



Telecom Regulatory Authority of India

Stakeholders Responses

on

Consultation Paper 10/2007

Dated 24th December, 2007

**Terms and Conditions for
Publication of an Integrated Telephone Directory for Fixed
Line Telephones
and
National Integrated Directory Enquiry Service (NIDQS) for
Fixed and Mobile Telephones**

Telecom Regulatory Authority of India

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Sl.no.	Stakeholder's name	Abv.
CAGs/Consumer Groups (15 Nos)		
1	Bharat Jyoti Consumer Advocacy Group, Lucknow	BJCAG
2	Citizen Consumer& Civic Action Group, Chennai	CCCAG
3	Consumer's Association Palakkad Kerala (PA Surendran) (PDCA)	PDCA
4	Consumer Care Society, Bangalore	CCS
5	Consumers' Forum, Sagar, Karnataka	CF
6	Consumer Guidance Society, Mumbai	CGS
7	Consumers' Protection Association, Agartala	CPA
8	Kerala Consumer Service Society (Dr. Balachandran)	KCSS
9	Consumer Protection AssociationJai Somnath, Gujarat (Dr. Niranjannath Upadhyaya)	CPAS
10	Consumer Unity and Trust Society, Jaipur	CUTS
11	Islampur Ramakrishnapally Rural Welfare Society, Uttar Dinajpur, West Bengal	IRRWS
12	National Centre for Human Settlement and Enviornment, Bhopal	NCHSEBPL
13	Orissa Consumers' Association, Cuttack	OCA
14	Upbhokta Sanrakchhan & Kalyan Samiti, Kanpur	USKS
15	Surya Foundation Ltd., New Delhi	Surya F
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Service Providers Associations (2 Nos)		
16	Association of Unified Telecom Service Providers of India	AUSPI
17	Cellular Operators Association of India	COAI
Service Providers (6 Nos)		
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19	BPL Mobile Communications Ltd.	BPL
20	Bharat Sanchar Nigam Ltd.	BSNL
21	Mahanagar Telephone Nigam Ltd.	MTNL
22	Reliance Communications Ltd.	Reliance
23	Tata Teleservices Ltd.	Tata
Others (6 Nos)		
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25	Infovision Group	
26	Infonxx	
27	Senthil M. & friends	Senthil M.
28	Kesavamoorthy K	
29	Official Telephone Directories and Yellow Pages Publishers Association	OYPPA

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RESPONSE OF STAKEHOLDERS ON ISSUES FOR CONSULTATION

I. Issues related to Printing of an Integrated Telephone Directory for Fixed Line Telephones, including new licence for directory publication:

6.1 (a) What are your views on the alternative proposal to authorize BSNL/MTNL and the National Integrated Directory Enquiry Service Provider to publish the integrated telephone directory SSA-wise for fixed line telephones in case they wish to undertake publication of Integrated Telephone Directory and the proposal to give preference to BSNL for such authorisation in case it is necessary to restrict authorisation to one party? Please give your views with reasons.

- (i) **Bharat Jyoti Consumer Advocacy Group:** In case BSNL/MTNL undertake to publish the integrated telephone directory for fixed lines, SSA-wise, they may be given preference. But the directory publication should not be restricted to BSNL/MTNL alone for the simple reason that there have been many cases of litigations against them in the past for directory publications, thus delaying the publication indefinitely sometimes. Moreover, there is a long delay by BSNL/MTNL in bringing out the directory due to inherent delay in receiving the correct data and methods adopted in selection and awarding of contracts for publishing the directory.

All the existing operators BSNL/MTNL including private operators having fixed telephone lines may have their own Directory Enquiry Service, but there should be a license system for NIDQS. The existing directory services of BSNL/MTNL are far from satisfactory. The NIDQS is likely to worsen if given to incumbent operator.

- (ii) **Citizen Consumer & Civic Action Group:** This being the first time that TRAI is planning to come out with an Integrated Telephone Directory, it would be better to seriously consider restricting authorization to one party. This may avoid unnecessary confusion in data collection and maintaining security. Though there may be a market demand and competition, it may be advisable to bring out the Integrated Telephone Directory under one authorized party initially and later consider expansion of the same since consumers are used to the telephone directory issued by a single party over the years and multiplicity of the same may lead to unwanted chaos. Moreover, with regard to the “opt out” facility, change in the numbers, etc. there is a possibility of the change being included in one and left in the others.

There is no need to give preference to BSNL, but it should be left open to market forces and competition.

- (iii) **Consumer's Association (PA Surendran):** Carefully prepared
(iv) **Consumer Care Society:** In case the government decides on giving preference to BSNL or MTNL for its own reasons, our views have no meaning

- at all. If there are no overriding reasons for such a decision, then in order to minimize litigations, prefer open tendering and follow normal commercial procedures to avoid controversies.
- (v) **Consumers' Forum:** we support the proposal to give BSNL the responsibility of publishing ITD. Because BSNL as well as MTNL are having experience and expertise in publishing such directories. And also being a Government owned Company, BSNL is more credible and trustworthy than any other private operators. More than everything else, these two companies are accountable for any commissions or omissions since they are Central PSUs.
 - (vi) **Consumer Guidance Society:** We earnestly feel that BSNL/MTNL and the National Integrated Directory Enquiry Service Provider should be authorized to publish the integrated telephone directory SSA wise for fixed line telephones in the light of their past experience and their preponderance share in the fixed line market. At the same time foolproof regulations should be formulated and enforced in order to ensure that vital information regarding the subscriber base, sources of such subscription etc., are not mis-used by such publisher in order gain an undue advantage and rig the rules of fair competition at the expense of other players in the fixed line market. Further, the publication of integrated telephone directory may be rotated among the service providers basing on sound parameters which include inter-alia tract record of the service provider in redressal of consumer grievances.
 - (vii) **Consumers' Protection Association:** There should be SSA wise Integrated Printed Directory and all SPs should share expenses. The Integrated Directory should be for both fixed and mobile phones.
 - (viii) **Dr. Balachandran (KCSS):** The alternative proposal to authorize BSNL to publish the ITD and the NIDQS is not at all welcome as this is an era of competition and we should avoid monopolistic and unfair trade practices. Only competition can build a bright India.
 - (ix) **Dr. Niranjannath (CPAS):** There is no harm in permitting incumbents, as they have experience in publishing the directory. Improvement is only at top not yet at bottom.
If a new Agency is permitted, after some time it will improve its performance. Incumbents will improve at lower level by competition. They have enjoyed monopoly.
 - (x) **Islampur Ramakrishnapally Rural Welfare Society:** To maintain the competitiveness there should be more than one authorize company to publish the Integrated telephone Directory, but BSNL/MTNL should be one of them as they have prior experience in such activities.
 - (xi) **Orissa Consumers' Association:** BSNL, being the major player having wide networking be given preference but publishing of directory should be ensured within a time frame.
 - (xii) **Ramesh Chandra-NCHSEBPL:** It is a good move to authorize BSNL/MTNL and the National Integrated Directory Enquiry Service Provider (NIDESP) to publish an integrated telephone directory Secondary Switching Area (SSA) wise for fixed line telephones. The authorization should not be

restricted to one party as it leads to monopoly with least chances of improvement.

- (xiii) **Surya Foundation:** National Integrated Directory Enquiry Service can be provided by BSNL. They have all-India presence. If however, the other service providers have any reservations in giving the data to BSNL, the matter would have to be resolved.
- (xiv) **Upbhokta Sanrakchhan & Kalyan Samiti:** According to our view that BSNL/MTNL and National Integrated Directory Enquiry Service Provider to published the integrated telephone Directory SSA –wise for fixed line telephone that above authority are Govt. authority and they are working in this field for a long time with well experience.
- (xv) **AUSPI:** There are around 40 million fixed line subscribers. The Printing of directories on precious paper in different languages for 321 SSAs across the country every three years would be a waste of national resource. There would be disastrous environmental effect also if all NIDQS operators start publishing directories as each one of them would try to maximize circulation. There are alternate means available through calls and web to make directory query and therefore need of publishing of fixed line directories may be re-considered.

However, as the issue has been raised by the Authority, we respond to these, but our concern as above should be taken seriously

The proposal that BSNL/MTNL and the National Integrated Directory Enquiry Service (NIDQS) Provider can be authorized to publish SSA wise **fixed** line telephone directory is agreeable if the above important issue is not accepted by TRAI.

- (xvi) **COAI:** BSNL and MTNL are ideally suited for publishing the integrated telephone directory SSA - wise for fixed line telephones because of their long standing experience in fixed line service.
- (xvii) **Bharti:** No comments.
- (xviii) **BPL:** We agree with the idea of entrusting the responsibility for the publication of Integrated Telephone Directory to BSNL/MTNL and the Integrated Directory Enquiry Service provider. Since about 90% of the fixed line phones pertain to BSNL/MTNL networks and they have also got considerable experience in bringing out printed telephone directories over a long period, they will be in the best position to print and distribute an Integrated Telephone Directory for fixed line phones pertaining to all net works.
- (xix) **BSNL:** As submitted already in our letter, BSNL opposes the proposal of printing of Telephone Directory containing fixed telephone numbers of all the operators. This is discriminatory, increases the cost of fixed line services and has many implementation issues which have been brought out in our letter. In case, Government still decides to go ahead with printing of the

telephone directory as proposed, it is suggested that this work may be entrusted to a third party through a bidding process.

(xx) **MTNL:** 1. MTNL has a license to provide access services in the service area of Delhi & Mumbai metro circles. As far as Metros are concerned, the utility of a full-fledged printed Directory is very limited, rather doubtful:

a) Due to increased subscriber churn – as compared to the days of DOT monopoly, when subscriber churn was unheard of - the frequency of publishing directories will have to be faster to remain relevant.

b) Presently, when the number of telephones is more than 25 crores, not more than 4 cr. subscribers are covered by published Directory/ DQ services. *If approx 85% telephone customers remain outside the purview of the Directory, this itself is an indication that the utility of Directory has tremendously gone down.* Unlike MTNL/ BSNL, private telcos are not even providing their fixed line directory on the net.

c) For majority of subscribers, mobile is a substitute for landline - due to extremely low density of landline, most of them use mobile because they do not have a landline. Even by conservative estimates, such mobile users who do not have any landline will not be less than, say, 10 crores – as compared to less than 5 crore landlines. These 10 crore mobile consumers are potential candidates, at par with fixed lines, for print directory. Hence, discrimination between landline and mobile users for printing directory is not meaningful in our context. And in view of fast burgeoning mobile nos., print directory will become irrelevant very fast.

d) Any person desiring to contact another person is interested in getting the telephone number of the other party irrespective of the contact number being fixed line or a mobile. Thus any artificial discrimination in accessing the information is redundant. Thus the information about telephone numbers of a subscriber should be comprehensive irrespective of fixed or mobile number.

e) With approx. 20 lacs fixed-line subscribers in each metro, the number of volumes required will be huge. (Say 20 lacs x 4 volumes each - every year). In metros like Delhi/ Mumbai, subscribers may not be interested to fill their costly cupboard space with thick volumes of directory – *that too at a price!* Not to mention the environmental costs involved because of the quantum of paper likely to be used.

f) Directories consume a lot of papers for which a large number of trees are cut down, causing environmental damage to our already depleting jungles. Hence, it is in the overall national interest also that directories are not printed to conserve environment.

g) There is direction from Government to change over to e-governance so that maximum use of IT can be done. MTNL is of the view that directory service should also be based on IT technologies in the larger interest of saving the resources. The information can be made available in electronic form on CD by the telecom service operator on a nominal charge.

h) One of the purposes of Directories in earlier times was to provide commercial information pages in the beginning. Integrated Directory of multiple operators may not serve that purpose, and in any case, the commercial information is now so dynamic and fast changing that it becomes irrelevant in no time.

i) MTNL has been an incumbent operator for the last two decades and earlier as DOT is fully aware of the complex issues involved in the printing of directories. Hence MTNL feels strongly that printing of directory SSA wise is uncalled for in large interest and is total wastage of natural resources.

2. Hence, the question of publication of paper directory requires a paradigm shift in our thinking. When we are aiming for a utopian 100% tele-density, printing of Directory is akin to printing of all household addresses in a city – that too every year. Even the District Administrations/ Law enforcement agencies do not print so much of paper information (of all addresses) for distribution to all households – even when their data is comparatively static! **In nutshell, is there really any need of print Directory in today's scenario?**

3. International experience of EU States and USA mentioned in the consultation paper is also revealing. *Though the wording in para 5.3 regarding the US experience has been reflected in such a way as to give a feeling that DA/ DQ services include print directory, it nowhere mentions about the print directory. It only mentions about Directory Assistance – which is probably on the web – since numbers of look-ups etc. have been given.*

4. Similarly, Annex 4 of Consultation Paper clearly indicates that the print directory is not mandatory in EU countries (Article 5 of Directives (not ACT) states that, 1. at least whether printed or electronic or both ...). The Consultation Paper does not give any example whether print directory is still in vogue in any EU country or Americas.

To conclude, before framing guidelines for print directory, the question that needs to be addressed first is 'whether there is any real requirement of print directory in today's scenario?'

However, the following might be considered useful:

(a) A directory of Government departments/ public utility numbers may be published every year. The scope of directory may include recognized institutions/ NGOs etc. Few blank pages in the directory may be provided for the individual subscriber to note down his own important numbers.

(b) Licenses may also be considered for publication of Yellow pages directory/ Advertisement based DQ services for trade and industry. Needless to say that such directory and DQ service will automatically be integrated across the spectrum of all telecom operators.

5. Meanwhile, the *Directory Enquiry on the net must be made mandatory for all the operators*. DOT/TRAI may provide a single page on their website with links to the directory of all telecom service providers to simplify the directory search. Right now, it is being provided only by

MTNL/ BSNL. This is an indication that the private telecom players are not keen on DQ services even for their own subscribers for reasons best known to them.

(xxi) **Reliance:**

- We do agree with the proposal that BSNL/MTNL and the national Integrated Directory Enquiry Service Provider can be authorised to publish SSA wise **fixed** line telephone directory.
- All **access providers or any company promoted by them should also be eligible to become NIDQS provider.**
- Integrated directory is not covered within the scope of existing license and therefore separate license/authorisation is needed by all access providers including BSNL/MTNL for publication of integrated directories.

(xxii) **TATA:**

- TTL agrees with the proposal that BSNL/MTNL and the National Integrated Directory Enquiry Service (NIDQS) Provider can be authorized to publish SSA wise **fixed** line telephone directory.
- Integrated directory is not covered under the existing scope of license/authorization and therefore separate license/authorization will be needed to print the integrated directory for Fixed line telephones at SSA Level.
- All existing access providers should be eligible to become NIDQS operators. The scope of NIDQS should include printing of fixed line directories at SSA level.

