authorisations under the UL/UL(VNO) license

ii.   kept the same as recommended by the Authority for the various service authorisations under the UL/UL(VNO) license, vide its Recommendations dated 19.09.2023

iii.   or some other provisions may be made for the purpose of Entry Fee and Bank Guarantees

Please support your response with proper justification separately for each authorisation.

Response: We recommend to Keep the same as recommended by the authority for the various services authorization under the UL/UL(VNO) license vide its recommendations date 19.09.2023

Q44. Whether there is a need to review any of the other financial conditions for the various service authorisations including VNOs, other than the merged/clubbed/new service authorisations? Please provide your response for each service authorisation separately with detailed justification.

Response: For PAN India operators, One BG can be taken at national level instead of circle wise BG simplifying the operational overload.

Thanking you