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07 December 2015

Shri Arvind Kumar
Advisor (Network, Spectrum & Licensing)
Telecom Regulatory Authority of India
Mahanagar Doosanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi 110002

Subject: Consultation Note on IP Based Interconnection

Dear Sir,

This is with reference to the above referred consultation note issued by TRAI on 27th November 2015.

In this regard, please find enclosed herewith our response to the consultation note as an Annexure.

We hope that the TRAI will find our response useful and consider our inputs while formulating the regulation on the subject.

Thanking you,

Yours sincerely,
For **Telenor (India) Communications Pvt. Limited**
(erstwhile Telewings Communications Services Pvt. Limited)

A handwritten signature in black ink, appearing to read "P. Sharma", written over a light blue circular stamp.

(Pankaj Sharma)
Sr. Vice President and
Head Corporate Affairs

Encl: a.a

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Telenor (India) response to Consultation Note on IP Based Interconnection (CP No. 7 of 2015)

We had submitted our detailed response to the **Consultation Paper No: 8/2014 on Migration to IP based Networks** in August 2014, in addition to that we submit our response to the specific issue under this consultation.

The copy of the DoT letter no. 20- 281/2010-AS-1 Vol.9, dated 10.11.2015 regarding 'Regulation of IP interconnection charges' is not provided along with this Consultation paper. This consultation paper does not mention any charges, rather it is limited to facilitating licensees to interconnect over IP based networks or any other emerging/ latest technology. Hence, we restrict our response to the limited issue of interconnection only.

The objective of the proposed amendment is to facilitate IP interconnection. This is adequately covered in the present license; hence any amendment is not desirable. However, in case the licenses are amended for the purpose of bringing clarity, we submit the following:

- a) There should not be any mandate for IP based interconnection, however it may done on the basis of mutual agreement. There should not be any mandate to migrate existing interconnection arrangements to the new IP based regime; rather it should be driven by technological advances. In summary TPM and IP based interconnection should co-exist.
- b) Interconnection should be between licensed entities only.
- c) The current minute based Interconnection usage charges regime should be continued. The TDM or IP based interconnection should be for voice and SMS only.
- d) The call routing hierarchy should be maintained and it should not be circumvented in the garb of technological advancements.

The present license does not require any amendment. However, if the Authority feels the need to modify for the purpose of clarification, then we propose the amended condition as below:

Proposed text in Consultation paper	Proposed by Telenor (India)
27.3 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	27.3 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/



<p>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>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. (no change)</p>
<p>27.3.1</p> <p>Interconnection between the IP based networks of different licenses for carrying IP traffic shall be within the overall framework of the interconnection regulation/ directions/ orders issued by TRAI/Licensor from time to time.</p>	<p>27.3.1</p> <p>Licensee may also interconnect their Circuit switched network or IP based network with other UL/UASL/NLD/ ILD licensee using any ITU/TEC specified standard based on mutual agreement. Such arrangements shall be subject to RIO / SIO and shall be on a non-discriminatory and non-preferential basis.</p>
	<p>27.3.2</p> <p>All such interconnection between networks of different licensees shall be within the overall framework of the interconnection regulation/ directions/ orders issued by TRAI/Licensor from time to time.</p>

