



11th July 2023

Shri Akhilesh Kumar Trivedi
Advisor (Network, Spectrum & Licensing)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg, (Old Minto Road)
New Delhi – 110002

Subject: Consultation Paper on “Definition of International Traffic”.

Dear Sir,

This is in reference to the Consultation Paper dated 2nd May 2023 on “**Definition of International Traffic**”.

In this regard, we, Tata Teleservices Limited (TTSL) and Tata Teleservices (Maharashtra) Limited [together called “TTL”] hereby enclose our response to the questions raised in your above-mentioned Consultation Paper. We hope our response will be given due consideration.

Thanking you and assuring you of our best attention always.

Yours sincerely,

Satya Yadav
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And
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Encl: As above

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*Consultation Paper on “ Definition of International Traffic”
Comments by Tata Teleservices Limited & Tata Teleservices (Maharashtra) Limited*

At the outset, Tata Teleservices Limited and Tata Teleservices (Maharashtra) Limited [together called “TTL”] express our sincere gratitude to Telecom Regulatory Authority of India (TRAI) for releasing Consultation Paper on “**Definition of International Traffic**” and inviting TSPs comments for the same.

In this respect we, TTL, would like to submit our response to the issues and concerns as mentioned in the Consultation Paper is as follows:

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.

TTL Response: Yes, we agree with the same that, international long traffic may be defined as telecommunication service which originates from one country and terminates into another country through ILD gateway through a Licensed ILDO, where one of the countries in the process is India. In all other scenarios the traffic may be treated as domestic traffic.

Justification: This will help to regulate the grey market traffic bypassing the defined route and not paying the charges which is due for Government of India and respective TSP.

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

TTL Response: Nil

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.



TTL Response: We are of the opinion that since the domestic traffic is already defined as traffic originating and terminating within the boundaries of India, there is no need to further define the domestic traffic in the telecommunications service license agreements.

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

TTL Response: We TTL, would like to make the following suggestions :

1. All messages initiated by foreign entities operating in India like Amazon, Uber intending to target only Indian users using their services in India. Their messages which are initiated and terminated within Indian jurisdiction only should be treated as domestic traffic and not ILD basis the name of the Entity.
2. There must be provision to register such Entities which have operation within India and want to send messages to their customers through domestic route.
3. For all ILD related traffic a separate ILD GT should be defined to facilitate the reconciliation and settlement between operators.