RJIL/TRAI/2025-26/653
29th December 2025

To,

Shri Sameer Gupta,
Advisor (Networks, Spectrum and Licensing-I)
Telecom Regulatory Authority of India,
Tower-F, World Trade Centre,
Nauroji Nagar, New Delhi – 110029.

Subject: **RJIL's counter comments on TRAI's Consultation Paper on Review of existing TRAI Regulations on Interconnection matters.**

Dear Sir,

Please find enclosed the counter comments of Reliance Jio Infocomm Limited (RJIL) on the TRAI's **Consultation Paper on Review of existing TRAI Regulations on Interconnection matters** dated 10.11.2025.

Thanking you,

Yours Sincerely,
For **Reliance Jio Infocomm Limited**

KAPOOR SINGH GULIANI

Digitally signed by KAPOOR SINGH GULIANI
Date: 2025.12.29 15:58:17 +05'30'

Kapoor Singh Guliani
Authorized Signatory

Enclosure: As above

Reliance Jio Infocomm Limited's counter comments on TRAI's Consultation Paper on "Review of existing TRAI Regulations on Interconnection matters" dated 10th November 2025

1. We appreciate the opportunity provided by the Telecom Regulatory Authority of India (TRAI) to present our counter comments to stakeholder comments on the Consultation Paper on the "Review of existing TRAI Regulations on Interconnection matters."

2. At the very outset, we reiterate our submission to the CP and request you to treat the same as part and parcel of this submission. Our key submissions are summarized below.

   a **The Interconnection regime should be modernized to support new technologies.**

   b **IP interconnection should be mandated, and unification of POIs should be facilitated.**

   c **A2P voice and SMS shall not be part of mandatory interconnection and IUC set for P2P voice and SMS.**

   d **Application Providers/Telemarketers may be given a choice to either connect the termination operator directly or through any other operator using the PoIs established for A2P traffic.**

   e **The levels of interconnection should be upgraded to LSA level on immediate basis and a glide path should be provided for centralized and Unified POIs.**

   f **Irrational and obsolete concepts like mandatory transit charge imposed by BSNL should be abolished.**

   g **The POI infrastructure charges including port charges should be on cost basis and on reciprocal basis and each TSP should bear costs for its outgoing traffic.**

   h **The annual emergency service charges by BSNL should be cost based following principle of equality and should be governed by TRAI regulations.**

   i **There is a need to review ITC charges and address the menace of flash calls and SPAM/Fraud calls.**

   j **There is a no need to review the present cost-based SMS IUC charges. However, there is an urgent need to increase/ introduce deterrent charge for both A2P SMS and Voice calls.**

   k **There is a need to introduce SMS carriage charges for inter-LSA SMS.**

3. We had the opportunity to go through the comments by stakeholders and the these can be divided into following broad categories

    I. **Opposition to modification in current interconnection framework and to taking action at interconnection level to address menace of robocalls.**
    II. **Opposition to mandatory migration to LSA based interconnection and proposal to continue with the mutually agreed lower levels of interconnection.**
    III. **No need for mandating IP interconnection.**
    IV. **International termination charge should be cost basis.**
    V. **SMS termination charge should be cost-based.**
    VI. **There is a need for annual charges for emergency services and proposal to make BSNL mandatory infrastructure provider.**
    VII. **Special interconnection dispensation for satellite-based communication service providers.**

4. Our counter comments on the above issues are as below.

I. Opposition to modification in current interconnection framework and to taking action at interconnection level to address menace of robocalls.

RJIL counter comments:

5. Some stakeholders have submitted that there is no need to modify the current interconnection framework and that there is no need for interconnection level action to address the issue of robocalls. We submit that these submissions are bereft of any technical or logical justification or any global precedents and should be ignored.

6. We reiterate our submissions that the current interconnection framework was not designed for modern technological challenges and it is imperative that the interconnection Regulations are updated to reflect the modern technological changes as well as challenges.

7. The telecom spam has emerged as an unintended consequence of the rapid growth of digital communications. Existing interconnection systems and agreements, including the broader interconnection framework were not designed to address unsolicited messages and calls at this scale.