(xxiii) **Hari Infonet Ltd.:** The BSNL/MTNL should not be restricted to go for publishing but at the same time other agencies should be authorized because if we see the past track records of BSNL the obligation has not been fulfill by BSNL on time every year in all SSA. More over no of times it has been highlighted by no of media about the mistake left out by BSNL in compiling and typing mistake in no of Directories. Hence it is very much essential to have more than one authorized agency for printing and compiling of Directories even at SSA Level and separate agency should be their.

(xxiv) **OYPPA:** At the outset, we wish to reiterate the need to have an ITD of all the service providers for the land line. Considering the size and convenience of usage, the ITD should be SSA-wise. Moreover, from the users' point of view, most important thing is to have **all the telephone numbers in a single publication** since bulk of the calls are made within a district, the SSA-wise directory would serve the purpose.

The success of the project of publication of ITD is critically dependent upon two factors :

- (i) Systems established for collection of the data at single source, timely and accurately.
- (ii) The ability and willingness of the agency entrusted with the job of aggregating the database and printing and publishing the ITD

In this context and particularly going by the experience of the past 20 years i.e. since 1986 (when the DoT policy for publication of the directory involving private parties was operationalised), we wish to submit that there are several constraints faced by BSNL/MTNL internally as well as by virtue of their status as a PSU in executing the ITD job. We submit, with due respect to their capabilities, and within the constraints they face, they are not in a position to execute the job to the satisfaction of the consumer. As such, it is our humble submission that this project should be de-linked from BSNL/MTNL and the directory should be published by an independent, competent agency, equipped with necessary powers to collect the database from all the telecom service providers, in a timely manner. This would pave the way for success of the project and also make the consumers happy by providing them the ITD regularly on an annual basis.

6.1 (b) What are your views on the proposal to introduce new licence for publication of integrated telephone directory for fixed line telephones on licensed service area basis? Please give your views with reasons.

- (i) **Bharat Jyoti Consumer Advocacy Group:** We propose to introduce new license for publication of integrated telephone directory for fixed line telephones on licensed service area basis, as it should not be left alone to BSNL/MTNL, who may not be able to bring out the directory within the stipulated time.
- (ii) **Citizen Consumer & Civic Action Group:** The proposal to introduce new licence for publication of integrated telephone directory for fixed line telephones on licensed service area will be of immense benefit to consumers.
- (iii) **Consumer Care Society:** Let the publications be SSA wise. Advantage not all eggs in one basket and easier coordination.
- (iv) **Consumer Guidance Society:** We feel such license is not desirable in the interest of consumers as are of considered opinion that every fixed line subscriber should be assured of a right to get a free copy of telephone directory.
- (v) **Dr. Balachandran (KCSS):** Proposal to introduce new licensee too is not welcome. This shall be a commitment to the service provider to serve the consumer free of charge as a part of quality service.
- (vi) **Islampur Ramkrishnapally Rural Welfare Society:** Apart from BSNL/MTNL, license may be given to other reputed agencies for publication of an integrated telephone directory for fixed line telephones
- (vii) **Ramesh Chandra-NCHSEBPL:** It can be a good move provided the applicants for licence strictly adhered to the terms and conditions.
- (viii) **Upphokta Sanrakchhan & Kalyan Samiti:** This not necessary to give the another licence for publication of Integrated Telephone Directory because these authority having already licence and also experienced. We can amend the licence already issued to said authority for saving unnecessary licence fees.
- (ix) **AUSPI:** Integrated directory is not covered under the existing scope of license/authorization and therefore **separate license/authorization will be**

needed to print the integrated directory for Fixed line telephones at SSA Level.

All existing access providers or subsidiaries or companies promoted by access providers should be eligible to become **NIDQS** operators. The scope of NIDQS should include printing of fixed line directories at SSA level.

- (x) **COAI:** We are of the view that it is good to introduce competition for publishing of telephone directory for fixed line telephones. The licence could be granted on a Service Area basis and the directory could be published SSA wise.

However, we earnestly request the Hon'ble Authority that the Incumbent operator may be encouraged to share its experience as to whether in today's scenario, **it is relevant or not to go in for printing of a telephone directory as the printed directory is fast becoming obsolete.** It is also important to note that the desired information can also be made available online or through CDs etc..

Further, printing of a telephone directory consumes lot of paper and hence having a printed telephone directory **may not be an environment friendly proposition.**

- (xi) **Bharti:** No comments.
- (xii) **BPL:** For the sake of competition and to ensure that atleast some directory is available in the market, it will be better to license atleast 2 (maximum of 3) parties for bringing out the printed directory. This will provide safety cover against one of the authorised agencies not being able to timely bring out an updated version of the directory.
- (xiii) **BSNL:** Printing of Telephone Directories by a licensed entity is definitely a better option as, through such an entity, the Government can ensure better and timely implementation of the printing of telephone directories and also ensure security of data which will be a major concern for all operators.
- (xiv) **Reliance:** There are around 50 million fixed line subscribers. The Printing of voluminous directories on precious paper in different languages in each service area, every three year would be a waste of national resource. There would be disastrous environmental effect if all NIDQS operators start publishing directories as each one of them would try to maximize circulation. There are alternate means available through calls and web to make directory query and therefore need of publishing of fixed line directories may be re-considered.
- (xv) **Hari Infonet Ltd.:** It is not necessary to introduce license for printing of directories as many of the directories are available in the market at present in different format of information but to have a quality of data (of all network and all access provider) their should be authorized agency who can obtain data from all the access provider to maintain good quality of compilation and publishing, such authorization is to be provided to a person/company

who undertake responsibility to publish entire data of all access provider by all access provider. However to restrict more no of company all access provider can give such authorization to one person/company in each SSA

- (xvi) **OYPPA:** Introduction of licensing for publication of ITD for fixed land lines is essential and it has to be on the licensed service area basis i.e. Circle level. Today some successful publishers undertaking BSNL directory have not been able to make it a viable proposition and scale up and multiply partly because the licensing is on a SSA basis. If the publisher gets licenses at circle level, he will be in a position to optimally utilize his management bandwidth, physical resources and, more importantly, project a picture of confidence to the consumer in the other circle. Fragmented presence in different circles will not be helpful to any agency. Another reason is that since the license for basic services and mobile services are on a circle-wise basis, even the ITD license should follow the same. There would be better coordination between the ITD publisher and different telecom licensees. Going forward, circle-wise license would pave the way for achieving the economies of scale, project a good brand image, optimize on the utilization of scarce fiscal and manpower resources and help in proper brand building. Thus, we strongly support your views of having the ITD license on licensed service area basis. As regards the NIDQS, it should follow the same sequence of circle-wise with an option to each of the service provider (Teleco) to have an independent enquiry service **in addition to NIDQS**.

6.2 What should be the optimum number of licensees (including authorizations) for publication of telephone directory for fixed line telephones, keeping in view the size, market demand and competition for printed telephone directory, data sharing requirements and competition? Please comment with reasons.

- (i) **Bharat Jyoti Consumer Advocacy Group:** In our opinion, there should be there should be three licensees including BSNL/MTNL in each of the four regions i.e. North, South, West, East. This is necessary to bring competition for printing directory. There are already nearly 40 millions fixed line customers. If we assume equal distribution, here may be 10 million fixed line subscribers in each region. This will give enough margin to the selected parties.
- (ii) **Citizen Consumer & Civic Action Group:** The question of optimum number of licensees does not arise when authorization is being given to one party.
- (iii) **Consumer's Association (Mr. P.A. Surendran):** national level 5 and SSA level by 3 .
- (iv) **Consumer Care Society:** Not more than two is fine. Too many does not serve any give advantage.
- (v) **Consumers' Forum:** In our opinion, apart from incumbent operators, others also should be given license. Fair competition has to be the criteria for deciding licenses.
- (vi) **Consumer Guidance Society:** We are not inclined to the very idea of introducing licensing system for the publication of telephone directory.

- (vii) **Consumer Unity and Trust Society:** Given the economies of scales in the publication and Printing of National Integrated Directory, it is desirable to have a single licensee. Since the sound regulation (though TRAI) is in place, the supplier will not be able to exploit the consumers. However, at the later stage, if desirable, TRAI may allow one or two companies to publish the National Integrated Telephone Directory.
- (viii) **Dr. Niranjannath (CPAS):** as many other required as per their market share. S Ps are now fast expanding there Subscriber Base.
- (ix) **Islampur Ramkrishnapally Rural Welfare Society:** Number of Directory Publishers should not exceed more than three and there should be a competitive environment among the directory publishers regarding the price and quality. There should be strict provisions for selling of License, merging or acquisition with the third party (Company) by the Licensee
- (x) **Orissa Consumers' Association:** It should not be more than five per area because high number will be chaotic and confusing.
- (xi) **Ramesh Chandra-NCHSEBPL:** As mentioned in the note, the maximum number of licensees should not be more than three including BSNL and MTNL.
- (xii) **Uphokta Sanrakchhan & Kalyan Samiti:** Directory Enquiry Service is basically a public utility service. Therefore licence should be given only 3 or 4 authority who quote minimum price and better quality of Directory provided to public/subscribers.
- (xiii) **AUSPI:** To begin with a total of four access providers including a PSU access provider / or their subsidiaries or companies promoted by them be permitted to provide NIDQS who should be authorized for publication of telephone directory for fixed lines.
- Initially only existing access providers or their subsidiaries or companies promoted by them should be eligible to become NIDQS operators.
- (xiv) **COAI:** The optimum number of licensees (including authorizations) for publication of telephone directory for fixed line telephones could be left to market forces.
- (xv) **Bharti:** No comments.
- (xvi) **BPL:** Since the printed directory will be priced and not distributed free to all the subscribers (unlike the practice followed so far by DoT/BSNL/MTNL), there may not be too much demand particularly in remote and predominantly rural SSAs, for printed directory. In our opinion 2 (or maximum 3 players) would be the optimum number for printing the Integrated Directories.
- (xvii) **BSNL:** In case, it is to be selected through the bidding process, there may be one entity for each SSA.
- (xviii) **Reliance:**

- Initially only access providers and companies promoted by them should be eligible to become NIDQS operators
 - Initially the number of NIDQS may be restricted to 4 including BSNL/MTNL
 - Subsequently more operators could be allowed in case NIDQS market is not sufficiently competitive.
- (xix) **TATA:** Initially only existing access providers or their subsidiaries or companies promoted by them should be eligible to become NIDQS operators. TTL believes that a consortium of access providers including a PSU access provider / or their subsidiaries or companies promoted by them be permitted to provide NIDQS.
- (xx) **Hari Infonet Ltd.:** Since each access provider is authorizing one person/company there is enough no of agency /company will be their to print integrated directories to maintain size, market, demand and data sharing requirements with competition.
- (xxi) **OYPPA:** The optimum number of licensees for publication of TD has to be determined keeping in mind :
- (a) The size of the circle and number of districts (SSAs)
 - (b) The literacy level and awareness of the directory and usage
 - (c) The size of the database
 - (d) Market potential for the directory and yellow pages
 - (e) The past track record of the proposed licensee
 - (f) Average revenue per landline.
 - (g) Economic development of the circle.

Keeping all the above factors in mind, we suggest that you should have two licensees in metro cities of Mumbai, Delhi, Kolkata and Chennai and in the rest of the country there should be only one licensee per circle. This would obviously mean that there has to be a separate mechanism for selection of licensees for metros and the circles covering the non-metros as well.

The prime reason for the suggestion is – high market potential and larger coverage area with high density of businesses in the metros and relatively lesser level in the non-metros. Multiple licensees in the non-metros in the initial period would lead to confusion in the market. In the process, there would be risks of failures as it happened between 1980s and 90s even when there was a single publisher in each of the districts. After maturity of the market, say after 5 to 10years, competition can be introduced in the district level also and the number of publishers of ITD for metros can also be increased to three.

6.3 What eligibility criteria, including technical capability/ experience net-worth and maximum limit of total foreign equity to be maintained at any time, should be specified for the new licensee for publication of telephone directory for fixed line telephones?

- (i) **Bharat Jyoti Consumer Advocacy Group:** The eligibility criteria for awarding new license for publication of fixed line telephone directory could be (i) minimum experience of publishing directories of three large SSAs with a subscriber base of one hundred thousand or more (ii) Networth of 50 crores rupees or more. (iii) maximum foreign equity 74%.
- (ii) **Citizen Consumer & Civic Action Group:** TRAI may decide the eligibility criteria, etc.
- (iii) **Consumer's Association (PA Surendran):** Three years technical experience at minimum.
- (iv) **Consumer Care Society:** These are commercial aspects and each tenderer may have his own business plans. No views.
- (v) **Consumers' Forum:** Eligibility criteria as envisaged in consultation paper should suffice for all practical purposes.
- (vi) **Consumer Guidance Society:** No comment in the light of the position taken by us against the introduction of license system for the publication of telephone directory.
- (vii) **Dr. Niranjannath (CPAS):** Let it be determined by DoT & TRAI.
- (viii) **Islampur Ramkrishnapally Rural Welfare Society:** The applicant company should be a registered under Indian Companies Act, 1956. Financial status should be good and a reputed one. An experience in this field is desirable. Up to 49% FDI may be allowed.
- (ix) **Orissa Consumers' Association:** Eligibility criteria should be specified in detail.
- (x) **Ramesh Chandra-NCHSEBPL:** Technical capability should have the most important criteria for selection.
- (xi) **Upbhokta Sanrakchhan & Kalyan Samiti:** BSNL/MTNL & ITD are familiar to our country and area thereof and can understand easily problem of their religions relating to their requirement & taste. Therefore it is not necessary to give the license to any foreign Company.
- (xii) **AUSPI:** A net worth of Rs 1 crore may be prescribed for NIDQS operator. This would be inline with the net worth of Rs 2.5 crores prescribed for an NLDO.
- (xiii) **COAI:** No comments.
- (xiv) **Bharti:** No comments.
- (xv) **BPL:**
- (xvi) Parties who have the experience of bringing out printed versions of yellow pages and/or other printed directories of reasonable size should be preferred for licensing them for bringing out printed Integrated Telephone Directory.

There should be no limit on total foreign equity to be maintained at any Time as there are no security issues involved. The minimum networth may

be decided based on the cost involved of bringing out printed directories for a particular service area. In our view a minimum networth of Rs. 10 crores for Metro and "A" category circles, Rs. 5 crores for "B" category circles and Rs. 2 crores for "C" category circles should be good enough.

