

**CONSUMER PROTECTION ASSOCIATION
HIMMATNAGAR
DIST. : SABARKANTHA
GUJARAT**



**Comments
On
Definition of International Traffic**

Introduction :

1. The world of telecommunications is becoming increasingly complex. – From the bilateral system defined by ITU, with secure rules guaranteeing the exchange of international traffic, we have passed to a system dominated by the least-cost routing market, subject to neither regulation nor the law.
2. From an exchange relationship in which the origin, destination, and transit center (if any) were clearly defined, along with their respective share of the fee, we have moved to a situation in which multi-POP (A point of presence - is a demarcation point, access point, or physical location at which two or more networks or communication devices share a connection) operators use whatever means they can to attract

the largest possible amount of traffic to a given destination (regardless of its origin) in a wholesale market.

3. From a market controlled by approximately 200 incumbent operators, we have moved to one in which a large number of operators (over 4000) compete for international traffic, but without elasticity.
4. From a world dominated by fixed telephony, we have entered a world of telecommunications dominated by mobile networks, the main factor of growth in international traffic.
5. These developments have had significant repercussions on most of our countries, with the traffic exchange market subject to strong wholesale pressure.

The wholesale market :

- A market for wholesale selling and buying of international traffic
- Used to purchase traffic intended for various destinations, in hubbing mode
- Providers publish their offers in the form of hubbing lists or A to Z lists
- The lists give the prices offered for different destinations, and break down prices for each specific destination by: – fixed – mobile (different networks) – for fixed, may be broken down further by metropolitan and provincial.
- Competition between the providers has led to a price war that has kept strong pressure on the termination shares.

- Numerous hubbing offers are published every month, making it necessary to identify the best offer (in terms of service quality and price) for least-cost routing.
 - This means that an appropriate organization is needed to optimize selling and buying.
 - Also, least-cost routing tools must be acquired.
 - Major importance should be attached to numbering plans (sale of networks). A mistake by the seller can translate into a significant loss. The slightest vulnerability may be exploited by the unscrupulous.
 - Wholesale is not regulated, service contracts are offered with invoicing.
- Now it is the time to define the term " International Traffic."

ISSUES FOR CONSULTATION :

Q1. Whether it would be appropriate to define the term 'international traffic' in the telecommunication service license agreements as 'the international long-distance traffic originating in one country and terminating in another country, where one of the countries is India'? Kindly provide your response with a detailed justification.

Comments : **Yes.**

The definition of International traffic should be based on Customer Service, Transmission quality, breadth of service offering and value added services.

Definition of Telecommunication by ITU :

Any transmission, emission or reception of signs, signals, writing, images and sounds or intelligence of any nature by wire, radio, optical or other electromagnetic system.

International traffic means, the services of telecommunication connection between two users of the operator's numbering area and the users located on the territory of the another country.

So, we agree with the definition provided by the TRAI that " the international long – distance traffic originating in one country and terminating in another country, where one of the country is India."

Following points should be considered :

Integrity of the international telecommunication network:

The capability of the international telecommunication network to carry international traffic.

Stability of the international telecommunication network:

The capability of the international telecommunication network to carry international traffic in the event of failure of telecommunication nodes or links and also in the face of internal and external destructive actions and to return to its original state.

Security of the international telecommunication network:

The capability of the international telecommunication network to withstand internal and external destabilizing actions liable to compromise its functioning.

International route :

A route for the transmission of traffic between technical facilities and installations located in different countries.

Relation :

Exchange of traffic between two countries, always referring to a specific service if there is between their administration/operating agencies – a means for the exchange of traffic in that specific service :

- Over direct circuit (Direct relation) or
- Via a point in a third country (Indirect relation)

Telephone companies in different countries use a variety of **international telecoms routes** to send traffic to each other. These can be legal (or 'white') routes or other arrangements the industry calls *grey routes, special carrier arrangements, settlement by-pass* and other euphemisms.

ITU :

A term defined by ITU for trade in Telecommunication as " Sales of Telecommunication Equipment or **Services** that cross national border."