8. The interconnection framework started with PSNT interconnection, and evolved to include digital communications, however, it was always designed to cater the needs for Person-to-Person (P2P) communication and is ill-equipped to face the avalanche of Application to

Person (A2P) messages and calls and needs to be upgraded to meet the requirements of these new age communications.

9. It is submitted that the entire gamut of interconnection regulations, including those pertaining to Reference Interconnect Offer (RIO), Interconnection Usage Charges (IUC), and Telecom Interconnection Regulation have been intended and designed to ensure smooth and hindrance free P2P traffic to ensure every subscriber is able to connect to any other subscriber.

10. However, a mandatory interconnection agreement is not a prerequisite for **A2P voice and messaging traffic**, as telemarketers and aggregators can directly connect with multiple operators. To effectively curb spam, it is essential to create a strong deterrence. Accordingly, we propose the explicit exclusion of A2P traffic from the mandatory interconnection regime, enabling TSPs to levy a deterrence charge on aggregators/telemarketers at the A2P Point of Interconnection (POI), thereby disincentivizing spam traffic.

11. All A2P calls, including those originating from the 1400 and 1600 number ranges, should be identified by the Originating Access Provider (OAP) and delivered through designated A2P POIs. A deterrence charge of at least (floor charges) Rs. 0.50 per minute for voice and Rs. 0.12 per SMS should apply. Currently, a deterrence charge of Rs. 0.05 per SMS is already in place but there is no deterrence charge for voice call leading to huge shift of SMS based SPAMs to voice-based SPAM calls. We have enclosed a detailed note as **Annexure** on A2P POI process with this submission and request the Authority to take the same into consideration.

II. Opposition to mandatory migration to LSA based interconnection and proposal to continue with the mutually agreed lower levels of interconnection.

RJIL counter comments:

12. Some stakeholders, including those who are not even part of entire interconnection ecosystem, have submitted that there is no need to mandatorily move to LSA based interconnection and we can still live with mutually agreed POIs. However, all anomalies in the interconnection operations are caused by the insistence of one service provider to not move away from SDCA / LDCA based interconnection for fixed services despite of entire industry mutually agreeing for LSA based interconnection. Thus, such submissions, driven primarily by a desire to preserve legacy architecture or an obstructionist stance against any reforms relating to TSPs, lack substantive merit and should be disregarded.

13. We submit that the Authority has taken multiple persuasive steps to migrate the Fixed interconnection to LSA level through Telecommunication Interconnection Regulations, 2018

(TIR 2018) and highlighted the need for this migration under its Recommendations on Revision of National Numbering Plan dated 6th February 2025, as it would be critical for moving to 10-digit closed numbering scheme and then to Fixed location Routing number (FLRN) based unified numbering scheme. However, these positions have been blatantly flouted, the timeline of 5 years in TIR 2018 to end SDCA based structure is already over but ignored.

14. **Evidently, the policy intent of immediate migration to LSA based interconnection is not sufficient and we require a mandate to the PSU operators to implement the same.**

15. However, as submitted before, we should not stop at this level, the Authority should facilitate mutual agreement-based unification of POIs of all type of traffic and the provision to take the level of interconnection **beyond LSA level. Thus, we reiterate our submission that the Regulations should facilitate centralized and unified POIs.**

III. No need for mandating IP interconnection.

RJIL counter comments:

16. We reiterate our submissions that while the Authority has facilitated IP-based interconnection, the pace of migration for IP based POIs at all levels is not optimum. The situation worsens when there is no progress from a key operator like BSNL for moving towards IP interconnect for improved customer experience. We request the Authority to intervene and provide for a time-bound migration plan for IP based interconnection.

17. Further, the Authority is requested to mandate inter operator SMS communication using IP interconnect for service resiliency and technology evolution. It is submitted that SMS interconnect within main private operators has already migrated to IP using SigTran, However, BSNL is still continuing with TDM based HSL links. We request the Authority to include mandatory IP interconnection for SMS in the regulations so that all SMS interconnection is IP based.