- (xvii) **BSNL:** The bidding company should have at least 10 years of experience in printing of directories. The net-worth and other financial requirements will depend upon whether it is authorized to print directory for the SSA or for the entire service area. As the company will have access to personal information of all the customers, the foreign equity at no point of time should be allowed to exceed 49%.
- (xviii) **Reliance:** Initially only access providers and companies promoted by access providers should be eligible to become NIDQS operator.
- (xix) **TATA:** A net worth of Rs 1 crore may be prescribed for NIDQS operator. This would be inline with the net worth of Rs 2.5 crores prescribed for an NLDO.
- (xx) **Hari Infonet Ltd.:** In my view 100% equity owned by Indian company should only be given such authorization, which will help in saving of foreign exchange and can generate more no of employment. As to print a quality directories infrastructure require is a good quality offset machine which is available widely with Indian companies. On the contrary I suggest that no authorization should be given to the company who have more than 10% as an foreign equity.
- (xxi) **OYPPA:** The success of this project is dependent upon the selection of the right agency / organization which has proven performance track record, necessary domain knowledge and expertise, willingness to invest to build the market and access to funds and technology. The prospective licensee should have published Telephone Directories on a continuous basis for at least five years successfully in his name for a comparable area in size of database. New comers, particularly those who have bad track record should be barred from participating in larger circles. They should be required to first demonstrate capability and actual delivery / performance for smaller circles and then be allowed to participate in future licenses of larger circles.

This is a very important criterion, which unfortunately was not taken care of in the framing of DoT policy dated June 1986. This was the prime cause of not only the failure of the directory publication in hundreds of SSAs, but also resulted in a big setback to the otherwise potential concept of publication of Telephone Directory with Yellow Pages. There should be absolutely no relaxation on this count and only companies with proven track record have to be entertained.

FDI : Going by the policy of Government of India in attracting FDI and considering the fact that Telephone Directory is a non-news publication, there need not be any restriction in terms of foreign equity holding in the company engaged in publishing ITD. In fact, successful ITD publishing

companies from countries like US and Europe should be encouraged to collaborate with Indian publishers by providing fiscal incentives to make the concept successful and be of service to customer who is today deprived of information provided in a cohesive manner i.e. ITD.

6.4 What selection criteria should be adopted for selection of licensee for directory printing? Please give your suggestions with reasons.

- (i) **Bharat Jyoti Consumer Advocacy Group:** It should be by bidding process, which is transparent.
- (ii) **Citizen Consumer & Civic Action Group:** TRAI may decide selection criteria
- (iii) **Consumer's Association (PA Surendran):** Through sealed tender process only
- (iv) **Consumer Care Society:** Party with previous successfully well done job preferred, even with a marginal higher cost.
- (v) **Consumers' Forum:** Technical expertise and capabilities to serve the consumers must be criteria for selecting the licensees.
- (vi) **Consumer Unity and Trust Society:** The licence should be issued through Competitive bidding process. Given the scope for marketing and advertisements in the printed directory, the allocation of licensee through auction is a desirable option. It will reflect the market fee of the licence.
- (vii) **Dr. Niranjannath (CPAS):** As above in 6.1.
- (viii) **Islampur Ramkrishnapally Rural Welfare Society:** Competitive selection based on a quantitative criterion such as an auction where the highest bidder is awarded the license. In case of more than one license is to be issued in a licensed service area, the second or the next highest bidder(s) can be asked to match the highest bid. This approach is transparent and not time consuming.
- (ix) **Ramesh Chandra-NCHSEBPL:** Instead of highest bidder criteria, one should follow comparative evaluation criteria and try to make it transparent. With this approach, more technically competent agency can be found out. So far as the entry fee is concerned, this can be done in the method of selection of licensee. The system of highest bidder some time comes under criticism.
- (x) **Upbhokta Sanrakshhan & Kalyan Samiti:** Selection criteria for publication, Publisher can provide cheap rate with clear printing and quality of papers should be better.
- (xi) **AUSPI:** Bare minimum entry fee may be prescribed for NIDQS operator. In case there are more than 4 interested parties, the auction may be carried out for selecting NIDQS operator.
- (xii) **COAI:** No comments.
- (xiii) **Bharti:** No comments.

- (xiv) **BPL:** The selection should be based on open bidding for the one time entry fee subject to meeting the laid down eligibility criteria like minimum networth, past experience etc.
- (xv) **BSNL:** Selection through bidding is the most transparent process and, therefore, should be adopted in this case also.
- (xvi) **Reliance:**
- Initially there can be four NIDQS operators.
 - The selection should be on the basis of auctioning.
 - In case other operators are allowed to enter the NIDQS market then they should be asked to pay the same entry fee paid by access providers
- (xvii) **TATA:** Low entry fee may be prescribed for NIDQS operator. In case there are more than 3 interested parties, the auction may be carried out for selecting NIDQS operator.
- (xviii) **Hari Infonet Ltd.:** In case of selection of licensee for printing following criteria is to be consider.
- Rates for no of copies.
 - Quality of paper
 - Technology used for compilation of data
 - Technology used for printing of directories.
 - Format of proposed directory
 - ISO standard of compilation and printing both
- (xix) **OYPPA:** The criteria specified for selection of a licensee for directory printing would facilitate the selection of a licensee, who has the required domain knowledge and proven track record of publishing the directory. As per the current guidelines of DoT/BSNL, the licensee should possess the following :
- a) Organizational capabilities
 - b) Infrastructure
 - c) Experience in the field
 - d) Future projection of business
 - e) Financial status

These conditions which form a technical evaluation procedure should continue and should be introduced for new comers to enable them to enter the industry and at the same time not risk placing important circles in the hands of new comers who do not have experience. Therefore, a company without the minimum track record of three years either by itself or through its collaborators in the field of publishing the directory, should be first required to participate in the tender for a smaller circle, demonstrate its capability and after continuous publication of minimum three years, they

should be permitted to participate in tenders of larger circles / metros. This way it would ensure people with holistic approach to database management, advertisement collection and printing enter the industry. If you have noticed, many bidders in the tenders floated by BSNL were pure play printers who did not have the other two qualifications, which is a must.

6.5 What should be the entry fee /the base price and licence fee applicable for the new licensee for publication of telephone directory for fixed line telephones? Please substantiate your response with reasons.

- (i) **Bharat Jyoti Consumer Advocacy Group:** No comments.
- (ii) **Citizen Consumer & Civic Action Group:** TRAI may decide the entry fee and the license fee.
- (iii) **Consumer's Association (Mr. P.A. Surendran):** Entrée fee depends upon the , healthy existing practice available in India.
- (iv) **Consumer Care Society:** No comments. TRAI may decide the entry fee and the license fee.
- (v) **Consumers' Forum:** Entry fee and license fee must be above 10% of the revenue share.
- (vi) **Consumers' Protection Association:** If the service providers join hands for this work there should not be any license or license fee.
- (vii) **Dr. Niranjannath (CPAS):** Let it be determined by DoT & TRAI.
- (viii) **Islampur Ramkrishnapally Rural Welfare Society:** The actual entry fee may be determined in the process of selection but the minimum reserve price need to be sufficient different category of licensed service area such as metro category A,B,C circles so as to discourage non-serious players.
- (ix) **Orissa Consumers' Association:** Should be determined through bidding to encourage competition. No entry fees for BSNL/MTNL.
- (x) **Ramesh Chandra-NCHSEBPL:** To discourage non-serious and incompetent party(s) it is necessary that entry fee should be on the higher side. This can be 10% to 15% of the estimated project cost. The licence fee can vary for different service area.
- (xi) **Uphokta Sanrakchhan & Kalyan Samiti:** Entry fees shall be determined through 50% of cost of publication to outsider publication (Except BSNL/MTNL/NIDES). And 25% of their entry fees should be refundable in the shape of reward for fare publication. So that, license should perform their duty accordingly.
- (xii) **AUSPI:** In case of auction, the entry fee shall be the auctioned amount. In case there is no auction, then base amount will be the entry fee.
- (xiii) **COAI:** No comments.
- (xiv) **Bharti:** No comments.
- (xv) **BPL:** The entry fee should be determined based on open bidding. The license fee of 10% of gross revenue should be levied as there is considerable potential of revenue generation due to printing of yellow pages, classified groups and additional advertisements.

- (xvi) **BSNL:** The entry fee may be decided through the bidding process because it is most transparent. The bidders only know their business model and can quote the entry fee accordingly. The license fee, if at all it is to be prescribed, may be nominal of the order of about 0.5% of AGR.
- (xvii) **Reliance:**
- A entry fee can be decided on the basis of auctioning.
 - Publication of telephone directories may be issued under authorisation and such operators be considered as 'Other Service Providers' and therefore **no annual license fee should be payable.**
- (xviii) **TATA:** In case of auction, the entry fee shall be the auctioned amount. In case there is no auction, then base amount will be the entry fee.
- (xix) **Hari Infonet Ltd.:** As mentioned above there should not be the entry fee / the base price and license fee for publication of telephone directory as many small firms are publishing directories presently in different format (association book, trade journals, Yellow pages etc) which is not only giving revenue to such firms but also help business man to develop their markets in their own area of interest for e.g. A manufacturer of food processing machine may not be interested in advertising in yellow page but ready to advertise in food processing associations directory as his market is within that area. Hence our aim of publishing of common integrated directories with yellow page is not viable and as a matter of fact it has been found in **Tata press case V/s MTNL** in the past. An Integrated directories in print form should be restricted to only white pages in order to maintain good data. The directories with yellow pages will bring in more burden on publisher so it should be optional.
- (xx) **OYPPA:** Entry Fee / License Fee : One of the reasons for the failure of the June 1986 DoT policy on TDYP publication, is the selection of the contractor purely on the basis of financial bids. Publishers expecting huge revenues and profits made irrational bids to bag the license at **any cost**, tried to generate the revenues as per their projections, failed totally in the market place, resorted to shortcut methods to publish directories and after suffering losses, wound up the operations without delivering the directories. **This shook the market confidence and also killed the otherwise promising concept at the inception stage itself.** It is our submission to this august Authority that the same mistakes should not be repeated. While minimal entry fee / base price can be prescribed to deter non serious players, emphasis should be more on performance and thus performance guarantees of higher magnitude can be demanded. This will automatically eliminate non-competent and non-serious players, ensure comfort to serious players to build the operations in states and pave the way for increased revenue over a period of time. The license fee could be based on share of revenue generated – both from sale of directories to the public as well as from the advertisements. To promote the orderly growth of the industry in the first six years, the revenue share could be in the percentage as specified below :

Year	Revenue Share
1	1 %
2	3%
3	4%
4 to 7	5%
8 to 10	7%

6.6 What are your views on the proposal for Data Sharing and Data Security as given in paras 2.4.8? Any other suggestions / additional points, if any, with reasons thereof.

- (i) **Bharat Jyoti Consumer Advocacy Group:** We agree with the views expressed in paras 2.4.8, which are good enough.
- (ii) **Citizen Consumer & Civic Action Group:** With regard to the matter of data sharing and data security, it is imperative that secrecy and confidentiality of data is maintained. Licensee should practice data protection measures as per international standards. No data must be passed on to a third party at any point of time by the authorised party. TRAI must outline stringent measures to ensure this confidentiality. It is also important to include the clause of cancellation of license in case of default, to make the licensee accountable.
- (iii) **Consumer's Association (Mr. P.A. Surendran):** Acceptable.
- (iv) **Consumer Care Society:** No comments.
- (v) **Consumer Guidance Society:** Data sharing and data security should be strictly enforced and at the same time the service provider undertaking the task of publishing the integrated telephone directory should not be allowed such vital data for increasing its market share and any deviation in this regard should be seriously frowned upon and slapped with deterrent penalty. Further, such penalty should be ten times more than the monetary advantage gained by such abuse of data security.
- (vi) **Consumers' Forum:** Proposals contained in consultation paper are enough.
- (vii) **Consumer Unity and Trust Society:** Presently Do Not Call (DNC) Registry is not working effectively. Consumers are getting unwanted call as usual. The implementation of the DNC facility should be ensured so that telemarketers may not misuse the information available in the directory.
- (viii) **Dr. Niranjannath (CPAS):** Excluding names is against the Right to Information Hiding Numbers is against Transparency.
- (ix) **Islampur Ramkrishnapally Rural Welfare Society:** Data sharing and data security may be as depicted in Paras 2.4.8 in the consultation paper
- (x) **Orissa Consumers' Association:** As given in Para 2.4.8.
- (xi) **Ramesh Chandra-NCHSEBPL:** The proposals for data sharing and data security mentioned in paras 2-4-8 are O.K. But in case of data security, some penalty or fine should be there on licensee for passing out information to third party or misuse of data.

- (xii) **Upbhokta Sanrakchhan & Kalyan Samiti:** Fixed line customer will have the facility to opt out of the directory services i.e. their names from the directory services, in case they wish to do so this facility should be implemented through internet and allotted a separate ID. Such types of number should not mention on directory, it should be circulate only on internet and there should be option that a person can read of details of subscribers with help of ID. With the help only familiar person shall be get the details of subscribers.
- (xiii) **AUSPI:** We agree with the proposal on Data Sharing and Data Security. There should be a stringent penalty clause to penalize defaulting authorized agency for violation of the data security measures. There must be an independent bi-annual audit conducted to verify adequacy of their data security measures.
- (xiv) **COAI:** As the Hon'ble Authority is well aware, **in today's scenario one of the biggest challenge before the telecom Industry is to protect the individual's privacy. The Hon'ble Authority would also appreciate that as far as the privacy issue is concerned, no distinction can be maintained between the fixed line services and mobile services as both are telecommunications services.** Thus, for fixed line services as well, the approach of "opt-in" should be adopted so that the privacy issues of the fixed line subscribers can also be addressed in an effective manner.
- (xv) **Bharti:** The Hon'ble Authority would agree that in today's telecommunications world, the most challenging aspect is to ensure that the privacy and security of an individual is not compromised due to accessibility of his / her personal details in public domain. While, undoubtedly, these issues have relatively more significance and implications in mobile services as mobile service is of more a person-to-person communication unlike fixed line services, however, the consequence of an individual's security and privacy cannot be undermined, who is using fixed line services.

Under these circumstances, it would be appropriate that for fixed line services also, the approach of "**Opt-In**" is adopted as it will allow the operators to publish the details of only those individuals / parties, who have given their explicit consent to place their numbers and other details in public domain and is well-aware about any consequence arising from the same. Undoubtedly, this approach will address the security and privacy concerns of an individual, having fixed line services, in the most appropriate manner.

