



VIL/P&O/TRAI/2025/134

December 29, 2025

Advisor (Networks, Spectrum and Licensing-I)
Telecom Regulatory Authority of India,
4th, 5th, 6th & 7th Floor, Tower-F,
World Trade Centre, Nauroji Nagar,
New Delhi – 110029

Kind Attn: Shri Sameer Gupta

Subject: Counter Comments on the TRAI's Consultation Paper on "Review of existing TRAI Regulations on Interconnection matters" issued on 10.11.2025.

Dear Sir,

This is in reference to the TRAI's Consultation Paper on "Review of existing TRAI Regulations on Interconnection matters" issued on 10.11.2025.

In furtherance to the comments submitted by us vide our letter no. VIL/P&O/TRAI/AK/2025 dated 15.12.2025, kindly find enclosed herewith counter-comments from Vodafone Idea Limited on the above-said consultation paper.

We hope our submission will merit Authority's kind consideration.

Thanking you,

Yours sincerely,

For Vodafone Idea Limited

Ajay Mehta

VP- TRAI Policy & Ops; Strategic Projects

Enclosed: As stated above

**VIL Counter Comments to the TRAI Consultation Paper on
"Review of existing TRAI Regulations on Interconnection matters "**

This is with reference to the TRAI Consultation Paper on "Review of existing TRAI Regulations on Interconnection matters" dated 10.11.2025 and the comments from various stakeholders on this paper, as uploaded on TRAI's website.

Vodafone Idea Limited (VIL) has submitted comments to the questions raised in the above-said consultation paper. Further, we have also gone through the comments of various stakeholders on the above-said consultation paper and would like to submit our counter-comments for Authority's kind consideration, as given below:

1. Security concerns on IP interconnection:

- a. One of the stakeholders has raised a concern that migrating rapidly to IP interconnection without robust security etc could compromise network reliability and user experience.
- b. In this regard, we submit that globally the TSPs have either moved to or are in process of moving to IP interconnection. In India also, private TSPs have put in place IP based interconnection and new ports are provisioned only on IP interconnect.
- c. Given that IP based interconnects are the latest, modern way of POIs, they are proven technology across the globe. IP interconnection is secured, robust, fast, economical and easy to maintain, and adequate security mechanisms are already available to safeguard IP based POIs.

2. Surrender/Disconnection of Ports / POI

- a. One of the stakeholders has mentioned that there should be a minimum retention period of atleast 24 months before surrender. It has also mentioned that traffic reconciliation and final settlement of charges should be done before surrender request is entertained. It has also sought mandating minimum 90 days' notice period with advance payment.
- b. In this regard, we submit that the interconnection arrangement with the PSU are one-side and provide ambiguous as well as unrestricted influence to the PSU and is exercised mostly at the cost of other TSPs.
- c. Entire cost of a POI is loaded on the private TSP and one-sided self-decided charges are taken by the PSU. This means that the cost of inefficient and outdated interconnection structure of PSU TSP is sought to be compensated by the private TSP.
- d. If regulatory reciprocity is ensured, none of these conditions would be sought by the PSU operator, as it will also have to undergo similar treatment for its outgoing traffic and hence,

a balanced approach would come out which will be beneficial and win-win for all the stakeholders.

- e. The billing between the TSPs happen at LSA level so, even the idea of settling the charges before a POI/port surrender is practically challenging and would again provide one-sided influencing power to the PSU operator, who has always been found wanting on adhering to timelines.
- f. It is also incorrect to say that its only PSU operator who bears the cost whereas true picture is that to fulfill license conditions on interconnection, its both interconnection seeker and interconnection provider who bears the respective cost of interconnection for their outgoing traffic.
- g. Thus, it is important that strict timelines, process as well as reciprocal conditions are prescribed by TRAI, so that migration to higher level of POIs i.e. LSA level / IP-interconnect can be ensured without any procedural delay being caused by any stakeholder.

3. Interconnection at LSA level

- a. One of the stakeholders has mentioned that it has installed huge infrastructure in all LDCA (330 approx.) to provide Interconnection to private TSPs in accordance with extant Regulations, spending crores of rupees and now the same TSPs are demanding disconnection at level 2 Tax locations and connectivity at level-1 TAX.
- b. Again, this is a typical way of inefficiency being carried forward till now, and sought to be carried forward in future. With dwindling fixed line traffic, it doesn't make economical or operational sense to keep POIs at lower levels of LDCA or SDCA. In 2018 as well as in 2020, we have sought moving to LSA based interconnection and not to LDCA based interconnection.
- c. Given that interconnection is a licensing and regulatory mandate, the infrastructure cost is equally applicable to all TSPs and should apply for their outgoing traffic only. Average life of any telecom equipment is 10-12 years or lesser. As the technologies are continuously evolving Private TSPs have already moved to IP based POIs. Unfortunately, Public TSP still insist on old obsolete TDM based interconnection and that too at sub-LSA interconnect.
- d. It is important to mention that all private TSPs are at LSA level interconnection even for new TSPs who have got licensees/authorisations in last few years. It is instead PSU operator which wants to continue with inefficient sub-LSA interconnection since, the one-sided terms and conditions will financially benefit the PSU operator at the cost of private TSP. Currently it's a huge burden to private TSPs as they have to pay multiple charges and arbitrary processes/conditions such as
 - i. Port charges
 - ii. Setup charges
 - iii. POP charges (10% increase every year)
 - iv. Duct charges (5% increase every year)

- v. Passive charges
- vi. Active charges
- vii. Microwave charges (10% increase every year)
- viii. Surrender charges
- ix. Lease line charges,
- x. Lumpsum Emergency call charges etc.

