

Solutions Infini Counter Comments on the TRAI Consultation Paper No.12/2016 Consultation Paper on Review of Voice Mail/Audiotex/Unified Messaging Services.

Introduction

We extend our gratitude to TRAI for allowing us to share our viewpoints on the “Review of Voice Mail /Audiotex /Unified Messaging Services Licence”. We are presenting some counter comments on the points specified by some organizations with descriptive reasoning and point of view.

1. Views specified by COAI in the comments:

“The decision on licensing aspect of the Voice Mail /Audiotex /Unified Messaging Services was the need of the hour considering the recent incidences wherein certain new calling Apps and also some of the existing Voice Mail /Audiotex /Unified Messaging Services licensees are violating the Indian Telegraph Act and offering services without a license or are violating some of the key terms & conditions of the Voice Mail /Audiotex /Unified Messaging Services licence”

Solutions Infini’s Viewpoint:

We need to understand that the services mentioned above are “application services” in nature and therefore should not require any further licensing. The services under no circumstances come under “Telecom carrier services” and therefore should not be subject to further licensing.

2. Acquiring /servicing customers outside the Licensed

Solutions Infini’s Viewpoint:

We believe that the purpose of this consultation paper is diversify the views on the rational norms and modify it in the benefit of mutual interests.

3. Security Risk: Since the CDRs generated capture all such calls as Mobile Terminating (MT) calls from person ‘C’ (i.e. App), while the communication practically happened between person A and person B, hence it will not be possible to link these two calls together on the basis of generated CDRs to conclusively.

Solutions Infini’s Viewpoint:

The basic conjugation of these services is embedded with proper tracking mechanism where proper CDRs are maintained at all instances. The telecom service providers can easily keep a track of the volumes since their routes are used to manage the calls.

4. Mail/Audiotex/Unified Messaging Services licensees to Unified Licence?

Solutions Infini's Viewpoint:

We strongly believe that the services mentioned above rather come in the category of "content services" and not "carrier services" and hence we deduced a suggestion that instead of getting a license, a registration process will suffice the pro monitoring and legal aspect confrontation for the services.

5. Please give your comments on any related matter, not covered above.

Solutions Infini's Viewpoint:

A few suggestions from our end could be drawn as the following points:

- We believe that a simple VAS registration which has a similar framework as that of telemarketer registration would simplify the entry level processes and bring in all the businesses in a single framework.*
- This will account for increased assurance for legitimate businesses in the market and will also correspond to enhanced tracking and controlling VAS registrations for the regulators.*

In simple words, we would like the policies of A2P infrastructure to be reshaped in the similar sense to that of telemarketing policies structure in a flexible manner.



Solutions Infini Technologies (I) Pvt. Ltd.

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