Thus, we request the Hon'ble Authority that for fixed line services, the approach of "Opt-In" should be considered. Once all the operators have the data of those subscribers, who have chosen "Opt-In" approach, the concerned operator may publish such data in its website.

- (xvi) **BPL:** With the advent of telemarketing in recent years the problem of unsolicited commercial calls being received by both fixed line and mobile subscribers have resulted in lot of harassment and nuisance for the

telephone subscribers. While the harassment is more acute in the case of mobile subscribers, such calls are equally annoying for individuals having fixed line phones, particularly the residential phones. We are, therefore, of the opinion that “opt in” approach should be followed even for fixed line phones for bringing out Integrated Telephone Directory as well as National Integrated Directory Enquiry Service. When printed version of an Integrated Directory for fixed line phones is published it will be impossible to have any data security for such phones. We agree to the suggestions in para 2.4.8 of the consultation paper with regard to data sharing by fixed line service providers with the agencies authorised to bring out printed directories.

- (xvii) **BSNL:** BSNL has the option to inform its customers only through telephone bills or through a public notice. The period of one month, therefore, is too short for the customer to respond. Further, this data is subject to misuse by the telemarketers. BSNL is, therefore, of the view that instead of '**opt out**' approach, an '**opt for**' approach may be followed i.e. the names of only those customers, who specifically opt for the same, should be included in the telephone directory to be printed by the authorized agencies / licensees.
- (xviii) **Reliance:** We are in agreement with the views expressed by the Authority in para 2.4.8.
- (xix) **TATA:** TTL agrees to the proposal and would like to add that there should be stringent penalty clauses to penalize defaulting authorized agency for violation of the data security measures. There must be an independent bi-annual audit conducted to verify adequacy of their data security measures.
- (xx) **Hari Infonet Ltd.:** DQ data is not a religious data as per opinion I have got from personal discussion with no of senior BSNL officers in the past hence there should not be any kind of restriction / constrain in handing over the same to publisher. How ever the underwriting is to be taken for not doing any changes in the data.
- (xxi) **OYPPA:** The system prescribed by your office in para 2.4.8 with regard to options given / to be given to the customers in the matter of entry of their name in the ITD is most appropriate. Though the application form of BSNL/MTNL has a provision to specify the type of connection and the name in which the entry should appear in the directory, this is hardly insisted upon or even if the customer has filled the column diligently, it is rarely taken note of by the telecom company. The column should be made prominent, the customer, at the time of filling up the application, should be educated and the data thus collected should be made **online** to be available to the ITD publishers in real time. This will enable the ITD publisher to constantly update the entries and **be ready** to publish the directory at any point of time.

These measures, in addition to facilitating ITD publication, would also help in **ensuring genuineness of the record of telephone connections**. This would also act as a counter check for the subsidies claimed by some of the telecom operators (out of USO fund) for providing telephone in the semi-urban / rural areas.

In fact, the system of online transmission of the data of connections / disconnections / change of names, etc, is very successfully working in companies like Telecom Italia, Seat Pagine, etc. This would also facilitate online directory display and this addresses the major grievance of accessibility of validated data by a consumer, in the intervening period of two main directory publications.

6.7 What should be the duration of license? Please give reasons.

- (i) **Bharat Jyoti Consumer Advocacy Group:** It could be 6 years with sufficient safeguards, since the licensee has to bring out the main publication only once in 3 years.
- (ii) **Citizen Consumer & Civic Action Group:** Duration of license should be at least for a period of ten years in order to make it commercially viable for the licensee.
- (iii) **Consumer's Association (PA Surendran):** 3 years.
- (iv) **Consumer Care Society:** Three years reasonable.
- (v) **Consumers' Forum:** We are of the view that the duration of license should be as that of duration of the printing of directory i.e. two years.
- (vi) **Dr. Niranjannath (CPAS):** 3 years minimum, as supplements are to be provided for 3 years.
- (vii) **Islampur Ramkrishnapally Rural Welfare Society:** Duration of License may be for 3 years and thereafter with renewal for next 3 years depending on the compliance on the terms & conditions of license agreement.
- (viii) **Orissa Consumers' Association:** 10 years.
- (ix) **Ramesh Chandra-NCHSEBPL:** The maximum duration of license should not be more than three years, which can be renewed for a maximum of 2 years. So long the period is short the licensee can provide best services.
- (x) **Upbhokta Sanrakchhan & Kalyan Samiti:** The duration of licence should be at least 5 or 10 years and it should be renewed periodically and having guidelines under which publisher shall be bound. In case of any contravention of guidelines the security money should be forfeited by Govt. In consideration about 'period of licence' it is our opinion that it is long term project therefore it may be 5 or 10 years.
- (xi) **AUSPI:** For business to be viable, duration of license should be at least 10 year.
- (xii) **COAI:** We would like to submit that, so as to make the publication of Telephone Directory a viable business, the license period should be 10 years and the same could be extended thereafter for another years.

- (xiii) **Bharti:** No comments.
- (xiv) **BPL:** In our opinion the parties should be licensed to bring out 3 main issues of the directory at 3 years intervals i.e. the license should be for an initial period of 9 years. The license period could be further enhanced on the basis of fresh entry fee which could be decided either based on open bids or any other suitable method as decided by the authority.
- (xv) **BSNL:** The optimum duration of the licence should be 3 years so that sufficient time is given to the entity to perform and the period can be extended for further 3 years based on the performance.
- (xvi) **Reliance:** The period of license should be at least 10 years so that directory business is viable.
- (xvii) **TATA:** For business to be viable, duration of license should be at least 10 year.
- (xviii) **Hari Infonet Ltd.:** In case of license it should not be for the period more than 3 yrs. Reasons are as follows
- To keep the competition level high
 - To maintain the standard
 - To give the fair opportunity of earning to different companies from time to time to avoid monopoly
- (xxv) **OYPPA:** Duration : This is a very important aspect to be addressed from two angles :
- a. Economic viability of the project vis-à-vis investments expected
 - b. Consistent improvement in the service to the consumer

The success of the scheme of directory publication through private operators or even for that matter BSNL / MTNL, if they choose to do so, depends on the economic viability of the project in the long run and ability to recover bulk of the capital investment and recurring cost of directory publication through advertisement revenue and through the sale of directories (if the pricing mechanism succeeds). Similar logic was applied and telecom licenses granted for 10 – 15 years tenure. TD project also stands on the same plank and thus, in order to attract serious players with long term interests, give them an elbow room for understanding the market requirements and go on to build a firm base of revenue step by step, it is essential to have the license for a minimum of 10 years and preferably 15 years.

The present practice of short term license of 3 to 5 years has proved to be counter productive and in most of the cases has resulted in the licensee taking a short term view of the project. In this case, the licensee would only aim at **somehow** making the project viable and profitable in the short term, which is inherently a risky proposition. Thus he cuts corners, does not take long term view and make appropriate investments but would look at the

project with a very short term perspective being unsure of his continuation after the licensed period expires.

There are several instances in Indian telephone directory market operated by BSNL in the past, wherein after the previous player has exited losing in financial bid (due to narrow financial bid difference), the new comer has undone the developmental activities of the previous player and thus depreciated the market.

We reiterate, at the cost of repetition, it is therefore essential to have license, of course, with adequate performance guarantees, for a longer tenure and the minimum period should be 10 years.

6.8 What are your views on pricing of telephone directory?

- (i) **Bharat Jyoti Consumer Advocacy Group:** It could be priced at Rs. 50/- ,100/-,200/-in SSAs less than 1 lac subs.,SSAs more than 1 lac subs. and metros respectively.
- (ii) **Citizen Consumer& Civic Action Group:** With respect to the pricing of the Integrated Telephone Directory, since it is a public utility service, the directory may be given free of cost to enable easy accessibility to the end consumer. However, for the electronic format of the directory, a reasonable price may be fixed by the authorised agency after getting a prior approval from TRAI.
- (iii) **Consumer's Association(PA Surendran):** Nominal charge . Can be compared with Railway time table
- (iv) **Consumer Care Society:** One copy CD or Printed free for each subscriber. Extra copies prized reasonably.
- (v) **Consumer Guidance Society:** Telephone subscribers should have a right to get it free of cost. Free and unhindered access to telephone directory is indispensable to every subscriber for utilizing the telephone services provided by the service provider and therefore, it should be available to every subscriber without any price. However, a subscriber asking for a second and subsequent copy within the period of its validity may be denied such right and facility. In cases like that, price may be charged.
- (vi) **Consumer Unity and Trust Society:**The price for Directory should be subject of regulation or reflected from competitive bids. If the licensee is allowed to charge the price at their discretion, they may exploit the consumers. Further the price should be based on the scope of Directory. The licensee should be required to specify the Price for National Directory, State Directory and District/Circles (two three districts) separately.
- (vii) **Consumers' Forum:** Consumers must not be priced both for hard copy and enquiry services.
- (viii) **Dr. Balachandran (KCSS):** Pricing of telephone directory is anti consumer and amounts to exploitation.
- (ix) **Dr. Niranjannath (CPAS):** PRICING : DIRECTORY IS PART OF THE OBLIGATION OF S Ps. ITS COST MAY BE COVERED BY ADs, IT IS BEST

- MEDIUM PRESERVED BY CONSUMER FOR AT LEAST 3 YEARS.
No other Ad is equivalent to this.
- (x) **Islampur Ramkrishnapally Rural Welfare Society:** There should be similarity in pricing of Telephone Directory in the different SSA, the price tag should be maintained by the DoT /TRAI.
 - (xi) **Orissa Consumers' Association:** Price should be as minimal as possible as the licensee will cover the cost from yellow pages & ads.
 - (xii) **Ramesh Chandra-NCHSEBPL:** The pricing of telephone directory should mainly be fixed keeping the interest of the customers. A nominal charge for the telephone directory from the customers can be considered.
 - (xiii) **Uphokta Sanrakchhan & Kalyan Samiti:** In the interest of public, price should be determined of Directory so lower that directory can be provided to each and every subscriber. For this purpose a subsidy should be given to publicator on publication for the lowest of the price of directory.
 - (xiv) **AUSPI:**
 - (i) The Authority should not regulate prices. It should provide flexibility to the NIDQS operator to decide revenue depending on its business model.
 - (ii) The Authority to create conducive conditions to invite investment in this sector so that market is competitive.
 - (xv) **COAI:** We would again like to **submit that a printed directory is fast becoming obsolete and** hence it needs to be examined as to whether there is a need for a printed directory or not. Incase the need for a printed directory is felt, the authorized agency/licensee for directory publication may determine the price of the directory, based on market demand, business viability and commercial negotiations etc.
 - (xvi) **Bharti:** While, we are of the view that the requirement of printing of telephone director should not be insisted upon and other alternate means should be encouraged. However, if the Hon'ble Authority still feels otherwise, then the licensee, who is publishing the telephone directory, may determine the price of the directory, based on market demand and as per its own business model in respect of advertisements, information pages and special entries of customers.
 - (xvii) **BPL:** Pricing of the printed version of the telephone directory should be left to the licensee companies based on their cost and what the market can bear. Since there will be enough competition and more than one directory will be available to the consumers, the authority need not be over concerned with the pricing issues.
 - (xviii) **BSNL:**It will be difficult for the Government to fix the prices of the telephone directory. Presuming that there will be no mandatory procurement by the service providers from the entity which will be authorized to print such directories and it will also not be compulsory for the customer to buy it, the pricing of the telephone directory may be allowed to be determined by the market.
 - (xix) **Reliance:**

- The NIDQS operators may be permitted to decide the price of the directory, based on market demand and commercial negotiations with fixed line service providers, advertisers, special entries of customers etc.
 - The price forbearance will provide flexibility to NIDQS operators to decide its business model.
- (xx) **TATA:**
- The Authority should not regulate prices. It will provide flexibility to the NIDQS operator to decide revenue depending on its business model.
 - The Authority may try to create conducive conditions to invite investment in this sector so that market is competitive.
- (xxi) **Hari Infonet Ltd.:** It should be fairly charged to subscriber with 10 % subsidy to maintain quality printing. To avoid the miss use I recommend to charge 90% of printing amount. Because it has been found in past that no. of subscriber just take away directories and sale the same in scrap just to earn money when it is being provided free of cost.
- (xxii) **OYPPA: Pricing :** This is a delicate issue and has to be dealt with very carefully. Pricing is a mechanism which would ensure, to a certain extent, economic viability of the project. However, considering the best practices as well as the trends / practices prevailing in other countries, there is likely to be customer resistance. But, in the long run it is necessary to bring in an element of value to the telephone directory for which pricing mechanism can be applied..

Value Proposition : The present day telephone directory should get transformed from the current drab / uninteresting product to a public utility publication. It should not only have properly classified telephone numbers but also a well compiled product and service information in the form of yellow pages and other public utility details.

The specifications of paper, printing and size framed in the year 1986 needs a thorough review to fall in line with the International Best Practices as well as make it suitable for Indian conditions to utilise print capacity established in India. There should also be certain flexibility in the matter of size, paper, etc. to suit the individual publisher and market requirement.

Having taken note of the above factors, it is important to be extremely sensitive to the consumer association's view point in this regard. In the initial three years, the price should be very nominal – say up to 25% of the cost of the directory and later on it could gradually increase to cover 50 - 75% of the cost.

USO Fund : In cases where the advertisement revenue potential of the directory published falls short of the actual cost and most importantly for those districts like semi urban or rural telecom districts where there is no advertisement generation potential at all (as there is no need of a Yellow

Pages being small market place), the cost of the directory should be reimbursed to the publisher out of the allocation out of the USO fund.

To make the matter simple, the districts can be divided into :

<u>District/Area</u>	<u>Pricing mechanism</u>
(a) metro	market determined
(b) mini metro	market determined
(c) Other towns	Subsidized rate
(d) Under developed / Developing towns / rural areas	Very nominal rate or free of cost.

The logic behind the above proposition is to serve the main purpose of making available the directory to every consumer in the first place and then educating the consumer to use the said directory for his benefit. This would also serve the basic objective of the telecommunication network being used optimally and keeping the people connected. We are confident, in the long run, the cost incurred by the government / the telecom operators on this front would be more than off set by the increase in call revenue arising out of the increased usage of telecom network, easy access of information about people, products and services.

