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	Inputs from Ozonetel Communications Pvt. Ltd, to Consultation Paper No. 21/2019	
	TRAI Pre- Consultation Paper (CP) on Enabling Unbundling of Different Layers Through Differential Licensing	

Q1	In your view, what could be the possible benefits and anticipated problems in having an unbundled licensing regime? Kindly suggest the measures that can be taken to overcome the anticipated problems (if any).	The current regulatory framework on licensing is heavily leaning on controlling every single end use of the services delivered on the underlying network infrastructure. This has given rise to acute hardship for any innovative use and optimal exploitation infra thereby resulting in heavy underutilized infrastructure and dead capital in the form of avoidable wastage of expensive resources.
		
		Hence it is an immediate and dire need to evolve a regulatory framework that enables:
		
		✓ Unbundling of the licensing regime that can foster
		   o Efficient utilization of the network infrastructure already available and lying waste and that can be effectively exploited and used.
		   o Promotion of Niche application services to be developed and provided by such new breed of service providers who can just subscribe the access resources without any regulatory overheads whatsoever.
		   o Building captive / shared application services by the bulk users/ aggregators without the need for any regulatory overheads.
		The only problems that may be anticipated are with respect to the Identification of the subscribers and traceability and accountability, which can be addressed by mandating:
		✓ Same KYC norms for every subscriber of any application services provided by the Application Services Providers.
		✓ Audit trails for every application service that is provisioned which can provide evidence for any law enforcement machinery.

Q2	In case it is decided to unbundle the different layers of licensing,	
	(a) What should be the different layers and their scope? What changes would be required in licensing regime to enable such a framework?	We can successfully adopt the Singapore model and make it simple. Only two layers exist then: 1. Facilities based operations 2. Services based operations.
	(b) Should there be a new regime of licensing on which the existing licensees should migrate within a specified time	As the facilities refer to the entire underlying network infrastructure built for rendering all the telecom services/ application service that ride over the same, all the existing UL licensees can migrate to this framework, without the need for any new parallel incentivization.

	frame or there should be a parallel incentivized licensing regime for unbundled layers of license?	All the OSP/UL-VNO/Audiotex etc. kind of services may be migrated to a single Services based operations regulatory framework with light touch regulation without compromising on any security/ KYC/ Audit trail requirements.
Q3	In case you are of the opinion that there is no need of unbundling of different layers of the license, what changes should be made in the existing licensing regime to (i) promote sharing to increase utilization of the existing resources, and (ii) catalyze investments and innovation in Digital Communications sector?	We strongly opine that there is a need for unbundling the different layers of licensing, so that respective licensees can focus on exclusively developing and deploying the new and innovative services without getting bogged down by the regulatory requirements that are specific to each of these layers. As long as the same old outlived regulatory framework gets tweaked and force fitted to the emerging areas of operations, the same does not serve the purposes it is intending to serve.
Q4	What other reforms / changes are required in the existing licensing regime?	There is a need to separate the Access Services Directory Numbers, IN Numbers, TFNS and UANs, to the underlying service provider. With the pre-bundling these Directory Numbers with the underlying services, we created a new regulatory framework for Number portability. If the total DN range available in the country is brought under a new National Number Assignment Authority (NNAA) and the DNs are assigned only when any subscriber buys the same and then choses to attach the same to the Telco/ Facilities based operator, then there is no artificial and /or imposed number stickiness that comes along with the same, where in the Facilities based operator can only be changed through MNP etc. MNP itself becomes irrelevant once the DNs no longer become the property of the Access Services providers. Users Subscribe for the TFN/UAN/MDN / DN range from the NNAA and then port the same to PRI/SIP trunks they buy from the Telco's. This can ensure there are no locked up and un-used number inventory lying with existing subscribers who get a set of DNs bundled along with PRI/SIP and there is scarcity at other end who want the DN range but do not get the same as these are scarce and finite resources. Once we have this NNAA kind of arrangement, we don't need any portability regime and also Stickiness of Numbers to any Telco's etc.,