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CONSUMER CARE SOCIETY®
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(Regd.under Karnataka Societies Regn. Act. 1960)
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June 2, 2008

Telecommunication Regulatory Authority of India
New Delhi

Attention; Sh. S. K. Gupta, Advisor (Converged Network), Tel.No. 23217914,
Fax: 23211998, email at skgupta@traigov.in or guptask61@gmail.com

Dear Sir,

Subject: TRAI C. P. No 11/2008 on issues relating to Internet Telephony

Following are our views: References are to the TRAI CP referred above.

Chapter 4

Issues for Consultations

4.1 Whether Internet service provider should be permitted Internet Telephony services to PSTN/PLMN within India?

If yes, what are the regulatory impediments?

How such regulatory impediments can be addressed?

Please give your suggestions with justifications.

Comments: Yes, Internet service providers should be permitted to offer Internet Telephony services within India.

Regulatory levies are different for these two services.

As the two services IE internet telephony and PSTN/PLMN are different, the differential levies are justified. If it is possible for the customer to make an informed choice of type of telephony service, say by a special access code, it might offer a solution.

4.2 Whether allowing ISPs to provide Internet Telephony to PSTN/ PLMN within country will raise issues of non-level playing field? If so, how can they be addressed within present regulatory regime? Please give your suggestions with justifications.

Answer: Solution in para 13.2.2 seems a good way to solve this issue, particularly because ISPs will be late starters for offering telephony services. PLMN and PSTN have early starters' advantage.

4.3, 4.4 4.5 4.6 4.7, and 4.8

All the above issues are highly technical and very specialized knowledge is needed before any comment can be offered. Best option seems to be to have a committee of specialists drawn from PSTN, PLMN, ISP and DoT, TEC meet under the Chairmanship of TRAI and decide issues ASAP. An option could even be forming a Working Party to go into micro details and adopt best practices. One cannot solve all issues at any time, hence work out a best compromise and proceed.

4.9 Is there any concern and limitation to facilitate lawful interception and monitoring while providing Internet telephony within country? What will you suggest for effective monitoring of IP packets while encouraging Internet telephony? Please give your suggestions with justifications.

Answer: Yes, our country being a terrorist target from rogue organizations, nothing which compromises can be even considered. We have instances of emails being the communications channel for clandestine activities.

4.10 Is there a need to regulate and mandate interoperability between IP networks and traditional TDM networks while permitting Internet telephony to PSTN/PLMN within country through ISPs? How standardization gap can be reduced to ensure seamless implementation of future services and applications? Please give your suggestions with justifications.

Answer:

Yes, multiple types of network for same type of service must be avoided

4.11 Is there a need to mandate QoS to ISPs providing Internet telephony to PSTN/PLMN within country? Please give your suggestions with justifications.

Answer: Yes, there cannot be any service without any standards of quality, it can be a lower standard as compared to PLMN or PSTN. The tariff will also be cheaper.

The Consultation Paper is of excellent quality, congratulations on such a comprehensive capture of all the aspects.

Yours Sincerely

G S Gundu Rao
For Consumer Care Society, Bangalore

