



**Q1. In view of the discussion in Para 2.13, is it necessary to have a separate standalone licence for Voice Mail Service? If so, why? Please provide detailed justification?**

**RESPONSE:**

We believe there is sufficient scope of co-existence of standalone licence and other full time license to provide these service under their licenses. An Audiotex/Voicemail service should continue to be treated as Content service and facilitating license be available for small time player and new operators to co-exist. It would also be good to change the nomenclature from Audiotex to Audio conferencing, Audiotex is no longer a service that is offered by operators. there is a requirement to appropriately rename this license to include the word "Audio conferencing /Multi-party conferencing", this will surely bring more clarity and avoid any misperception, if any. To elaborate, TEC in its service requirement No SR/ATS-01/02 May 2003 (which supersedes Sep' 1994 SR) for Audiotex service dated May 2003 has clearly captured the scope of the Audiotex license which includes multiparty conferencing i.e. enabling two or more callers to speak to each other, as one of the prime service to be provided by the Audiotex licensee.

There are many players like Permier Global Service, Free Conference, Intercall, Arkadin who are predominantly in the space of providing seamless audio and video conferencing facility across the globe.

Audiotex/voicemail service should be treated like "**Other Service Providers**" (OSP) who are dependent on the telecom resources from Access service provider to reach out to their customers and can not provide telecom resource on their own. Provision of Voice Mail / Audio Conference / Audio Tex / Unified Messaging Service should be under a specific registration / authorisation as done for OSPs currently.

Such entities cannot be compared to a telecom licensee/operator who have the right to create infrastructure and provide telecom service under their single license. The existing license for Voice Mail / Audio Conference / Audio Tex / Unified Messaging only permits creation of infrastructure. Provision of telecom service there is a dependency on existing telecom operators to provide the connectivity. Unless the connectivity is sourced, the infrastructure created is not

of much significance as it is unable to provide any service to the customer. This is similar to the OSP registration where the OSPs are required to source telecom connectivity from authorised telecom service provider.

Audio conferencing services now encompass both traditional TDM and VOIP network architecture. Furthermore, with the proliferation of personal smart devices (e.g., Smart phones, tablets, Smart TV, etc), audio conferencing can be conducted over a wide variety of devices and geographical boundaries. Corporate users, in particular, very often require global and ubiquitous access across national boundaries. It is therefore important that TRAI does not impose any technological (TDM or IP) restriction on how audio conferencing service is implemented in India nor how the service is interconnected with similar services worldwide.

**Q2. If the answer to the Q1 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?**

**RESPONSE:**

Yes, there is a need to review the existing technical specification in view of the fact that the license was written many years back and the technology advancement have happened many fold since. The world over things have moved from traditional PSTN based calling to now VOIP or rather Everything on IP (EOIP). The horizon of audio conferencing is no longer domestic but predominantly global and accordingly there is a need for necessary amendment in the Audiotex license. Thus, there is a need to make changes in the existing Audiotex License to allow technological advancement especially in IP conferencing, Telepresence, Webex etc.

It is important that suitable change be done in the current Audiotex license to allow both the IP and PSTN callers to connect to the same bridge and have the multiparty conferencing with the convergence of these IP – PSTN between people in India and abroad to enable affordable solution and India be able to offer the latest solution available in the world. Regulation should not be acting as a deterrent in allowing technology advancement from being offered to people of the country on the garb of protection of traditional voice solution. The eco-system is fast evolving and there is a paradigm shift in service offerings by the operator and the line between PSTN & IP disappearing. Its only a matter of time that all operators will move today's data only

offerings. **In fact convergence and efficient delivery are essential for the survival of the service providers.** All communications services will need to be converged very soon to offer voice, text, video, and pictures via a single platform. This will also assist the threat posed by OTT players to large extent, while addressing the security concern with OTT service.

The National Telecom Policy 2012, under Point 6 of the Preamble, “Objectives and Strategies” duly recognized the need for convergence of technologies, services, networks and platforms . Convergence will enable advancement and open IP platform which will enhance the end-user experience. IP-PSTN interconnection would lead to interconnection of IP and TDM networks. Envisaging this technology advancement, there are already provision for PSIT to IP interconnect and recently even IP to IP interconnect was duly amended by DOT.

Over the years the concept of conferencing has evolved. Today the technology has changed the basic paradigm of how conference is being done. There are numerous conferencing products available in the market which provides a seamless service while providing multiple features. Thus, there is a need for our regulation to support technology advancement which encourages emerging technologies for a seamless conferencing experience. The users of conferencing service are primarily enterprise customers who need to communicate globally using the underlying telecom resources sourced from authorised telecom operators. Therefore the regulations should encourage simplicity and permit all kinds of calls/traffic to be converged on the conferencing platform. Today with the help of a smart phone a user is able to conference multiple parties and is no more dependent on DTFS or ITFS number or a specific provider to for the conferencing requirements. Therefore the regulation should take note of these developments and the emerging technologies and services and then take a decision in a manner that promotes conferencing.

**we also submit that the service area scope of the Audiotex license should be increased from SDCA to Circle level** and all artificial barriers be removed and allow IP-PSTN connectivity at the bridge.

**Q3. In view of Para 2.17 and present technological developments, is it necessary to have a separate standalone licence for only Audiotex Service? If so, why? Please provide detailed justification?**



**RESPONSE:**

Already responded in Q1. We believe there is sufficient scope of co-existence of standalone licence and other full time license to provide these service under their licenses.

**Q4. If the answer to the Q3 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?**

**RESPONSE:**

Yes, response given in Q2.

**Q5. Whether there is a need for standalone licence for providing Audio Conferencing Service? If yes, whether the technical specifications need to be explicitly defined? Please provide detailed justification?**

**RESPONSE:**

Already responded in Q 1.