Environment : The classic symbol of Yellow Pages is ‘Walking Fingers’. **This means people walk through the telephone and not undertake physical travel by burning fuel for conducting their commercial / social activities. Thus, the ITD concept addresses the most important and burning issue of the present world i.e. conservation of depleting energy resources – FOSSIL FUEL.**

As regards modalities, it is advisable to keep it simple by determining the price of the directories based on the number of pages and to be priced differently for different types of districts. The price could be further reduced in proportion to the number of advertisement space in the yellow pages attached to the directory. Any shortfall to be made can be by USO fund with proportionate contribution by the TELCOs. Thus this is a win-win situation for all concerned.

6.9 Should there be a performance bank guarantee for the new licensee for publication of an integrated telephone directory for fixed line telephones? If yes, suggest the amount and modalities.

- (i) **Bharat Jyoti Consumer Advocacy Group:** Yes, It could be Rs 50 lacs.
- (ii) **Citizen Consumer & Civic Action Group:** To increase the accountability of the licensee, a performance bank guarantee will definitely help.

- (iii) **Consumer's Association(PA Surendran):** Performance Bank Guarantee to be followed.
- (iv) **Consumer Care Society:** Whatever present field proven practices are there can be followed.
- (v) **Consumers' Forum:** Yes, there should be Bank guarantee. Amount may be fixed according to the number of subscribers, preferably RS.10 for a customer.
- (vi) **Dr. Niranjannath (CPAS):** Let it be determined by DoT & TRAI.
- (vii) **Islampur Ramkrishnapally Rural Welfare Society:** Yes, there should be a performance bank guarantee to ensure compliance of the terms and conditions of license. The amount of Bank guarantee may be as prescribed by the TRAI.
- (viii) **Orissa Consumers' Association:** Yes.
- (ix) **Ramesh Chandra-NCHSEBPL:** If the new licensee is technically and financially sound enough we should not think of a bank guarantee.
- (x) **Uphokta Sanrakchhan & Kalyan Samiti:** License should be under contract between licensee and authority by whom both parties are bound under a contract and guidelines. It is not necessary to get bank guarantee but there should be cash security/guarantee under a criteria. If any of them contravened of the contract/guidelines the security should be forfeited by Govt.
- (xi) **AUSPI:** A nominal bank guarantee of around Rs 1 crore may be prescribed for an NIDQS operator. This guarantee will not add significant cost for the operator but at the same time it will keep non-serious players at bay.
- (xii) **COAI:** **COAI has held the view that Bank Guarantees do not serve any purpose and** only impose an additional unnecessary burden on the service provider. And hence Bank Guarantees **should be done away with.** In line with the above, we would like to submit that there should be **NO** Performance Bank Guarantee (PBG) for the new licensee for publication of an integrated telephone directory for fixed line telephones. However, the Hon'ble Authority may like to ensure that various means are available to ensure that the concerned operators meet its performance obligations.
- (xiii) **Bharti:** No comments.
- (xiv) **BPL:** There need not be any proforma bank guarantee. However, financial bank guarantee of suitable amount may be taken from the licensees based on the anticipated revenue share payable for one main issue of the directory in every service area.
- (xv) **BSNL:** Performance Bank Guarantee should positively be there. However, this amount has to be determined based on whether the licensee is permitted to publish for a SSA or for the entire circle.
- (xvi) **Reliance:** There may be PBG for nominal amount of around Rs 25 lakhs for metro and A category circles, Rs 15 lakhs for circle B and Rs 10 lakhs for circle C.

- (xvii) **TATA:** A nominal bank guarantee of around Rs 1 crore may be prescribed for an NIDQS operator. This guarantee will not add significant cost for the operator but at the same time it will keep non-serious players at bay.
- (xviii) **Hari Infonet Ltd.:** Their should be a performance guarantee for the new licensee for publication of integrated telephone directory for fixed line telephone as follows
- On time job 5% extra for completing job.
 - On delay per day Rs 500 penalty for first 15 day's.
 - On delay per day Rs. 1000 penalty for all days after 15th day till 30 day's.
 - On delay per day Rs. 3000 penalty for all days after 30 Day's.
 - On compromising the paper quality 10% of the order value.
 - On poor quality of printing in **all** directories 10% of the order value
- (xix) **OYPPA:** It is suggested that the performance guarantee be fixed based on the licensing area depending on the grade of the circle. We suggest the following:

Grade of CIRCLE	Amount (Rs. In crores)
Metros	5.0
A	3.0
B	2.0
C	1.0

6.10 Do you agree that the draft guidelines proposed at para 2.5 relating to publication of an integrated telephone directory for fixed line telephones are adequate for publication of an integrated telephone directory for fixed line telephones? In case considered inadequate, suggest any other additional items to be included, along with reasons?

- (i) **Bharat Jyoti Consumer Advocacy Group:** Adequate.
- (ii) **Citizen Consumer& Civic Action Group:** We agree with the draft guidelines proposed.
- (iii) **Consumer's Association(PA Surendran):** Agreed.
- (iv) **Consumer Care Society:** Agree with TRAI guidelines.
- (v) **Consumer Guidance Society:** More information like Web, E-mail address and fax Number may be published in respect of public utilities and Government offices
- (vi) **Consumers' Forum:** Yes, it is adequate.
- (vii) **Dr. Balachandran (KCSS):** Adequate.
- (viii) **Dr. Niranjannath (CPAS):** Yes.
- (ix) **Islampur Ramkrishnapally Rural Welfare Society:** Apart from the draft guidelines proposed in Para-2.5 following additional points may be included –

- Govt. bodies , Public office or organisations, Public utility services, Peoples representatives such, Panchyat Pradhan, MLAs, MPs should not given the “opt-out” option.
 - There should be provision for publishing directory in local languages.
- L. (i) Special Information Pages :**
- List of all fixed line telephone service providers and their website address and also name , designation, address, contact no. of Consumer dealing officer of the respective service provider should be available.
 - There should be detailed information about the registered Consumer Advocacy Group (CAG) member of TRAI working in the respective zone.
- (x) **Consumer Unity and Trust Society:** Directory should be available in the soft form to consumers such as CD ROM. This soft copy of the directory may be updated through internet. The price for soft copy should be reasonably low. It will save lot of money and promote the user to use soft copy of the directory. The further will reduce the demand for paper which is environmental point of view desirable. In the guidelines issued Department of Telecom (DoT), dated 12.11.2007 ***DOT decides to launch Mobile Number Portability in Metros in the initial phase.for Mobile Number Portability***, a “**logically centralized database**” is to be established. It states- “Mobile operators, through neutral third party, shall establish logically centralized database. The cost of the data base shall be borne proportionately by each operator.” In our opinion, all the service providers will be required to provide information about consumer names and numbers to this database system operator. We suggest that National Directory should be prepared by this operator or some subsidiary companies working under/in association with this third party system operator. It will save lot of money and ultimately benefit the consumers by reducing the price of the directory
- (xi) **Orissa Consumers’ Association:** Yes.
- (xii) **Ramesh Chandra-NCHSEBPL:** It is quite exhaustive.
- (xiii) **Upbhokta Sanrakchhan & Kalyan Samiti:** We are agree with the draft guidelines at para 2.5 relating to publication of Integrated Telephone Directory.
- (xiv) **AUSPI:** The guidelines appear to be Ok.
- (xv) **COAI:** Guidelines suggested by the Authority as per para 2.5 are adequate. However, as stated above, the Authority will have to **examine the relevance of having a printed directory and the approach of opt- in should be followed for fixed line services.**
- (xvi) **Bharti:** No Comments.
- (xvii) **BPL:** The draft guidelines proposed in para 2.5 of the consultation paper for printing an Integrated Telephone Directory SSA wise are adequate. However, we feel even in the case of fixed line phones the subscribers should be given “opt in” option rather than “opt out” for including their names/addresses in the directory.

- (xviii) **BSNL:** Overall guidelines need to be reviewed in view of our comments given herein above.
- (xix) **Reliance:** Guidelines suggested by TRAI are sufficiently broad and adequate.
- (xx) **TATA:** The guidelines are comprehensive and adequate.
- (xxi) **Hari Infonet Ltd.:** Reply on 2.2.08.
- (xxii) **OYPPA:** Draft Guidelines : Our point wise comments are as follows :

2.5.1

(a) SSA-wise directory is ideal. However, within a SSA, if more than 50% of the numbers fall outside the main city area, it is better to publish the SSA directory in two parts – one for the main city and the other one for the remaining areas.

In case of metros like Mumbai, Delhi, Chennai and Kolkata, it is ideal to divide the directory into at least four zones like what is done in London. This would keep the costs low and at the same time give an opportunity to the consumer wanting the directory of other zone to purchase if he desires.

(b) Tri-annual phone directory as per the current policy is fine with the main directory followed by two supplementary. The supplementary should have complete business numbers as per the present policy, with advertisement, if any. However, the license should be for a minimum three tri-annual period i.e. 9 years and not one tri-annual period as is being practiced now.

(c) There should be an on-line transmission of data on a daily basis. This is very much feasible both technically and practically as data is uploaded in the FRs / similar system maintained by all TELCOs. Any leeway given to TELCOs to feed the data with a certain time gap will be a cause of failure of the project since it is feared that telecom operators are likely to come out with several reasons for not providing the data. If the data is provided, it may not be complete and the authorized agency, instead of concentrating on the publication of ITD, would be embroiled in controversies and resolving the issues of data alone.

TRAI can prescribe the format and insist on transmission of data daily. Since the deletion and corrections are also intimated daily along with the new additions, the directory can always be kept updated with proper programming with least human interference. More importantly, as stated earlier, this would check several instances of over / under reporting of actual subscriber base reported to be practical by some telecom operators who resort to this to suit their convenience and increase their stock market valuation.

(d) All the measures initiated in (d), as far as the customer is concerned, should be implemented and more importantly the service providers should start treating directory information and availability as an essential part of over all customer service. However, there should be no relaxation given to the service providers in the matter of supply of data to the ITD publisher/s.

(e) Yes, for any additional entry or larger size entry, the subscriber should pay.

(f) Yes

(g) Yes, however, the specifications should be reviewed at least once in three years. Further, considering the lack of adequate manufacturing facilities in India for low grammage paper, **produced out of recycled material (waste paper)**, THE AGENCY SHOULD BE PERMITTED TO IMPORT LOW **GSM ENVIRONMENT FRIENDLY PAPER** AT NIL CUSTOMS DUTY. In addition to the above, certain incentives may be given to Indian paper mills producing low gsm environment friendly directory grade paper. There should be Excise Duty / Sales Tax / VAT on paper supplied to ITD publisher for using in the printing of ITD.

(h) This can be done at agreed cost. In addition, if the licensee has collected advertisements for subsidizing the directory publication (YPs), he could also have concurrent right to distribute the directories to business / other users so that he is able to fulfill the commitment given to the advertisers in the matter of ensuring certain minimum level of circulation of the directories which is essential for its usage and response generation to the advertiser.

(i) Yes

(j) Yes, this can be implemented. There should however be a provision for review periodically – say once in three years at least in the interest of success of the project.

(k) Yes, this would be ideal and, in fact, should be made compulsory since the directory publisher has primary interest in promoting the usage of directory, he will be ideally placed to carry out this task. **In fact, this practice is followed in US.**

(l) Format agreed.

(m) Considering the number of SSAs and growth expected on account of penetrating in the rural segment, the specification needs an overall review within the Policy framework. This requires a thorough review incorporating the points mentioned in the specifications, periodicity and distribution as mentioned elsewhere in this response

6.11 Any other suggestions for publication of telephone directory with reasons thereof?

- (i) **Bharat Jyoti Consumer Advocacy Group:** None.
- (ii) **Consumer's Association(PA Surendran):** Ensure the printing of the Directory with good quality materials.
- (iii) **Consumer Care Society:** Nil

- (iv) **Consumer Unity and Trust Society:** One directory should contain both types of contact no-mobile and Landline. Otherwise consumers will have to pay extra money for getting information on the both types of phones.
- (v) **Consumers' Protection Association:** The publication of Intetrated Printed Directory should be annual.
- (vi) **Consumers' Forum:** A provision may included to impose fine for intentional defaults.
- (vii) **Dr. Balachandran (KCSS):** Implement RTI Act.
- (viii) **Dr. Niranjannath (CPAS):** Not at this stage.
- (ix) **Islampur Ramkrishnapally Rural Welfare Society:** No comments.
- (x) **Ramesh Chandra-NCHSEBPL:** Timely publication of telephone directory should be ensured and it must be regular.
- (xi) **Upbhokta Sanrakchhan & Kalyan Samiti:** The publication of directory should be so easy in language that may be easily understand by subscribers and also in the interest of general public. If subscriber change there area/Address in the same city tha Telephone Number of transferred Telephones should be mention on separate small Directory amongwith main directory and amended time to time. And in a small directory should contained old Number of telephone also for easily identification.
- (xii) **AUSPI:** No other suggestions.
- (xiii) **COAI:** No comments.
- (xiv) **Bharti:** In its Consultation Paper, the Hon'ble Authority has stated that the printed telephone directory should be published for fixed line services and sought the comments of the stakeholders on various issues related to this activity.

As the Hon'ble Authority is well aware that printing a telephone directory consumes enormous resources especially paper, which is extremely critical from environment's perspective and thus, it would be imperative that for taking any decision to this effect, the Incumbent Operator is advised to share its past experience on the utility of printed telephone directory at the ground level. We believe that in today's scenario, the requirement of telephone directory has become obsolete as today; other alternate means are easily available in the market such as Web-site, CD etc. Thus, we request that the Hon'ble Authority have a fresh view on the requirement of printed telephone directory.

Generally, the requirement of printed telephone directory arises when an individual wants to have the contact details of the public utility services such as emergency services, hospitals, restaurants etc. etc. Even today, there are various printed directories (yellow pages) already available in the market, which are being published by various agencies at regional / local levels, which capture these details. Under these circumstances, will it be appropriate to come out with another printed telephone directory?

As stated above, the Hon'ble Authority may have a fresh look into the requirement and necessity of the printed telephone directory in today's scenario.

While, as stated above, we believe that the requirement of printed telephone directory has become obsolete with the availability of other alternate means, however, if the Hon'ble Authority still feels otherwise, then all the operators should be allowed to publish the telephone directory.

In case, any operator intends to publish the telephone directory, other operators may be mandated to share the details of its subscribers, who have chosen "Opt-In" approach. However, the decision of publication of telephone directory should be decided as per the concerned operator's business model and other operators should not be insisted to share any cost related to this activity.

(xv) **BPL:** Same as 6.10.

(xvi) **BSNL:** As submitted herein above, BSNL is not in favour of printing of telephone directory of fixed line telephones only.

