

TRAI Consultation Paper no 10/2008 on Career Selection

Issues for consultation & Response from POWERGRID

Q1. Is there a case for implementation of carrier selection in today's environment?

Yes

Q2. Should carrier selected be implemented only in fixed, only in mobile or both.

Both FIXED and MOBILE

Q3. Should only call-by-call carrier selection (CS) or both CS and Carrier Pre-Selection (CPS) be implemented in the fixed and mobile networks?

Only Carrier Pre- Selection(CPS) should be implemented

Reason:

If only Call-by-Call Carrier Selection (CS) is implemented, then there may be billing problems as a subscriber will get different bills for different carrier selections. It may come out as a case that the billing cost for NLDO for a particular subscriber may exceed total bill amount from that subscriber. In case of CPS, even if the billing is done by NLDO for long distance calls, then maximum of two bills will be generated for each subscriber. Further, it would benefit all if the total billing is done by the UASL.

If both CS and CPS are implemented then too only CPS will be used in priority as calling with CPS is a lengthy procedure and further no one would like to memorize and dial extra NLDO codes.

Q4. In case both CS and CPS are implemented then in view of no major network changes in CS should it be implemented first? Give your

suggestions for a reasonable time frame of implementation of CS and CPS.

Access providers are in a better position to respond to this.

Q5. For what type of calls described in Chapter 1 section 3 should carrier selection be implemented?

R5. All given types of calls

Q6. In case of CS what should be the policy for default carrier considering the cost and benefits to the customer.

Default carrier should be selected by the subscriber based on least cost declared by the access provider.

For new subscriber:

The choice of NLD carrier can be asked at the time of applying for new connection. This can be made mandatory in each application form

For existing subscriber:

The choice of NLD carrier can be made by asking for a fresh application, may even by a telephone call, for STD and ISD calls only No balloting should be carried as it involve high cost & time and some subscribers may not participate in balloting.

Q7. If it is to be implemented in mobile network, should CS and CPS be implemented for both prepaid and post paid customers?

Yes, should be implemented for both pre-paid and postpaid subscribers
This can be done when total billing is done by the UASL

Q8. In what way should carrier selection be implemented for roaming customers?

This can be implemented if NLDO to NLDO transit is permitted

Q9. With reference to section 4 of Chapter 1, how do you think the customer should exercise the initial choice?

For new subscriber:

The choice of NLD carrier can be asked at the time of applying for new connection. This can be made mandatory in each application form

For existing subscriber:

The choice of NLD carrier can be made by asking for a fresh application, may even by a telephone call, for STD and ISD calls only
No balloting should be carried

Q10. With reference to section 5.4 of Chapter 1, in the event of implementation of carrier selection, what should be the procedure followed for activation of CS/CPS to avoid slamming?

This can be taken care by imposing penalty on each such attempt. UASL has to show chosen NLDO on the billing statement. In case the subscriber finds it other than what he opted for, then there shall be provision for complaint redressal.

Q11. What should be the mechanism for determination of up-gradation costs? Please suggest the cost recovery method in the present environment?

Upgradation cost on actual basis. Enabling cost should be borne by NLDOs. The NLDOs who are not providing voice services shall be exempted from bearing the cost of upgradation. If the cost is distributed then it shall be a percentage of revenue earned from voice services rather than equal distribution as this will affect small players/ new entrants.

Q15. Should access provider make arrangement for selection of the NLDO/ILDO who is not present in SDCA.

Yes

Q16. If the answer to Q 15 is yes then what arrangement do you propose for carriage of calls upto the point of presence of selected NLDO?

NLDO to NLDO transit

Q17. Should NLDO to NLDO interconnection/handover of traffic be mandated in the event of carrier selection being implemented?

Yes

Q18. In the event of implementation of carrier selection, would any change in the interconnection usage charge regime is required e.g. mandating origination charge, forbearance on carriage charge etc.?

Yes. This will help uniformity in billing and reconciliation.

Q19. Should there be any requirement to specify minimum criteria for NLDO/ILDOs, based on their coverage etc. to become eligible for selection as carrier. If yes, please provide detailed suggestions.

There should be no minimum criteria to provide a level playing field to all the NLDOs including smaller NLDOs such as POWERTEL and Railtel.

Q20. Should the license conditions of NLDOs/ILDOs be amended to allow them direct access to customers through calling cards for making national/international calls.

Yes. This will help avoid disputes with DoT and other operators.

Q21. Should NLDOs be allowed to sell calling cards only in those service areas where they have point of presence?

No. Such condition is not required once NLDO to NLDO transit is permitted.

Q22. Should NLDOs be allowed to sell calling cards only for national long distance and ILDOs for international long distance calls?

Yes, that may be opted but then the UASL shall provide only local call facility to subscribers. The UASL shall provide NLD/ILD facility to its subscribers through calling cards only. Otherwise no one would like to use a calling card for NLD/ILD calls, if the service is readily available

with the phone. If UASLs are allowed to provide NLD/ILD facility by default or by choice with the phone connection, then subscribers will use direct facility only instead of dialing extra calling card digits and this will give advantage to UASLs.

Q23. Should access providers be mandated to give connectivity to NLDO/ILDOs for accessing customers through calling cards

Yes . This is must if the real benefits have to reach the customers

Q24. Should NLDOs/ILDOs be allowed to market national/ international calling cards to promote competition in these segments to the benefit of the consumers?

Yes

Q25. Should there be restriction on making local calls using these cards in the service area for which they are sold?

Yes. This will protect the revenue to access providers. However NLD/ILD calls should be through these calling cards.

Q26. How should it be ensured that only permitted services are offered in the market?

TRAI can suggest impose penalties of each attempt of violation

Q27. Would this require any change in the interconnection regime?

Yes. In order to implement Carrier selection and issue of VCCs by NLDO who have not yet interconnected with other operators interconnection shall be the priority