**Q6. If the answer to the Q5 is in the affirmative, what should be the technical specifications for providing Audio Conferencing Service?**

**RESPONSE:**

already covered in our response to Q2.

**Q7. Is it necessary to have a separate licence for Unified Messaging Service when holding an ISP licence is mandatory to provide the Unified Messaging Service and standalone ISP licensee is also allowed to provide Unified Messaging Service? If so, why? Please provide detailed justification?**



**RESPONSE:**

Already responded above

**Q8. If the answer to the Q7 is in the affirmative, whether the existing technical specifications need to be revised or redefined? What should be the revised technical specifications?**

**RESPONSE:**

Not required

**Q9. In case Voice Mail/Audiotex/Unified Messaging Service requires a licence should they be made a part of the Unified Licence as one of the services requiring authorisation? Please provide detailed justification?**

**RESPONSE:**

As per answers to Q1

**Q10. If the answer to the Q9 is in the affirmative, what should be Service Area? Whether Service Area may be similar to the Service Area of ISP (National Area, Telecom Circle/Metro Area, Secondary Switching Area) to bring in uniformity among the Service Areas of different services? Please provide detailed justification?**

**RESPONSE:**

In view of our recommendation of broadening the scope from pure PSTN to also include IP based platform, it is thus, recommended that the license be issued on all India bases or at least on per circle basis. With the concept of ONE INDIA , there is a need to remove these barriers related to circles, specially going forward when everything will move to IP.

**Q11. If Voice Mail/Audiotex/Unified Messaging Services is made a part of the Unified Licence as one of the services requiring authorisation then what should be the Entry Fee?**

**RESPONSE:**

Since we are equating this to that of an OSP, thus minimum entry fees should be kept for standalone service provider. The current fees may be continued.

**Q12. Whether there should be any requirement for Minimum Net worth and Minimum Equity for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?**

**RESPONSE:**

The Minimum Net worth & Minimum equity may be equal to ISP license so that only serious players enter the market.

**Q13. The annual licence fee for all the services under UL as well as for existing UASL/ CMTS/ Basic Service/ NLD/ ILD/ ISP licensees have been uniformly fixed at 8% of AGR since 1st April 2013. Whether it should be made same for Voice Mail/ Audiotex/ Unified Messaging Services authorisation under Unified Licence? If not, why?**

**RESPONSE:**

in view of level playing field, it is suggested that the revenue earned by Audiotex be treated similarly to all other license. However, they be allowed to reduce the interconnection charge paid to other license holder while calculating AGR.

**Q14. In case the answer to the Q13 is in the affirmative then what should be the definition of AGR for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?**

**RESPONSE:**



**Business  
Services**

already responded in Q13.

**Q15. What should be the Performance Bank Guarantee, Financial Bank Guarantee and Application Processing Fee for Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?**

**RESPONSE:**

As mentioned earlier, there should be minimum Entry Fee Only Performance Bank Guarantee of 3 lacs may be taken for ensuring compliance to the requisite license conditions.

No separate Financial Bank Guarantee and Application Processing Fee is however envisaged. However, if the Authority decides to cover Audiotex also under the license fees umbrella, then FBG may be equal to two quarters License Fees.

**Q16. Whether the duration of the licence with Voice Mail/Audiotex/Unified Messaging Services authorisation be made 20 years as in the other licence authorisations under Unified Licence? If not, why?**

**RESPONSE:**

Yes, duration of the license Voice Mail/Audiotex/Unified Messaging Services authorisation may be made 20 years (perhaps with a codicil that in the case of emergent new technologies within this time span the license may be reviewed to ensure incorporation of latest technologies with maximum benefit to all stakeholders.)

However, for existing licensees whose duration of license is for a period of 15 years, the same should be closed upon completion of the scheduled period.

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**Q17. What should be the terms and conditions for the migration of the existing Voice Mail/Audiotex/Unified Messaging Services licensees to Unified Licence?**

**RESPONSE:**

We feel that the existing licensees should be allowed to complete their licensing tenure of 20 years ( 15 years plus 5 year extension) and there should not be any forceful migration to the UL . It may kindly be noted that any mandatory/forceful migration of existing licensee is against their legal rights of completing full tenure of the license agreement.

Authority may also note that in the recent UASL/CMTS to UL migration, DOT has allowed licensees to complete their full tenure of 20years before issuing new UL to them. The same policy decision should be applicable in this case and the existing Audiotex licensees should be allowed to complete their 20 years tenure before shifting to UL

**Q18. Whether the existing Voice Mail/ Audiotex/ Unified Messaging Services licensees may be allowed to continue or it would be mandatory to migrate to the Voice Mail/ Audiotex/ Unified Messaging Services authorisation under Unified Licence?**

**RESPONSE:**

DOT has never mandated migration to new license in past and the same system should be continued. Basic Service to UASL and UASL to UL are fine examples. DOT can however, encourage to migration by having more favorable provision under UL.

**Q19. What should be the annual licence fee for existing Voice Mail/Audiotex/Unified Messaging Services licensees who do not migrate to the Voice Mail/Audiotex/Unified Messaging Services authorisation under Unified Licence?**

**RESPONSE:**



Under the principles of equality, same service should be subjected to same rules. For those who opt to migrate to the Service authorisation under Unified License and those who don't, the license fees and entry fees should be the same.

Applicable uniform rate of License fee should now be taken as 6% of AGR on par with that of other telecom services being provided by UL licensee with authorisation for Voice Mail/ Audiotex/ Unified Message Service

**Q20. Please give your comments on any related matter, not covered**

**RESPONSE:**

No comments