(xvii) **Hari Infonet Ltd.:** Reply on 2.2.08.

(xviii) **OYPPA:** Other Suggestions

While Indian Telecom industry has performed exceeding the expectations of one and all, the related service of making available Information about telephone subscribers has remained primitive. The focus so far seems to have been on providing telephones and adding to the numbers. **Customer convenience, customer service and an integrated approach is the need of the hour now**. In this background, particularly in the matter of ITD publication, India is at the **bottom of the ladder** partly because of policy issues, attitude of the telecom operators and **also** entry of fly by night operators in the telephone directory industry. This issue should be tackled with a long term perspective and only serious players with proven track record and demonstrated competence should be allowed to enter, develop and nurture the market.

World-wide and particularly in US, the directory and YP market has 6% share in the total national advertisement market, whereas in India it is less than 0.10 %. With proper policy initiatives, as has been suggested in your paper and careful scrutiny and selection of competent agency and regulatory support to develop the market, **India can also achieve significant success in this important area.**

(xix) **Senthil M.:**

a) In the interest of privacy, only Fixed line service should have both printed and online directories. The same is not recommended for mobile connections.

b) Considering the practical aspects, an integrated telephone directory, especially one, would be impractical and outdated (when it comes out, in view of the rate at which new connections are being purchased).

c) A better alternative would be to mandate each service provider (including BSNL) of Fixed landline phones to come out with the following:

(i) A printed directory-each year free of cost.

(ii) Directory in the form of a CD-ROM once every 6 months

(iii) Sell the above mentioned at reasonable cost.

(iv) An online directory with up-to-date records.

d) In the interest of privacy, especially for women, professionals and business- people, directories of any kind should not be mandated and published for mobile connections.

Contd.....35/-

II. Issues relating to new licence for National Integrated Directory Enquiry Service (NIDQS):

6.12 (a) Whether licence system to be used for NIDQS and the incumbent operator namely BSNL may be authorized to provide National Integrated Directory Enquiry Service? Please give reasons for each option with justification thereof?

- (i) **Citizen Consumer& Civic Action Group:** The license system to be used for NIDQS should be authorized to only one party.
- (ii) **Consumer's Association(PA Surendran):** BSNL / MTNL may be authorized.
- (iii) **Consumer Care Society:** In case the government decides on giving preference to BSNL or MTNL for its own reasons, our views have no meaning at all. If there are no overriding reasons for such a decision, then in order to minimize litigations, prefer open tendering and follow normal commercial procedures to avoid controversies.
- (iv) **Consumer Guidance Society:** License system should not be introduced for NIDQS. BSNL should be authorized to provide National Integrated Directory Enquiry Service at the inception in the light of its past experience and exposure. Licensing system may be explored in due course of time.
- (v) **Consumers' Forum:** Yes, license system has to be used and BSNL may be authorised. Because it is the only Operator which is having wide net work even in rural areas and also it is having long experience.
- (vi) **Dr. Balachandran (KCSS):** Present BSNL model may be continued.
- (vii) **Dr. Niranjannath (CPAS):** NO. Present service is far from satisfactory especillay in MTNL & large cities. New agency shall try to improve if it has fear of termination.
- (viii) **Islampur Ramkrishnapally Rural Welfare Society:** Yes, there should be a license system for NIDQS. There should be two license for NIDQS, to maintain market competition. One may be the BSNL, as they have prior experience in this field.
- (ix) **Orissa Consumers' Association:** Yes, initially BSNL be authorized for the same.
- (x) **Ramesh Chandra-NCHSEBPL:** There should be a licence system for National Integrated Directory Enquiry Service and since BSNL is already providing this service, it should continue with some modifications.
- (xi) **Upbhokta Sanrakchhan & Kalyan Samiti:** BSNL may be authorized to provide NIDQS because such agency already having experience in this field.
- (xii) **AUSPI:** NIDQS should be permitted under separate license/authorization. BSNL should not be permitted to provide NIDQS under existing license as existing license does not cover NIDQS. Initially only access providers or subsidiaries or companies promoted by them should be eligible to get NIDQS License/Authorization.

- (xiii) **COAI:** We would like to submit that, BSNL itself being a service provider should not be authorized to provide National Integrated Directory Enquiry Service. The setting up and implementation of NIDQS should be through active participation of a consortium of service providers. This would ensure holistic, speedy and affordable implementation of the service and would also result in cost saving.
- (xiv) **Bharti:** No comments.
- (xv) **BPL:** National Integrated Directory Enquiry Service providers should be licensed based on open bidding process. BSNL may not be given any preference for providing National Directory Enquiry Service. If considered necessary BSNL may be authorised to provide the service on payment of a matching entry fee and acceptance of other commercial terms as determined by following the bidding process.
- (xvi) **BSNL:** BSNL may be authorized to provide NIDQS because, it is already providing Directory Enquiry Service for fixed line and has the requisite experience in this regard. Further, issues related to data secrecy and security will also not arise if this service is continued to be provided by BSNL for the customers of other operators as well.
- (xvii) **MTNL:** Circle-wise license to telecom service providers are being issued in India and 6-8 operators per circle are available as on date. In addition to that new licenses are also being issued which will further add the number of operators in each circle. To maintain the updated data and co-ordinate with all the service providers at national level will become a Herculean task for a National Integrated Directory Enquiry service Provider. TRAI in its recommendation dated 5th May, 2005 has also recommended that an integrated directory enquiry service for mobile customers at circle level is ideal. Thus, an integrated directory enquiry service at circle level should be available instead of National Integrated Directory Enquiry Service.

Therefore, license for integrated directory enquiry service for fixed as well as mobile should be issued on circle basis. First the modalities for the integrated enquiry service at circle level should be worked out and then the option should be given to the incumbent operator and new licensees.

- (xviii) **Reliance:**
- BSNL should not be permitted to provide NIDQS under existing license as existing license does not cover NIDQS. These services can be permitted under separate license/authorisation.
 - Initially only access providers or company promoted by them should be eligible to get NIDQS. License/Authorisation.
- (xix) **TATA:**
- TTL supports provision of directory enquiry service for the benefit of the consumers. However, we are not in agreement with the view of introduction of a third party National Integrated Directory Enquiry Services.

- Initially only access providers or company promoted by them should be eligible to get NIDQS. License/Authorization.
- We propose implementation of online directory enquiry services by access service providers for their own subscriber base and access to such directory enquiry services should be made possible from all the access providers' networks in a standardized manner i.e the directory enquiry services telephone number of any access provider should be accessible from any telephone.
- BSNL should not be permitted to provide NIDQS under existing license as existing license does not cover NIDQS. These services can be permitted under separate license/authorization.

Provisioning of NIDQS would have the following difficulties/ hurdles.

- The point of presence of NIDQS providers is required to be interconnected with the networks of the access providers with adequate number of circuits in each service area free of cost as suggested by the Authority.
- The measures adopted by third party (suggested NIDQS providers) to maintaining the secrecy and confidentiality of the data may not be adequate/ foolproof and may lead to complicity later on.
- We, therefore, propose that directory enquiry service may be provided by individual access service provider in respect of his subscribers instead of introducing new agencies/ licensees for providing NIDQS. Access to such directory enquiry services should be made possible from all the access providers' networks in a standardized manner i.e the directory enquiry services telephone number of any access provider should be accessible from any telephone.

(xx) **Hari Infonet Ltd.:** Yes license system is to be used for NIDQS but incumbent operator BSNL / MTNL should not authorized to provide National Integrated Directory Enquiry service as they are not been maintaining the service at present for local inquiry and lots of complains are found. It is even cost effective solution for BSNL / MTNL to privatize their present local service at present. In such case it is not advisable to hand over huge responsibilities to Company like BSNL / MTNL let access provider be a access providers only. More over BSNL & MTNL have out source this obligation in past to maintain good service which was proved more cost effective please study our case with BSNL Ahemdabad – Gujarat circle year 2000. Where our staff (Newly recruited) was handling more calls than calls handle by BSNL staff who where working on the same position for more than 3 years !!! Not limited to that they have been drawing higher salary too !!!!

(xxi) **Infonxx:**
It is clear that all operators in India (in common with most countries) are very reluctant to provide their customers' vital telephone data to any competitor network operator (especially the incumbent) for fear that the proprietary information would be accessible to the incumbent and will be

subsequently combined with calling pattern data in a form that would enable customer poaching by one network of another network's customers. It is also clear that although operators were mandated by law in the past to provide this information, their overriding concern to protect their customer base has continued to undermine the collection of this vital data and thus prevent the best database from being collected and established. In the United Kingdom it is believed that mutual suspicion between rival network operators and the incumbent British Telecom (BT") (who hosts the key database solution for Directory Enquiries) have arguably played a significant role in the continued failure to reach agreement on offering mobile numbers to the population, despite over 5 years of negotiation.

The intent of the NIDQS is to provide access for the populace of India to quality DQ (Directory Enquiries) services. For DQ to be both available and reasonably priced the service provider needs to be focused on DQ as its primary service offering. By issuing a license to an incumbent provider there is little operational or financial incentive for the incumbent to focus on DQ while they are focused on other potentially more profitable services such as broadband internet access. Additionally, there is history in other countries, including India, where all network operators, including the incumbents, used their dominant marketplace position to stifle completion or abuse the process ^{Note: 1.} We, therefore, recommend that all Networks Operators should be barred from applying for this license, and so should any company in which Network Operators control any stake or have a mutual Director from their Board.

The less than satisfactory level of participation by incumbent providers in DQ services is also evident in India's current arrangements. Per section 3.1 of the TRAI DA-DQ Consultation Paper, the current telecommunications licensees have an obligation to provide DQ services, yet the service is either not deployed or has poor quality. It should also be noted that in those countries where the incumbent provider continued to provide DQ service the level of innovation and quality was less than the "pure play" directory service.

It is, therefore, important that the tender only be open to companies with no ownership connections with Indian telecoms networks to avoid concerns of conflicts of interest that could undermine the trust of telecoms networks who will be providing data to this database and licensee, and to insure innovation and quality of services are tantamount.

- (xxii) **Infovision Group:** Yes it should be the license system, and all providers should be held equal under the law. BSNL or any other private telecom service may be authorized to get a license, however the ultimate service delivery to be outsourced to a third party service provider with special expertise thereby creating a centre of excellence for the service. This works as a check and balance on quality of service provided and complacency and deterioration of service delivery is controlled.

- (xxiii) **OYPPA:** Yes. It is necessary to evolve a license system for NIDQS and BSNL/MTNL is free to compete in securing this license on equal terms with other parties. While BSNL/MTNL deserves all credit for manning the 197 services, due to their staffing pattern, advanced age of the employees and their outlook towards Directory enquiry services, they may find it difficult to execute this assignment with large data base. Move over, there could be objections/apprehensions from the private operators to share the data directly with another competitor, i.e. BSNL/MTNL. Hence, it is advisable to have a third party i.e. non TELCO as a license operator for NIDQS.
The license system that has been suggested primarily takes care of evolving a mechanism for specification of the service requirements and selection of a competent licensee.

6.12(b) What should be the optimum number of authorised agencies/licensees for National Integrated Directory Enquiry Service keeping in view the interconnection requirement and competition? Please comment with reasons.

- (i) **Citizen Consumer& Civic Action Group:** There should be only one authorized agency for the National Integrated Directory Enquiry.
- (ii) **Consumer Care Society:** Not more than three and not less than one, to meet any exigencies or protect against any calamity break downs.
- (iii) **Islampur Ramkrishnapally Rural Welfare Society:** There should be two nos. of authorized agencies / licenses for NIDQS to maintain the competitions.
- (iv) **Ramesh Chandra-NCHSEBPL:**
- This service is now provided both for fixed lines and cellular mobiles (post paid and pre-paid), it should be chargeable one.
 - Service should be made more attractive by giving yellow pages information.
 - Instead of only one authorized agency / licensee for NIDES, there should be two such authorized agencies / licensees for this service. It will have a competition and thus, better service can be think of.
- (v) **Upbhokta Sanrakchhan & Kalyan Samiti:** There should be at least 3 or 4 agencies area-wise accordingly for easy and short time consuming for publication at lowest price.
- (vi) **AUSPI:** Initially the number of NIDQS may be restricted to 4 including BSNL/MTNL as mentioned in our response at para 6.2
- (vii) **COAI:** The optimum number of authorized agencies/licensees could be determined based on market dynamics. **However, the Authority may also like to ensure that this segment is not flooded with numerous operators. And in this regard the interconnection aspects may also have to be considered.** Keeping the above in mind **we are of the view that two or three would be the adequate number of authorized agencies/licensees for National Integrated Directory Enquiry Service.**

- (viii) **Bharti:** Since, the selected operator will be expected to incur the CAPEX and OPEX including the cost of connectivity with service providers as well as to provide affordable service to the customer, the Hon'ble Authority may like to ensure that this particular segment is unnecessarily not flooded with numerous operators to make this business unviable.
- (ix) **BPL:** In our view two or maximum three players may be licensed for providing the Directory Enquiry Service. In our opinion it would be better to license the operators on circle wise basis rather than on all India basis. Alternatively the service may be provided on Regional basis.
- (x) **BSNL:** As per Para 4.3, majority of the consumers abroad use only one Service Provider and feel that level of choice is confusing. As such, BSNL may be the only NIDQS Service Provider in India. However, in case it is decided to have more Service Providers apart from BSNL, the total number of Service Providers should be restricted to maximum four including BSNL.
- (xi) **MTNL:** As there is no limitation on the number of licensees providing telecom services in any circle, there should not be any limitation on the number of directory enquiry service providers in a circle.
- (xii) **Reliance:**
- Initially only access providers and companies promoted by them should be eligible to become NIDQS operators
 - Initially the number of NIDQS may be restricted to 4 including BSNL/MTNL
 - Subsequently more operators could be allowed in case NIDQS market is not sufficiently competitive.
- (xiii) **TATA:**
- Refer to our reply to 6.12 (a), we have proposed that directory enquiry service should be mandated to be provided by individual access service provider in respect of its subscribers instead of introducing new agencies/ licensees for providing NIDQS. Access to such directory enquiry services should be made possible from all the access providers' networks in a standardized manner i.e the directory enquiry services telephone number of any access provider should be accessible from any telephone.
 - Initially the number of NIDQS may be restricted to 4 including BSNL/MTNL as mentioned in our response at para 6.2
- (xiv) **Hari Infonet Ltd.:** Their should be not more than 3 no of authorized agencies/licensees for National Integrated Directory Inquiry Service per Telecom circle. The reason is within the question requirement of no creation / inter connection from all SSA and call forwarding to a virtual no of five digit to particular access provider. As per our experience our virtual no is not yet working from near by exchange of Morbi which is just 60 KM from Rajkot after repetitive reminder, request and complain till the level of Minister of Telecom !!! Further our experience shows that our own virtual no is not yet accessible by private operator like Reliance, TATA Tele Service

and Bharti from their fixed line network. Hence limiting three operator in DQ will help bring out good result successfully with quality of service.