- e. On the contrary Public TSP never pays any charges to private TSP, in spite of the huge cost of installing and maintaining the infrastructure, which is unilaterally borne by Private TSPs.
- f. Further, While PSU TSP has consolidated its switching nodes (L1 Tax and L2 Tax are merged into common IP Tax) at 1 or 2 locations per circle but, the interconnection is sought to be at LDCA levels.
- g. Considering all above, we strongly urge the Authority to mandate interconnection only at LSA level POIs or for multi-LSA POIs based on mutual agreements. Further, the Regulator should also prescribe reciprocal charges for interconnection, which should be based on outgoing traffic without any exception to ports/POIs whether before any date or after.

4. SMS through IP interconnect

- a. One of the stakeholders has requested the Authority to mandate inter operator SMS communication using IP interconnect for service resiliency and technology evolution.
- b. We support this and request the Authority to mandate IP interconnect (at STP / DRA) for SMS communication as well.

5. Migration to IP Interconnect

- a. One of the stakeholders have mentioned that the migration to IP Interconnect should be based on mutual agreement.
- b. In our view, the private TSPs have already migrating their traffic to IP interconnect based on the mutual agreements. However, the PSU has so far not migrated to IP Interconnect, owing to its one-sided agreement provisions which unjustly enriches it at the cost of other TSPs and hence, would always be inclined to continue on outdated TDM interconnections.
- c. Therefore, for the country, consumers and the telecom ecosystem to get benefitted from the evolved and advanced technologies, migration to IP interconnect should be mandated in a phase-wise manner.

6. Timelines for Migration to IP Interconnect

- a. One of the stakeholders has sought a transition time-period of 5 years.
- b. In our view, a timeline of 5 years is too long for transitioning to an evolved and technologically advanced interconnect i.e. IP interconnection. The timeline should be such that it balances the need of planning, putting Capex and purchase of equipment in a phase-wise manner and at the same time, ensures the benefit of such IP Interconnect is not delayed superficially.
- c. Therefore, we strongly recommend a timeline for 3 years for migrating to IP interconnect. We reiterate following phase-wise milestones for the said migration to IP Interconnect.
- d. **Phase 1 - Immediate (Within 6 & 12 months of issuance of Regulation) and ongoing thereafter:** New Capacity augmentation of new POI or in existing POI, should be only on IP interconnection after 6 months of issuance of Regulation and Within 1 year, 10% traffic to be migrated to IP interconnection.
- e. **Phase 2 - Short-Term (Within 18-24 months of issuance of Regulation):** Require operators to have a significant percentage (i.e. 50%) of their total interconnection capacity migrated to IP.
- f. **Phase 3 - Final Sunset (Within 3 years of issuance of Regulation):** Mandate migration of entire traffic to IP based interconnection and complete discontinuation of all TDM E1 interconnections. In this phase, all remaining TDM links must be migrated to IP.

7. Uniform Port charges

- a. One of the stakeholders has stated that Uniform charges may not be feasible across all services due to distinct technical characteristics, network architecture, cost structure, resource consumption, and traffic handling capabilities across services and interconnection technologies.
- b. In this regard, we would like to submit that IP port charges must be kept uniform across licensees/authorisations, as it has not bearing to the type of service and underlying network. The rationale provided that ILD ports require added compliance/security and that mobile ports involve higher signalling/QoS is not accurate.

8. Porting of Intelligent Network (IN) numbers

- a. One of the stakeholders has requested the Authority to enable porting facility of IN numbers, while it may not be part of this consultative exercise.

- b. We support this and request the Authority to consider the same.

9. Termination Charges for Incoming International call

- a. Many stakeholders have supported the view of increasing the termination charges for Incoming international calls. One of the stakeholders has mentioned that it should be increased to at least Rs 4 per minute.
- b. In continuation to the rationale mentioned in our comments, we strongly support the same and request the Authority to increase the termination charges for Incoming international call to Rs 4 per minute.

10. Termination Charges for Incoming International SMS

- a. One of the stakeholders has mentioned in their comments that the International incoming SMS termination charges should be regulated.
- b. We do not support the same as the existing framework of forbearance for the International incoming SMS is working fine and there is no need of any regulatory intervention in this regard.

