The Secretary,   02.06.2019

Telecom Regulatory Authority of India,

New Delhi

Kind attention to: **Shri U. K. Srivastava, Principal Advisor (NSL)**

Sir,

Sub: forward our counter comment on Consultation Paper on Review of terms and condition for registration of other service providers (OSPs)

We respectfully submit our counter comment in the above subject:

Q1. Please provide your views on the definition of the Application Service in context of OSP. Whether, the Application Services which are purely based on data/ internet should be covered under Application Service for the purpose of defining OSP.

Ans. Yes. Application Services purely based on data/internet should be covered for defining OSP.

Q2. Whether registration of OSP should be continued or any other regulatory framework should be adopted for OSPs so that the purpose of registration specified by government is met. Please furnish your views with justification.

Ans. Registration of OSP should be continued with the norms of Govt. adhered to.
The customers shouldn't suffer due to the slackness of the OSPs

Q3. What should be the period of validity of OSP registration?Further, what should be validity period for the renewal of OSP registration?

Ans: The present practice may continue.. In addition to that the period of validity of OSPs should have a clause basing the performance and customers' satisfaction.

Q4. Do you agree that the documents listed above are adequate to meet the information requirements for OSP registration? If not, please state the documents which should be added or removed along with justification for the same.

Ans. The value of the Bank guarantee seems very high and it has to be reduced enable to register efficient and ordinary people. If the registering person seems as technocrat or self employed , the bank guarantee may be exempted

Q5: Do you agree with the fee of Rs. 1000/- for registration of each OSP center. If not, please suggest suitable fee with justification.

Ans: It will sufficient..

Q6: Do you agree with the existing procedure of OSP registration for single/ multiple OSP centers? If not, please suggest suitable changes with justification.

Ans. Multiple centers for OSP should be restricted. Particular OSP may benefit due to nepotism and political clout.

Q7: Do you agree with the existing provisions of determination of dormant OSPs and cancellation of their registration? If not, please suggest suitable changes with justification.

Ans. Agree with determining dormant OSPs and cancellation of their registration

Q8. Do you agree with the terms and conditions related to network diagram and network resources in the OSP guidelines? If not, please suggest suitable changes with justification.

Ans. OSP is permitted to have internet connectivity from the authorized Internet Service Provider. For the purpose of Internet connectivity in India, the OSPs are permitted to use IP address that is registered in the name of an Indian Entity that shall be traceable to a physical address (location) in India. Internet connectivity and IP addresses pertaining to any location outside India is not permitted.

Internet connection for each OSP centre separately, as per requirement.

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Q9. Do you agree with the provisions of internet connectivity to OSP mentioned in the OSP guidelines? If not, please suggest suitable changes with justification.

Ans. Yes, we agree with the provisions of internet connectivity to OSP

Q10. Do you agree with the provisions related to Hot Sites for disaster management mentioned in the OSP guidelines? If not, please suggest suitable changes with justification.

Ans. We agree with the provisions elated to Hot Sites for disaster management.

Q11. Do you agree with the provisions of logical separation of PSTN and PLMN network resources with that of leased line/ VPN resources for domestic OSP mentioned in the OSP guidelines? If not, please suggest suitable changes with justification.

Ans. We agree with the provisions of logical separation of PSTN and PLMN network resources.

Q12. Do you agree with the provisions of PSTN connectivity/ interconnection of International OSP mentioned in the OSP guidelines? If not, please suggest suitable changes with justification.

Ans. We agree with the provisions of PSTN connectivity/interconnection of Inter

Q13. Please provide your views as to how the compliance of terms and conditions may be ensured including security compliance in case the OSP centre and other resources (data centre, PABX, telecom resources) of OSP are at different locations.

Ans. Check on OSP centres should be maintained constantly, where their resources are at different locations. The ingoing and outgoing calls should be monitored as well as the Hertz frequency of different nature to be barred.

Q14. Please provide your views whether extended OSP of existing registered OSP may be allowed without any additional telecom resource. If yes, then what should be the geographical limitation for the extended OSP centre; same building/ same campus/ same city?

Ans .Extended OSP of existing registered OSP may be allowed within the same city, since administrative bodies will be the same, felicitating easier monitoring.

Q15. Please provide your views as to how the compliance of terms and conditions may be ensured including security compliance in case of the extended OSP centre.

Ans. Security concerns can be ensured by putting clauses as to not to outsource or sublet or share the OSP centre's operations.

Q16. Do you agree with the provisions of general conditions for sharing of infrastructure between International OSP and Domestic OSP mentioned in the OSP guidelines? If not, please suggest suitable changes with justification.