In the context of trade in telecommunication services, a country which terminates a call may be considered as " exporting " a call termination

service. Similarly, a country which originates a call may be considered as “ Importing ” a call termination service.

ITU has define the word “ Traffic ” as :

ITU Code	Indicator	Definition
1311m	Local fixed to fixed telephone traffic (Minutes)	Local fixed telephone traffic consists of effective (completed) fixed telephone line voice traffic exchanged within the local charging area in which the calling station is situated. This is the area within which one subscriber can call another on payment of the local charge (if applicable). This indicator should be reported in the number of minutes. This should exclude minutes used for dial-up Internet access.
1312m	Long distance fixed to fixed telephone traffic (minutes)	Long distance fixed telephone traffic consists of effective (completed) fixed national long distance telephone voice traffic exchanged with a station outside the local charging area of the calling station. The indicator should be reported as the number of minutes of traffic. This should exclude minutes used for dial-up Internet access.
131m	Domestic fixed to fixed telephone traffic	Domestic fixed telephone traffic consists of completed local (1311m) and long-distance fixed telephone voice traffic (1312m). The indicator should be reported as the number of minutes of traffic. This should exclude minutes used for dial-up Internet access.
1313wm	Fixed telephone lines to mobile networks traffic (minutes)	Total minutes from the fixed telephone network to the mobile cellular network within the country.

1311im	Internet Dial-up traffic (minutes)	The total volume in minutes of dial-up sessions over the public switched telephone network to access the Internet.
132mb	International incoming and outgoing fixed telephone traffic (minutes)	Sum of international incoming and outgoing fixed traffic (132m+132mi).
132m	International outgoing fixed telephone traffic (minutes)	This covers the effective (completed) fixed telephone voice traffic originating in a given country to destinations outside that country. This should include traffic to mobile phones. The indicator should be reported in number of minutes of traffic.
132m	International incoming fixed telephone traffic (minutes)	Effective (completed) fixed telephone voice traffic originating outside the country with a destination inside the country. The indicator should be reported in number of minutes of traffic.
133wm	Domestic mobile telephone traffic (minutes)	Total number of minutes made by mobile subscribers within a country (including minutes to fixed telephone and minutes to mobile phone subscribers) (133wm = 1331wm + 1332wm + 1332wmf).

Route Quality :

The best quality is usually over ' Bilateral ' : high-capacity direct fiber-optic links between the former national telephone companies. The calls go straight to the far end company managing the national network. Routes to other licensed telecoms companies in de-regulated countries will usually have as high a quality as bilateral. Satellite transmission adds a slight delay,

which is noticeable even over transatlantic calls, though the call quality can be as good as a call over a fiber-optic cable.

At the other end of the quality spectrum is a route using VoIP over the long-distance satellite link terminating in an ISP using a leaky PBX to terminate the calls.

VoIP packets contain a lot of signaling overhead: to carry the 64k of data packet a conventional telecoms network transmits needs around 100k of bandwidth with VoIP. VoIP achieves lower bandwidth by using data compression techniques on the voice part of the data packet and this reduces the call quality.

Q2. In case your response to the Q1 is in the negative, kindly provide an alternative definition along with a detailed justification.

Comments : **No Comments.**

Q3. Since the terms 'Inter circle traffic' and 'Intra circle traffic' are already defined in the telecommunication service license agreements, whether there is still a need to define the term 'domestic traffic' in the telecommunication service license agreements? If yes, what should be the definition of the term 'domestic traffic'? Kindly provide your response with a detailed justification.

Comments : **No.**

Domestic Traffic means that both the origination and terminal endpoints of the outbound and inbound traffics are within the country where the Internet Access is installed by the ISP.

Since there are only two components to domestic traffic – intra circle and inter circle and both have been defined under the unified license, there is no need for an explicit definition for domestic traffic.

Q4. Whether there are any other issues/ suggestions relevant to the subject? If yes, the same may kindly be furnished with proper justification.

Comments : **No.**

Thanks.

Yours faithfully,

(Dr. Kashyapnath)
President