- (xv) **Infonxx:** The Authority should limit the number of licenses to only those companies with telecom experience and the economic and operational resources to provide a viable service.

The threat of too many licenses is that the marketplace becomes saturated by providers causing limited DQ revenues to be spread thinly, thus causing the DQ initiative to collapse. Due to the limited disposable income of the DQ marketplace in India, there is a real possibility that too many licenses could make the marketplace unattractive for investment and cause the failure of NIDQS ^{Note:2}.

INFONXX recommends a two (2) provider environment for both local and national DQ. The licensing requirements would include mandatory provisioning of data by the telecommunications carriers as well as supported agencies. Annex 1 outlines a list of required data to deliver a successful directory service.

- (xvi) **Infovision Group:** This should be an open market economy. A serious amount _____ for _____ the license fee will ensure that the players are serious. All telecom providers will probably want to take a license, and there should be independent third party providers to ensure a competitive marketplace. We do not foresee any interconnect challenges for a database. We believe that there should be a single party like NIC in charge of a raw database, and the different providers can pay for reading records (dips), while telecom providers would be required to update the central database on a periodic basis.
- (xvii) **OYPPA:** The optimal number of authorized agencies/licensees for NIDQS is two. This could be one private party – non TELCO and one PSU i.e. BSNL/MTNL if it is absolutely necessary. The reason for this suggestion is

i) Since BSNL/MTNL have been rendering this service, they can continue to do so for all their subscribers and by pooling the data of those operators who are willing to share the data with BSNL/MTNL. As regards the non TELCO private licensee there should not be any hesitation on part of all the TELCOs to share the data since your guidelines has already specified that the data procured by the licensees for ITD/NIDQS has to be used for that purpose alone.

ii) The licensee for NIDQS should be for a service area i.e. circle to facilitate proper interconnection and ushering healthy competition in the delivery of better service to the end user.

6.13 Do you agree that the suggested scope of licence is adequate to meet the requirement for implementing National Integrated Directory Enquiry Service? If not please give your suggestions and additional points with reasons.

- (i) **Citizen Consumer& Civic Action Group:** The suggested scope of the license is adequate to meet the requirement for implementing the NIDQ services.
- (ii) **Consumer's Association(PA Surendran):** Others are not required. if BSNL / MTNL are authorized
- (iii) **Consumer Care Society:** No comments.
- (iv) **Consumer Guidance Society:** Not adequate.
- (v) **Consumers' Forum:** Yes, scope of license as suggested by Authority is good and adequate to serve the interests of Consumers.
- (vi) **Dr. Niranjannath (CPAS):** ONE AT CIRCLE LEVEL IF NOT AT SSA LEVEL.
- (vii) **Islampur Ramkrishnapally Rural Welfare Society:** Yes, we think that the suggested scope of license is adequate to meet the requirement for implementing NIDQS.
- (viii) **Orissa Consumers' Association:** Yes.
- (ix) **Ramesh Chandra-NCHSEBPL:** The suggested scope of licence is adequate in implementing N.I.D.E.S.
- (x) **Uphokta Sanrakchhan & Kalyan Samiti:** Scope of licence is adequate to meet the requirement for implementing NIDQS because they are having experience.
- (xi) **AUSPI:** The suggested scope of License broadly meets the requirement for implementing National Integrated Directory Enquiry Service.

Additional Point relating to Numbering Scheme

As per national numbering plan, 197 is for Directory enquiry. NIDQS providers may be allowed 197 XXX numbering for directory query.

Separate levels for local directory /National/yellow pages directory enquiry is not needed. Separate level may not help to efficiently utilize resources.

BSNL/MTNL should not be allowed to provide NIDQS on existing 197 number as that would give them huge competitive advantage.

There are international examples like in UK where a new numbering system 118 XXX was introduced so that incumbent does not have any competitive advantage. After opening of NIDQS in UK, directory enquiry provided by incumbent on 192

- (xii) **COAI:** The suggested scope of License seems adequate to meet the requirement for implementing National Integrated Directory Enquiry Service.
- (xiii) **Bharti:** No comments.

(xiv) **BPL:** The suggested scope of license in the consultation paper is adequate to meet the requirements for implementing National Integrated Directory Enquiry Service. However we feel that it should be the responsibility of the NIDQS provider to arrange and provide adequate interconnection links with all the service providers. Since the Directory Enquiry Service will be a paid service and the licensee will also be providing yellow pages/commercial information on premium rates, the licensee should be responsible for incurring all the expenses involved in interconnection as in the case of a new access service provider who is required to seek interconnection at its own cost with all the then existing operators. It should also be responsible for taking adequate steps for ensuring data security.

(xv) **BSNL:** Scope of license seems to be adequate.

(xvi) **MTNL:** Yes.

(xvii) **Reliance:**

- The suggested scope of License broadly meets the requirement for implementing National Integrated Directory Enquiry Service.

Additional Point relating to Numbering Scheme

- As per national numbering plan, 197 is for Directory enquiry.
- NIDQS providers may be allowed 197 XXX numbering for directory query.
- Separate levels for local directory National/yellow pages directory enquiry is not needed. Separate level may not help to efficiently utilize resourced.
- BSNL/MTNL should not be allowed to provide NIDQS on existing 197 number as that would give them huge competitive advantage. There are international examples like in UK where a new numbering system 118 XXX was introduced so that incumbent does not have any competitive advantage. After opening of NIDQS in UK, directory enquiry provided by incumbent on 192 and 153 for national and international directory enquiry was discontinued. Therefore it is suggested that BSNL/MTNL should also migrate to suggested 197 XXX number.

(xviii) **TATA:**

- The suggested scope of License broadly meets the requirement for implementing National Integrated Directory Enquiry Service.

Additional Point relating to Numbering Scheme

- As per national numbering plan, 197 is for Directory enquiry. NIDQS providers may be allowed 197 XXX numbering for directory query.
- Separate levels for local directory National/yellow pages directory enquiry is not needed. Separate level may not help to efficiently utilize resourced.
- BSNL/MTNL should not be allowed to provide NIDQS on existing 197 number as that would give them huge competitive advantage.

- There are international examples like in UK where a new numbering system 118 XXX was introduced so that incumbent does not have any competitive advantage. After opening of NIDQS in UK, directory enquiry provided by incumbent on 192

(xix) **Hari Infonet Ltd.:** Reply on 2.2.08.

(xx) **Infonxx:** The scope of license as proposed is adequate with some modifications. Although it is proposed that there be two dial string arrangements for DQ, one for local and one for national, it should also be noted that efficiencies are gained by having the NIDQS provider(s) support both local and national DQ calls. This makes for better use of capital investment, operational processes and the supporting user's data.

The proposed license arrangement should allow for maximum flexibility so the NISDQ operator can engage in commercial arrangements with the telecommunications carriers while still maintaining light regulatory oversight. Conversely, the discussion of DQ being a public utility may hinder deployment of a service by placing onerous universal service requirements on a start up business.

INFONXX recommends that NIDQS not have universal service requirements in order to allow the NIDQS provider to focus on service deployment and quality. Also, excessive licensing requirements will have a negative effect on the number of entities willing to take on this activity. Initially deploying the service with voice, text, and web is too much activity at the beginning of the project. INFONXX's recommendation is to deploy the NIDQS in phases with web and text SMS being first in advance of a voice DA offering. By doing these items first, India gets the benefit of a standardized DQ database function while the service provider has the opportunity to evaluate the level of market penetration prior to significant investment in voice DA infrastructure. In INFONXX's European and North American experience, the cost of deploying voice DQ can be 5 to 10 times more expensive than a web or SMS product. This increased investment cost is due to the additional complexity of the voice technology as well as the labor costs associated with call center supported services.

(xxi) **Infovision Group:** Yes - the current scope ensures that the customer has the option of using a service provider of choice and is not restricted to use its own telecom provider.

(xxii) **OYPPA:** By and large, the suggested scope of license is adequate to meet the requirement of implementing NIDQS. Following points may be considered for effective implementation and quick roll-out of the service.

- i) Online transfer of data in real time.

The onus should be on the TELCOs to transfer the data and on the licensee to process and keep the data in a format ready for delivery of the service. Towards the same the licensee should have adequate systems to

demonstrate capability to procure and process huge data in the directive media industry.

Licensees who have experience in servicing global search engines should be preferred. The reason for this is that these licensees (serving Global Search Engines) are attuned to handling data of dynamic nature and their organizations are all equipped to process mass data which runs into several gigabytes each day.

6.14 What eligibility criteria, including net-worth, maximum limit of total foreign equity to be maintained at any time, should be specified for National Integrated Directory Enquiry Service Provider?

- (i) **Bharat Jyoti Consumer Advocacy Group:** There have to be the quality parameters clearly specified e.g (i) waiting time i.e. time to respond should be restricted to 30 seconds (ii) holding time 15 seconds
- (ii) **Citizen Consumer & Civic Action Group:** TRAI may decide on the eligibility, selection and entry fee.
- (iii) **Consumer's Association (PA Surendran):** Not applicable, if BSNL / MTNL are authorized
- (iv) **Consumer Care Society:** No comments.
- (v) **Consumers' Forum:** Eligibility criteria including other things are adequate.
- (vi) **Dr. Niranjannath (CPAS):** Yes.
- (vii) **Islampur Ramkrishnapally Rural Welfare Society:** The applicant company should be a registered under Indian Companies Act. 1956. Financial status should be good and a reputed one. An experience in this field is desirable. Up to 49% FDI may be allowed.
- (viii) **Orissa Consumers' Association:** Yes.
- (ix) **Ramesh Chandra-NCHSEBPL:** What has been given in the eligibility criteria under para 4.4 is O.K. But we feel that more emphasis should be given on technical capability.
- (x) **Upphokta Sanrakchhan & Kalyan Samiti:** Eligibility criteria including net-worth, it is not necessary for foreign equity because BSNL are already having profit and capable to publiced through
- (xi) **AUSPI:** As mentioned earlier, a net worth of Rs 1 crore may be prescribed for NIDQS operator. This would be inline with the net worth of Rs 2.5 crores prescribed for an NLDO.
- (xii) **COAI:** Based on international practices, criteria deemed appropriate by the Authority may be considered. Also the experience of providing the service may be taken into account.
- (xiii) **Bharti:** As far as the eligibility criterion and the method of selection is concerned, the Hon'ble Authority may like to decide the same after keeping in view the market demand, the financial model of this business, international practices etc. etc.

- (xiv) **BPL:** Since this is only a directory information service and the NIDQS provider does not have any access to other communications through the telecom networks, there need not be any upper limit for Foreign Direct Investment (FDI) in companies licensed to provide this service. The minimum networth requirement may be determined based on the assessment of investments involved in providing the service in the entire licensed area. In our opinion the license area should be restricted to either the circle/state or regional basis. The companies having experience of providing call center facilities may be given preference for issuing licenses for this service.
- (xv) **BSNL:** Since it is a matter of data secrecy and national security, the foreign equity should not be more than 49%. The net worth of the company for eligibility criteria should be based on the Capex and Opex involved for providing the said service nationally.
- (xvi) **MTNL:** Eligibility criteria, including net-worth, maximum limit of total foreign equity to be maintained at any time, for circle level Integrated Directory Enquiry Service Provider in case of a new license should be as per the Infrastructure provider license. However, in case incumbent opts for providing integrated directory enquiry service in a circle, incumbent operator should be exempted from any entry fee or licensing procedure and should be allowed to provide the same under the existing license.
- (xvii) **Reliance:** The minimum networth requirement for NLD services is Rs 2.5 crores. In line with that the minimum networth requirement for NIDQS can be around Rs 1 crore.
- (xviii) **TATA:** As mentioned earlier, a net worth of Rs 1 crore may be prescribed for NIDQS operator. This would be inline with the net worth of Rs 2.5 crores prescribed for an NLDO.
- (xix) **Hari Infonet Ltd.:** Only a knowledge of key person of the company with, required infrastructure, with minimum 10 years experience in the field of handling call center should be considered. A company having more than 5% of foreign equity should not be given license at all as it is waste of our foreign reserve. I am agreeing for 5% is just to maintain good business relations with other countries at world trade organization level. Other wise that is also not required in National Directory Enquire Service Providing. Let other countries become our follower
- (xx) **Infonxx:** Eligibility should be limited to those companies that can demonstrate relevant levels of experience in both the Directory Services business and in managing massive telephone information databases.

Potential eligibility criteria are listed here and in section 6.15.

- Demonstrable data protection processes including meeting recognized international standards such as ISO 0027001 or BS 7799.
- Financial stability to maintain operations for the term of the license.
- Minimum of 5 years in managing Directory Assistance Services that are in excess of 200M listings updated daily.
- Minimum of 5 years of managing Directory Assistance Services that are multi-carrier, multinational and multi-language in origin.
- Relevant experience in managing large scale directory databases with high volume daily updates.
- The NIDQS licensee must have the technical knowledge and capacity to store and retrieve data provided by the carriers including the necessary networking connectivity to allow for updates from the carriers.

The current FDI (Foreign Direct Investment) policies for Network Infrastructure Operators allows for 74% foreign ownership. However, due to the high risks, such as unknown data quality, consumer acceptance of the service and per capita disposable income of the Indian population, INFONXX recommends allowing 100% foreign ownership. FDI rules do not limit FDI for Other Service Providers (OSP). With NIDQS classified as OSP the 74%/26% FDI requirement could be suspended. To the best of our knowledge there is no such limitation on foreign ownership throughout the European Union or in Turkey which allows for 100% foreign ownership of locally incorporated companies ^{Note 3:}

Additionally, to mitigate risk and attract investment in NIDQS, the Indian Government may want to consider economic development zones to provide tax credits. The Philippines government has successfully used this methodology to attract capital that improves quality of life through improved infrastructure and meaningful employment.

- (xxi) **Infovision Group:** The eligibility criteria should be the following:
- * The foreign investment should be limited to 74%.
 - * With an Indian partner that has experienced in providing similar services for at least three years to overseas markets.