IV. International termination charge should be cost basis.

RJIL counter comments:

18. One stakeholder has submitted that the International Termination Charges (ITC) should remain cost based while another has submitted it should be revised marginally upwards. We submit both these positions lack the in-depth understanding of the international termination market and should be ignored. We reiterate our submissions that there is an urgent need upward revision of ITC to make it at least Rs. 4 per minute.

19. We submit that ITC in India remains the lowest in the world and we continue to pay much more to other countries especially the Middle East ones and the blended termination rate paid by ILDOs for outside India termination to foreign carriers comes to around Rs.4.50 per min while the foreign operators merely pay average Rs.1.10 to Rs.1.25 min for India Inbound out of which 65p goes as ITC and there is a need to bring in a balance in this.

20. Another key aspect to remember is the settlement in US dollars with global operators which keeps on increasing the burden on Indian operators. Thus, the only way to change this skewed market structure is to increase the ITC for the global operators to terminate voice calls into India. This will also account for the foreign exchange aspect.

21. We have already addressed the Authority's analysis on falling ILD minutes, and OTT substitution in our comments. We reiterate that the OTT substitution causing the fall in traffic is happening despite lower ITC for last 5 years, thus clearly lower ITC serves no purpose on this count. Further, as our major ILD traffic is with Middle East countries that do not allow OTT app calling, thus no major impact will be seen on MOUs due to increase in ITC. Therefore, we reiterate our submission to increase the ITC to at least Rs. 4 per minute.

22. We would also reiterate our submission on mandatorily changing the ILD incoming pulse to 60/60 from 1/1 to address spam and menace of flash calls on ILD networks.

V. SMS termination charge should be cost-based.

RJIL counter comments:

23. Some stakeholders have sought a cost-based reassessment of the SMS termination charges which are at 2p/SMS at present. We submit that this position has no justification as the SMS termination market is working well and there is no market failure, and this meagre termination charge is a useful barrier against unregistered spam.

24. We submit that instead the need is to bolster these barriers against spam by mandating separate A2P POIs and deterrent A2P sms charges as 12 paise/SMS, inclusive of the 2p termination charges.

VI. There is a need for annual charges for emergency services and proposal to make BSNL mandatory infrastructure provider.

RJIL counter comments:

25. BSNL has sought to defend its imposition of unilateral emergency call charges that include annual charges with 10% annual escalation plus call-based charges on the grounds of investment required for providing this service. We submit that this is an incorrect submission as the investment has been recovered multiple times through annual charges only and now this public service function is being converted to a profit-making venture by a government funded operator.

26. We request the Authority's intervention in addressing this anomaly by making the emergency calls completely free on any BSNL charges and to also address all the irrational charges being imposed by BSNL unilaterally on TSPs as these charges go over and beyond the regulatory mandate and are continued from the times when BSNL was the incumbent dominant operator. Further, with centralised PSAP implementation in most of the states, all TSPs have established direct connectivity for termination of emergency calls and BSNL has no role in termination of such traffic. Under such circumstances, BSNL's demand for continuation of annually escalating charges for emergency calls termination is outrageous and unjustified.

27. Further, we do not agree with BSNL's proposal to make itself mandatory and default infrastructure provider for TSPs basis some global examples. We submit such examples cannot be picked out at random and in isolation. First the wannabe IP should not be a competitor in same market and second it should have better infrastructure to offer before making such suggestions. Thus, we request you to ignore this suggestion as well.

VII. Special interconnection dispensation for satellite-based communication service providers.

RJIL counter comments:

28. One respondent has sought special interconnection dispensation for fixed and mobile services offered by satellite-based communication service providers. It has sought Gateway level IP POIs for satellite-based service providers while simultaneously seeking continued utilization of BSNL's lower-level POIs and interconnection at mutually agreed lower levels of interconnection for terrestrial service providers.

29. We submit that there is no need for separate interconnection dispensation for satellite-based services. The Satellite based communication services will be offered by the service providers only under access services authorization and therefore there is no need for a separate interconnection regime for these service providers, and they should seek interconnection as per the existing regime.

