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## **Comments: Consultation Note on IP Based Interconnection**

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1. Sistema Shyam Teleservices Ltd (SSTL) welcomes opportunity extended by TRAI to comment on the consultation note on IP based Interconnection.
2. Encouraging the ubiquitous deployment of Next Generation Broadband infrastructure is one of the main objectives of the National Telecom Policy and achieving that goal would largely depend on completing the transition to all IP networks and an essential component of which will be “IP-to-IP interconnection”.
3. IP networks are far more versatile and efficient than the TDM-based PSTN. IP-to-IP interconnection is an essential element in completing the transition from TDM to IP networks and services. The IP to IP interconnection would boost VoIP and broadband deployment.
4. The relevant national/international standards should be followed for IP-to-IP interconnection with Packet Switched network of different service providers.
5. The IP-to-IP interconnection should be allowed only between licensed service providers.
6. In case of IP-to-IP interconnection, the unified Licensee should be allowed to use single media gateway catering to multiple service areas as long as it complies with the designated point of handover of various calls as per the architecture mandated and revised by TRAI/DoT from time to time. The present architecture for interconnection is totally outdated and needs to be reviewed in the context of IP-to-IP interconnection.
7. The Indian Telecom market has matured and traffic is fairly distributed amongst the existing service providers. In this context TRAI to ensure that the prevailing Interconnection Charges like setup charges, port charges etc. are done away with.
8. Our specific comment on the proposed amendment by incorporating the necessary provisions in the Clause 27.3 of the Unified License to facilitate IP



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based interconnection between service providers raised in the Consultation Note is as below:

Clause (UL) 27.3	Existing	Proposed Text
	<p>Interconnection between the networks of different Licensees for carrying circuit switched traffic shall be as per national standards of CCS No.7 as amended from time to time by Telecom Engineering Centre (TEC) and also subject to technical feasibility and technical integrity of the Networks and shall be within the overall framework of interconnection regulations /directions / orders issued by the TRAI/ Licensor from time to time. For inter-networking between circuit switched and IP based network, the Licensee shall install Media Gateway Switch. Further, the Licensor may direct the LICENSEE to adopt any other technical standards issued by TEC on interconnection related issues.</p>	<p>Interconnection between the networks of different Licensees for carrying circuit switched traffic shall be as per national standards of CCS No.7 as amended from time to time by Telecom Engineering Centre (TEC) and also subject to technical feasibility and technical integrity of the Networks and shall be within the overall framework of interconnection regulations/ directions/ orders issued by the TRAI/ Licensor from time to time. For inter-networking between circuit switched and IP based network, the Licensee shall install Media Gateway Switch. Further, the Licensor may direct the LICENSEE to adopt any other technical standards issued by TEC on interconnection related issues.</p> <p>27.3.1 Interconnection between the IP based networks of different licenses for carrying IP traffic shall be <b>based on mutual agreement of the Interconnecting parties and</b> within the overall framework of the interconnection regulation/directions/ orders issued by TRAI/Licensor from time to time.</p>

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