

VTL/Reg/TRAI/1707/5198
July 20, 2016

Shri U. K. Srivastava,
Pr. Advisor (Networks, Spectrum & Licensing),
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Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi — 110 002

**Subject: VTL Response on Consultation Paper on "Review of Voice Mail/Audiotext/
Unified Messaging Services Licence"**

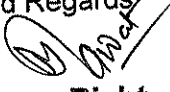
Ref: TRAI Consultation Paper No. 12/2016 dated 14th June, 2016

Respected Madam:

Videocon Telecommunications Limited welcomes the opportunity to give our comments to TRAI's consultation Paper on "**Review of Voice Mail/Audiotext/Unified Messaging Services Licence**" Please find attached herewith our response on the same.

This is for your information and kind consideration please.

Kind Regards



Meena Bisht
Sr. Manager - Regulatory Affairs
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Encl.: as above

VTL Response to Consultation Paper

on

'Review of Voice Mail/Audiotext/Unified Messaging Services License'

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

Response: We are of the opinion that Voice Mail Service should be included under the UL license as one of the services requiring authorization.

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: No comments

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

Response: We are of the opinion that Voice Mail Service should be included under the UL license as one of the services requiring authorization.

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: No comments

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

Response: We are of the opinion that Voice Mail Service should be included under the UL license as one of the services requiring authorization.

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



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Response: No comments

Q7. Is it necessary to have a separate License for Unified Messaging Service when holding an ISP License 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: We are of the opinion that UMS Service should be included under the UL license as one of the services requiring authorization. Those who are interested to become ISP Licensee can opt for UMS under UL.

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: No comments

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

Response: Yes the license should be a part of Unified License- as one of the services requiring authorization. The public network service providers such as PLMN/PSTN Operators should not be required to take the separate License for these services and should be included by default in the UL.

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: Yes 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.

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

Response: There should not be any separate entry fee.

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



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Response: There should not be separate requirement as Voice Mail/Audiotex/Unified Messaging Services authorization shall be under Unified License as default services.

Q13. The annual License 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 License? If not, why?

Response: License fee should continue to be NIL. To encourage small players who are not into access services, and operating in such services, LF should be NIL.

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 License?

Response: NA

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

Response: The existing fee structure should continue.

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

Response: Yes duration of the license with Voice Mail/Audiotex/Unified Messaging Services authorisation be made 20 years as in the other license authorisations under Unified License.

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

Response: Migration to UL should not be mandated.

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 License?

Response: Yes, the existing Voice Mail/Audiotex/Unified Messaging Services licensees should be allowed to continue.



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Q19. What should be the annual License 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 License?

Response: NIL

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

Response: Existing Technical Specification under Audiotex License for providing audio conferencing services, IVR Service, Voice mail services etc are sufficient and no separate modification is required. However, two party conferencing facility without violating Audiotex License guidelines and without bypassing any ILD/NLD services should be also allowed as a sub set of multi party conferencing facility.

There are multiple value added services which are provided by OTT players, VAS vendors and Mobile app providers which should also be examined so that License provisions under Audiotex License remain contemporary and relevant.