11. Separate Inter-operator Charging for A2P voice calls

- a. One of the stakeholders has sought a deterrent charge of Rs 0.50 for all A2P voice calls. It tries to justify the charge based on hypothetical logics of such charge being able to disincentivize spam calls.
- b. We outrightly disagree with the said logic and there is no need to have any separate charge for A2P voice calls at this stage.
- c. It is pertinent to mention that Authority is making huge efforts to take care of the consumer concerns of identifying legitimate A2P calls from the illegitimate A2P calls (spam). For this purpose, the Authority had got 1600xxx series allocated from the DoT for service and transactional calls, besides 140xxx series which is in place for quite some time.
- d. The purpose of allocating 1600xxx series exclusively for service and transactional calls was to identify the legitimate service and transactional calls being made, from the UTM numbers. At present, both the service and transactional calls as well as retail UTM calls, originate from normal 10-digit numbers thereby making it difficult to identify them separately and giving

distinct pre or post-checks, by originating TSP or by Terminating TSP. Thus, 1600xxx series was sought from this identification aspect and there is no inter-operator service expected to be delivered by the terminating TSP for calls from 140xxx and 1600xxx.

- e. **Most importantly, provisions of the TCCCP 2nd amendment mentions that calls from these series should not be tagged as spam by the call management applications. Thus, when the calls from 140xxx and 1600xx has been taken as legitimate calls there is no question whatsoever of putting any charge on these calls citing deterrence for spam calls. Even the Terminating TSPs are not supposed to take any action of 'blocking' or 'tagging as spam' on the calls coming from 140xxx and 1600xxx series originating from other TSP's network.**
- f. It may be noted that the TSPs have faced humungous resistance for getting the existing 10-digit resources migrated to this 1600xxx series, without causing any disruption to the calls/services or the business models of the financial and Government sector. The uptake of 1600xxx series as well as 140xxx will depend on the simplicity and cost-effectiveness of the solution being offered by the telecom industry, so that it can be easily and quickly adopted by the entities from financial sector and Government.
- g. The inter-operator separate charge for A2P calls will act as a gigantic road block as it will significantly increase the cost per call for the principal entities. Increase in cost per call for legitimate voice calls will be taken negatively by all sectors including the financial sector and cause uncertainty in approach.
- h. Further, it will also change the business model presently working where PEs are generally charged for the resources based on bandwidth provided and not on calls made. Any change in such charging model will require processing of huge calls, both for billing the PEs as well as for settlement of inter-operator charges. This would put huge strain on the existing technical systems and will require huge expenditure and time for augmenting resources, causing a delay of atleast 2-3 quarters.
- i. Considering above, any termination charge for 1600xxx series at this stage, will significantly delay the adoption of this series and thus, will eventually undermine as well as delay the Authority's efforts in curbing spam. If the series is not adopted by the Entities, due to higher cost and complexity, it will lead to continuation of calls from normal 10-digit number. The industry has already seen failure of a promising Digital Consent Acquisition functionality, which even after spending huge cost, resources and time, has not taken off in the field.
- j. Further, Authority with support of RBI has initiated a pilot of Consent Registration framework wherein Banks are participating along with TSPs. It is expected that in natural course, commercial go-live regulatory norms will also be issued by the Authority. Now, the consents being uploaded on the TSP's systems will be used for both promotional SMS and promotional voice (140xx series). If inter-operator charges are prescribed for 140xxx series at this stage, it will derail the launch of Consent Registration framework and will significantly jeopardise the successful implementation post commercial launch.

- k. In our view, any inter-operator charge for A2P voice calls i.e. calls originating from 140xxx and 1600xxx series will be counter-productive and go against the efforts of the Authority to push for adoption of 1600xxx series by BFSI and any new series for other sectors as well as Consent Registration framework which will heavily rely on promotional calls through 1400xxx series.
- l. These two noble initiatives of the Authority have the potential of changing the way unregistered telemarketing activity (spam) is being dealt today and would empower consumers with easy identification of commercial communication calls as well as empowering them with easy and simpler consent revocation facility. Thus, any such inter-operator charge for A2P voice calls is gravely against the consumer interest as well.
- m. Considering all above, we strongly recommend that no inter-operator charges are needed for A2P voice calls at this stage. In our view, inter-operator charges on 140xxx and 1600xxx series can be reviewed after 2 years, after adequate adoption and stabilisation of processes.

12. Segregation of A2P traffic

- a. One of the stakeholders has also sought segregation of A2P traffic through logical and operational segregation and routing it exclusively through dedicated A2P Pol's.
- b. In this regard, we reiterate that there is no need to have inter-operator charges for A2P voice calls and consequently, neither there is any need of segregation of A2P traffic nor for setting up of dedicated A2P Pol's.
- c. **Most importantly, provisions of the TCCCP 2nd amendment mentions that calls from the series identified for commercial communications (i.e. 140xxx and 1600xxx) should not be tagged as spam by the call management applications.**
- d. **Thus, the calls from these series have been treated as legitimate calls as such, even the Terminating TSPs are not supposed to take any action of 'blocking' or 'tagging as spam' on the calls coming from 140xxx and 1600xxx series originating from other TSP's network.**
- e. **Therefore, the ask of having segregation of A2P traffic and setting up of dedicated A2P Pol's, is devoid of any rationale or merit.**