Annexure

<u>Proposal to Control Spam by Segregating A2P and P2P Traffic</u>

1. Background

Under the existing interconnection framework, the Points of Interconnection (PoIs) established between operators carry both Person-to-Person (P2P) and Application-to-Person (A2P) voice and SMS traffic.

Several Unified Licensees (Access Service) despite having zero or very small active subscriber bases, have entered into interconnect arrangements and obtained PoIs for terminating A2P traffic originating from aggregators and call centres.

Because bulk communication providers (aggregators/call centres) are typically located at limited geographic locations, these licensees find it operationally easy—and commercially attractive—to deploy PRIs at these locations, collect bulk A2P traffic and terminate it on Telecom service provider's (TSP's) network.

The current regulatory regime, which prescribes **zero termination charge for voice** and **extremely low IUC for SMS (2 paise + 5 paise)**, enables such operators to retain a disproportionately large share of A2P revenue with minimal network investment.

A significant portion of spam and fraudulent calls/SMS received by India's over 1000 million subscribers originate from these bulk routes controlled by such operators. However, due to the mandatory nature of current interconnect obligations, TSPs have limited capability to:

- Selectively filter or block traffic from such operators,
- impose deterrence charges, or
- disconnect/penalize operators routing spam or fraudulent traffic.

This creates a three-fold disadvantage:

1. **Customer dissatisfaction** due to inability to effectively curb spam and fraud.
2. **Regulatory scrutiny and penalties**, as TRAI's UCC framework assigns responsibility for detection to the terminating operator.
3. **Loss of legitimate revenue**, as smaller operators exploit zero/low IUC while leveraging TSP's infrastructure.

2. Proposal

Historically (prior to 2010–2012), interconnection PoIs were used exclusively for P2P traffic. A2P SMS was predominantly on-net, and A2P voice was limited due to high termination charges.

Following the introduction of TRAI's UCC regulation and the recognition of off-net A2P traffic, the same PoIs began carrying bulk telemarketer traffic. After voice IUC moved to a Bill-and-Keep regime, off-net A2P traffic grew substantially because originating operators retain the majority of the revenues. Consequently, several operators have built a business model focused solely on enterprise/telemarketing traffic.

It is therefore proposed that:

1. **Existing interconnection agreements should be restricted strictly to P2P traffic.**
2. **A separate, dedicated interconnection agreement must be executed for A2P traffic**, with distinct commercial, technical and operational terms.

While some operators may resist this change, it must be firmly communicated that mandatory interconnect obligations under the regulatory regime apply **only to P2P traffic** and **not** to A2P enterprise communication.

3. Expected Benefits

a) Prevention of Regulatory Arbitrage

Telemarketers and aggregators currently exploit the zero-IUC regime for P2P SMS/voice to avoid paying commercial A2P termination rates.

Under a separate A2P agreement, TSPs can prescribe **a deterrence termination charges (e.g., 50 paise per voice call)** for A2P traffic.

This will:

- increase enterprise communication revenues, and
- discourage misuse of the P2P route by telemarketers.

Originating operators will be compelled to factor this termination charge into their commercial offerings to telemarketers/aggregator, eliminating arbitrage.

b) Logical and Operational Segregation of Traffic

A2P traffic will be routed exclusively through **dedicated A2P PoIs**, by logically separating or establishing new PoIs.

This gives TSPs the technical capability to:

- apply AI-based spam/fraud detection tools,
- block or throttle suspect traffic, and
- enforce stricter controls on enterprise routes.

c) Improved Traceability and Accountability

Operators must share identifiers of PRIs issued to telemarketers for promotional and transactional purposes. This will enable TSPs to maintain route-level visibility and apply filters accurately.

d) Enforcement and Compliance

The new P2P agreement will include **penalty provisions** for any operator routing A2P traffic through P2P PoIs. This creates a strong deterrent against misuse.

4. Conclusion

Segregating P2P and A2P traffic through separate agreements and dedicated PoIs is essential to:

- Curb spam and fraudulent calls/SMS,
- Ensure regulatory compliance,
- Restore customer trust, and
- Secure fair commercial value for the use of TSP's network.

This proposal aligns with global best practices where enterprise communication traffic is commercially and operationally distinct from retail person-to-person traffic.