Ans. No. Sharing of infrastructure between International OSP and Domestic OSP should not be encouraged due to leakage of data and information .The International OSP's equipments can be hired with hacker proof devices, to ensure secrecy.

Q17. Do you agree with the provisions of Technical Conditions under option -1 & 2 for sharing of infrastructure between International OSP and Domestic OSP mentioned in the OSP guidelines? If not, please suggest suitable changes with justification.

Ans. Yes. Sharing with logical partitioning is agreeable

Q18. In case of distributed network of OSP, please comment about the geographical limit i.e. city, LSA, country, if any, should be imposed. In case, no geographical limit is imposed, the provisions required to be ensure compliance of security conditions and avoid infringement to scope of authorized TSPs.

Ans. Geographical limit of city would suffice.

Q19. Do you agree with the provisions including of logical partitioning mentioned in the OSP guidelines for distributed architecture of EPABX? If not, please suggest suitable changes with justification.

Ans. Yes. Logical partitioning mentioned in the OSP guidelines is agreeable.

Q20. Do you agree with the monitoring provisions of mentioned in the OSP guidelines for distributed architecture of EPABX? If not, please suggest suitable changes with justification.

Ans. We agree with the monitoring provisions.

Q21. Please comment on the scope of services under CCSP/HCCSP, checks required / conditions imposed on the CCSP/ HCCSP including regulating under any license/ registration so that the full potential of the technology available could be exploited for both domestic and international OSP, and there is no infringement of the scope of services of authorized TSPs.

Ans. The voice calls and other calls should be simultaneously metered both at the OSPs and

Q22. Please provide your comments on monitoring of compliance in case interconnection of data and voice path is allowed for domestic operations.

Ans: Apart from the present system some of the outsiders may engage to monitoring.

Q23. Do you agree with the provisions for use of CUG for internal communications of OSP as mentioned in the OSP guidelines? If not, please suggest suitable changes with justification.

Ans. Yes, we agree for the use of CUG for internal communications of OSP, as mentioned in the OSP guidelines.

Q24. Do you agree with the monitoring provisions for use of CUG for internal communications of OSP mentioned in the OSP guidelines? If not, please suggest suitable changes with justification.
Ans. Yes. We agree with the monitoring provisions for use of CUG.

Q25. Do you agree with the provisions of 'Work from Home' mentioned in the OSP guidelines? If not, please suggest suitable changes with justification.

Ans. We agree with the provisions of .Work from Home' mentioned in the OSP guidelines.

Q26. Whether domestic operations by International OSPs for serving their customers in India may be allowed? If yes, please suggest suitable terms and conditions to ensure that the scope of authorized TSP is not infringed and security requirements are met.
Ans. No .Country's security will be considered.

Q27. Whether use of EPABX at foreign location in case of International OSPs may be allowed? If yes, please suggest suitable terms and conditions to ensure that the scope of authorized TSP is not infringed and security requirements are met.

Ans. Foreign EPABX may be allowed after addressing the prevention of tapping the calls is ensured.

Q28. Do you agree with the Security Conditions mentioned in the Chapter V of the OSP guidelines? If not, please suggest suitablechanges with justification.

Ans. Yes, we agree with the Security conditions mentioned in the Chapter V of the OSP guidelines.

Q29. Do you agree with the provisions of penalty mentioned in the OSP guidelines? If not, please suggest suitable changes with justification.

Ans. Yes. We agree with the provisions of penalty mentioned in the OSP guidelines.

Q30. Whether OSP to OSP interconnectivity (not belonging to same company/ LLP/ group of companies) providing similar services should be allowed? If yes, should it be allowed between domestic OSPs only or between international and domestic OSPs also.

Ans. Interconnectivity between international and domestic OSPs may be tried on a trial basis.

Q31. In case OSP interconnectivity is allowed, what safeguards should be provisioned to prevent infringement upon the scope of licensed TSPs.

Ans. Electronic watch dogs should be installed to prevent any infringement of official secrets

Q32. Do you agree with the miscellaneous provisions mentioned in the Chapter VI of the OSP guidelines? If not, please suggest suitable changes with justification.

Ans. Yes. We agree with the miscellaneous provisions mentioned in the Chapter VI of the OSP guidelines.

Q33. What provisions in the terms and conditions of OSP registration may be made to ensure OSPs to adhere to the provisions of the TCCCPR, 2018.

Ans. Electronic governing of unregistered UCCs must be done to ensure OSPs to adhere to the provisions of TCCCPR.

Q34. Stakeholders may also provide their comments on any other issue relevant to the present consultation.

Ans: No further comments..
Yours Sincerely
M. Sekaran,
President
CAG with TRAI