



22nd March 2024

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

Subject: Consultation Paper on “Connectivity to Access Service VNOs from more than one NSO”.

Dear Sir,

This is in reference to the Consultation Paper issued by the Authority on 23rd February 2024 regarding “Connectivity to Access Service VNOs from more than one NSO”.

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 believe TTL response will be given due consideration.

Thanking you and assuring you of our best attention always.

Thanking you,

Yours sincerely

Satya Yadav
Addl. Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
For Tata Teleservices (Maharashtra) Limited

TATA TELESERVICES LIMITED

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*TRAI Consultation Paper on
"Connectivity to Access Service VNOs from more than one NSO"
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 the consultation paper on "**Connectivity to Access Service VNOs from more than one NSO**" for stake holders' comments.

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

Q1. In your view, what is the maximum number of Network Service Operators (NSOs) from whom a UL (VNO) licensee holding Access Service Authorization should be permitted to take connectivity in a licensed service area (LSA) for providing wireline access service? Kindly provide a detailed response with justification.

TTL Response:

We recommend that there should be only one network service operator (NSO) from whom a UL (VNO) licensee holding Access Service Authorization should be permitted to take connectivity in a licensed service area (LSA) for providing wireline access service. One NSO in a LSA can provide the best commercials to a UL (VNO) and support it to offer the best rates in the market.

Having multiple NSO's involved with distributed capacities would limit the VNO's ability to offer competitive services in the market to its customers.

Q2. In case your response to the Q1 is a number greater than one, what should be the associated terms and conditions for permitting such connectivity? Kindly provide a detailed response with justification.

TTL Response:

NA

Q3. Whether a UL(VNO) licensee holding Access Service Authorization in an LSA should be permitted to take connectivity from one NSO for wireless access service and other NSO(s) for wireline access service in the LSA? Kindly provide a detailed response with justification.

TTL Response:

Yes, VNO's should be permitted to take connectivity from one NSO for wireless access service and another NSO(s) for wireline access service in the LSA. Due to the same commercial reasons as covered in response to Question No # 1.



Q4. In case your response to the Q3 is in the affirmative, what should be the associated terms and conditions for permitting such connectivity? Kindly provide a detailed response with justification.

TTL Response:

NSO's offering wireline and wireless services are two individual entities that will also have minimal commercial conflicts, and VNO's can negotiate better for consolidated capacity for wireline or wireless separately.

We suggest that it is better to leave terms and conditions to be decided between NSO and UL (VNO).

Q5. Whether there are any other relevant issues or suggestions related to the parenting of licensees holding Access Service Authorization under UL (VNO)? Please provide a detailed response with justification.

TTL Response:

New VNO's have limited understanding of regulations and guidelines, and their expertise on lawful interference implementation is partial.

Hence, it is requested to have clearcut guidelines on do's and don'ts related to security conditions, legal interference implementation, media and signaling flow, customer acquisition, and KYC compliances.