- (xxii) **OYPPA:** Suggested criteria is as follows:

The prospective bidder should be a company incorporated in India under the Indian Companies Act and having a track record of dealing in mass data in directive media industry for at least 5 years. The most important point should be that the promoters of such a company

should not have been debarred or black listed in their earlier dealings with the Department of Tele-communication with regard to any service provision. They should have a net worth of minimum Rs. four crores with foreign equity limited to maximum 74%.

Location of the call centre: In individual service area to facilitate proper interconnectivity and requirement of operators with local knowledge.

6.15 What selection criteria should be adopted for selection of National Integrated Directory Enquiry Service Provider? Please give your suggestions with reasons.

- (i) **Citizen Consumer& Civic Action Group:** TRAI may decide on the eligibility, selection and entry fee.
- (ii) **Consumer's Association(PA Surendran):** Not applicable , if BSNL / MTNL are authorized
- (iii) **Consumer Care Society:** No comments.
- (iv) **Consumers' Forum:** In our view competitive selection is preferable.
- (v) **Dr. Niranjannath (CPAS):** Let it be determined by DoT & TRAI.
- (vi) **Islampur Ramkrishnapally Rural Welfare Society:** Competitive selection based on a quantitative criterion such as an auction where the highest bidder is awarded the license. In case of more than one license is to be issued in a licensed service area, the second or the next highest bidder(s) can be asked to match the highest bid. This approach is transparent and not time consuming
- (vii) **Orissa Consumers' Association:** By bidding process considering the network the ability/infrastructure net worth etc.
- (viii) **Ramesh Chandra-NCHSEBPL:** Here also a comparative evaluation base approach should be adopted and since there will be two licensees, the competition be there. Only thing is that the system of evaluation should be made transparent as far as possible.
- (ix) **Uphokta Sanrakchhan & Kalyan Samiti:** Selection criteria will be minimum price with best Publication because at low price every subscriber can purchase easily of directory.
- (x) **AUSPI:** Initially only access providers or subsidiaries or companies promoted by access providers may be permitted to provide NIDQS.

There could be four NIDQS operators including one PSU

In case, numbers of applicant are more than four, then auction route may be adopted to select operators.

- (xi) **COAI:** Since, in our view the number of service providers should be limited to two or three, an appropriate selection process like Auction may be considered.
- (xii) **Bharti:** No comments.
- (xiii) **BPL:** The selection should be based on open auction of the licenses. In case more than one licensee is to be issued, all the licensees should be asked to match the highest bid.
- (xiv) **BSNL:** Selection criteria should be based on auction and highest bidder. However, BSNL, which is already providing this service should be permitted

to continue to provide the National Integrated Directory Enquiry Service without going through any bidding process.

(xv) **MTNL:** Same as 6.14.

(xvi) **Reliance:**

- Initially there can be four NIDQS operators.
- The selection should be on the basis of auctioning.
- In case other operators are allowed to enter the NIDQS market then they should be asked to pay the same entry fee paid by access providers

(xvii) **TATA:**

- Initially only access providers or companies promoted by access providers may be permitted to provide NIDQS.
- There could be four NIDQS operators including one PSU
- In case numbers of applicant are more than four then auction route may be adopted to select operators.

(xviii) **Hari Infonet Ltd.:** A Limited Company registered under company act 1956. with sufficient infrastructure or a who are having capabilities to provide sufficient infrastructure within short time period. Having experience of more than 10 years or running domestic inbound call centers in multiple cities. The company who is having knowledge about maintaining large no. of records in database and can handle the same. International call center experience should not be considered at all.

(xix) **Infonxx:**

The tender should identify minimum requirements for obtaining a license including:

- Demonstrable data protection processes including meeting recognized national or international standards such as ISO 0027001 or BS 7799.
- Financial stability to maintain operations for the term of the license.
- Minimum of 5 years in managing Directory Assistance Databases that are in excess of 200M listings.
- A minimum of 5 years of managing Directory Assistance Databases that are multi-carrier and/or multi national in origin.

- Managing directory assistance databases and systems that:
 - Provide for millions of enquiries a day.
 - Provide high levels of accuracy (e.g. where accuracy and completeness is always 95% or above).
 - Provide high-churn directory assistance databases (e.g. systems with more than 100k changes a day).
 - Are updated daily, and where daily updates are applied effectively and accurately at least 95% of the time.
 - Have Telco subscriber information.

- Operating directory assistance in multi-language and multi-locality set-ups
 - Demonstrable experience synchronizing Directory Enquiries databases across multiple locations and facilities
 - The ability to manage directory assistance solutions for multiple competitive Telco vendors (i.e. ability to act neutrally, protectively and discreetly)
 - Extensive experience in managing directory assistance solutions collaboratively with multiple telcos and government agencies
 - The technical knowledge and capacity to store and retrieve data provided by the carriers including the necessary networking connectivity to allow for daily updates from the carriers.
 - The ability to store and retrieve the data both domestically within India and the ability to provide or access international directory information and protect the integrity of the database.
 - The ability to access the information from appropriately authorized or licensed communications entities.
 - That all network, wireline and wireless operators, must use the licensed NIDQS for the storage and retrieval of white page and yellow page directory assistance information.
- (xx) **Infovision Group:** The selection criteria should be:
- * The ability to scale to any volume of inbound calls
 - * Quality of contact centre infrastructure
 - * Technical know how
 - * Access to automation technologies
 - * Years in business
 - * Size of company and related work history
 - * Ability service in multiple Indian languages
- (xxi) **OYPPA:** NIDQS provider should be a company with an established track record in handling mass data processing and dissemination of information in print and online media.

6.16 What should be the entry fee/ the base price applicable for National Integrated Directory Enquiry Service Provider? Please substantiate your answer with reasons.

- (i) **Citizen Consumer& Civic Action Group:** TRAI may decide on the eligibility, selection and entry fee.
- (ii) **Consumer's Association(PA Surendran):** Applicable.
- (iii) **Bharat Jyoti Consumer Advocacy Group:** Yes; 1 crore rupees

- (iv) **Consumer Care Society:** No comments.
- (v) **Consumers' Forum:** Entry fee/base price may be RS.one crore.
- (vi) **Dr. Niranjannath (CPAS):** Let it be determined by DoT & TRAI.
- (vii) **Islampur Ramkrishnapally Rural Welfare Society:** The actual entry fee may be determined in the process of selection, but there should be a base price and it needs to be sufficient. The highest bid received in the auction process will become the actual entry fee.
- (viii) **Ramesh Chandra-NCHSEBPL:** The entry fee should be decided at the time of selection. Since the selection is to be decided on the basis of comparative evaluation, a non-serious party shall automatically be out of consideration. The entry fee should be on higher side, looking to the area of coverage.
- (ix) **Uphokta Sanrakchhan & Kalyan Samiti:** Entry fees shall be determined through 50% of cost of publication to outsider publication (Except BSNL/MTNL/NIDES). And 25% of their entry fees should be refundable in the shape of reward for fare publication. So that, licensee should perform their duty accordingly.
- (x) **AUSPI:** Bare minimum entry fee may be prescribed for NIDQS operator. In case there are more than 4 interested parties the auction may be adopted and entry fee could be the auctioned amount.
- (xi) **COAI:** Entry fee/ base price arrived at through the appropriate selection/ auction process may be applicable.
- (xii) **Bharti:** No comments.
- (xiii) **BPL:** The entry fee may be determined based on the open auction. A suitable minimum reserve price could be determined by the Authority based on whether the licenses are to be issued on service area/regional/national basis.
- (xiv) **BSNL:** Entry fee should be based on the highest auction price received through bid. However, there should not be any entry fees for BSNL since it is already providing the service on national level.
- (xv) **MTNL:** Same as 6.14.
- (xvi) **Reliance:**The entry fee should be decided on the basis of auctioning.
- (xvii) **TATA:** Bare minimum entry fee may be prescribed for NIDQS operator. In case there are more than 4 interested parties the auction may be adopted and entry fee could be the auctioned amount.
- (xviii) **Hari Infonet Ltd.:** Their should entry fee should not be more than 1 lakhs per circle since it is just and domestic inbound call center but DOT should charge a share of revenue generated through the calls. Further experience of the service provider is to be considered more since the job involve lots of knowledge regarding the calls handling software design mass data storage and handling of the same. Routing of calls and handling of the

same from one center to other center in case of disaster and failure of systems. After all it is a public utility service.

- (xix) **Infonxx:** INFONXX recommends a one time entry fee of 100,000 INR. This nominal one time fee is proposed due to the capital intensity of the investment and uncertainty of the marketplace. Any onerous fee structure would make entry in the Indian market prohibitive.
- (xx) **Infovision Group:** We believe that the entry fee should be such that it acts as a deterrent and avoids non-serious participants and ensures a high quality experience for the end consumer of the service. There will be a large marketing cost to create visibility.
- (xxi) **OYPPA:** Rendering of NIDQS service entails establishment of infra-structure with active computing capabilities, maintenance of database, its processing and service delivery through experienced operators. There could be considerable costs involved in start-up and running the service which is to a greater extent dependent upon the volume of database, frequency of updation, ease of connectivity on the service, etc.

Further, the cost depends also on the number of queries and the salary level of operators, capital investment and inflation. Thus, it would be difficult to specify at this stage, in the absence of any data, the base price that can be charged. Ideally this should be left to the market forces to determine. There is no risk in doing this considering dual operator scenario suggested for NIDQS. Thus the service provider could be given a free hand to specify the charge. It is for the consumer to consider the cost and decide whether to avail this service or not. It is understood, in some of the advanced countries, Directory Enquiry Service (known as DA), is charged 3 to 5 times the cost of the normal call. However, as an entry strategy limited to six months from the date of launch of this service, the licensee be permitted to charge Rs.3 per call serviced.

In order to re-coup the part of the cost of the call and utilize the intervening time in the enquiry the service delivery advertisements in jingles can be permitted to be played. There could be a limitation on the number of jingles of not more than 2 of 20 seconds (max) duration each.

6.17 Do you agree with the interconnection proposals mentioned in para 4.7? If not please give your suggestions / additional points with reasons.

- (i) **Citizen Consumer& Civic Action Group:** Yes, we agree with the interconnection proposals mentioned in para 4.7
- (ii) **Consumer's Association(PA Surendran):** Yes
- (iii) **Consumer Care Society:** No comments.
- (iv) **Consumers' Forum:** Yes, we agree with the proposals of interconnection.
- (v) **Dr. Niranjannath (CPAS):** YES.

- (vi) **Islampur Ramkrishnapally Rural Welfare Society:** Yes, I agree with interconnection procedure as described in the para-4.7
- (vii) **Orissa Consumers' Association:** Yes.
- (viii) **Upbhokta Sanrakchhan & Kalyan Samiti:** We are agree with interconnection proposal mentioned in para 4.7.
- (ix) **AUSPI:** AUSPI strongly opposes the interconnection proposal.

Since NIDQS provider will be setting up the service, the cost of interconnection should be borne by the NIDQS Provider.

The Directory enquiry service is not a toll free utility service and therefore access network costs and interconnection costs cannot be subsidized by access service providers. The cost shall have to be borne by NIDQS provider.

The Authority may mandate that the interconnection should be provided to all NIDQS providers on a non-discriminatory basis.

- (x) **COAI:** We are of the view that since NIDQSP is setting up the service; the cost of interconnection should be borne by the Directory Enquiry Service Provider. The cost of interconnection will be an operating cost of the NIDQSP **and this cost can be recovered from the revenues which will accrue from the advertisements and also the call tariffs from the subscribers.**
- (xi) **Bharti:** No comments.
- (xii) **BPL:** No, in our opinion it should be the responsibility of the licensee for providing Directory Enquiry Service to arrange interconnection with other service providers at its own cost. The reasons for our views have already been given above in reply to question 6.13.
- (xiii) **BSNL:** The number of circuits between access providers and NIDQS for inter-connection should be based on the outgoing traffic from access providers to the POP of NIDQS in the LSA. Access provider is not permitted to create its infrastructure beyond its area of operation i.e LSA
- (xiv) **MTNL:** No. In case of new license, licensee should seek the interconnection from the telecom service provider as per the present practice. However, if any telecom service provider gets the new license for any service area, the same will seek the interconnection from the integrated directory service provider.

In case incumbent operator provides the circle level integrated directory enquiry service, existing PoIs with other telecom service providers may be used for this purpose also.

- (xv) **Reliance:**
 - We do not agree with the interconnection proposal of the Authority. Since NIDQS provider will be setting up the service, the cost of interconnection shall have to be borne by the NIDQS Provider.

- The Directory enquiry service is not a toll free utility service and therefore access network costs and interconnection costs shall have to be borne by NIDQS provider.
- The cost of interconnection will be an operating cost of the NIDQSP and access providers cannot fund that.
- The Authority may only mandate that interconnection should be provided to all NIDQS providers on a non-discriminatory basis and the commercials should be allowed to be negotiated by service providers.

(xvi) **TATA:**

- TTL strongly opposes the interconnection proposal.
- Since NIDQS provider will be setting up the service, the cost of interconnection should be borne by the NIDQS Provider.
- The Directory enquiry service is not a toll free utility service and therefore access network costs and interconnection costs cannot be subsidized by access service. The cost shall have to be borne by NIDQS provider.
- The Authority may mandate that the interconnection should be provided to all NIDQS providers on a non-discriminatory basis.

- (xvii) **Hari Infonet Ltd.:** Yes the TRAI should regulate the rates for the local / national inquiry and for yellow pages information with value addition TRAI should only put ceiling on call charges. How ever I would like to suggest brake up it should be as follows for local and National directory service calls e.g. in case if the NIDQS service provider is using BSNL lines for providing services brake up suggested is as follows.

In case of calls coming from other network than BSNL network

NIDQS	45 % Revenue from the calls
BSNL	10 % Revenue from the calls
Other access provider	35 % Revenue from the calls
DOT (Ministry of Telecom)	05 % Revenue from the calls as license fees

Reason is BSNL just carrying the calls from other network which it received at local exchange to NIDQS where as it is responsibility of other access provider to pay out and collect the same from the subscriber of his services where bad debt possibilities are involved and NIDQS should get the highest % because he is running the services and providing the same to the caller by updating data and for investing on infrastructure. And % to DOT for license fees for the first 10 years for the period of license of 15 years

In case of calls coming from BSNL network

NIDQS	50 % Revenue from the calls
BSNL	45 % Revenue from the calls
DOT (Ministry of Telecom)	05 % Revenue from the calls as license fees

In case of calls coming from BSNL network for yellow pages inquiry
 NIDQS 70 % Revenue from the calls

BSNL 20% Revenue from the calls
DOT (Ministry of Telecom) 10 % Revenue from the calls as license fees

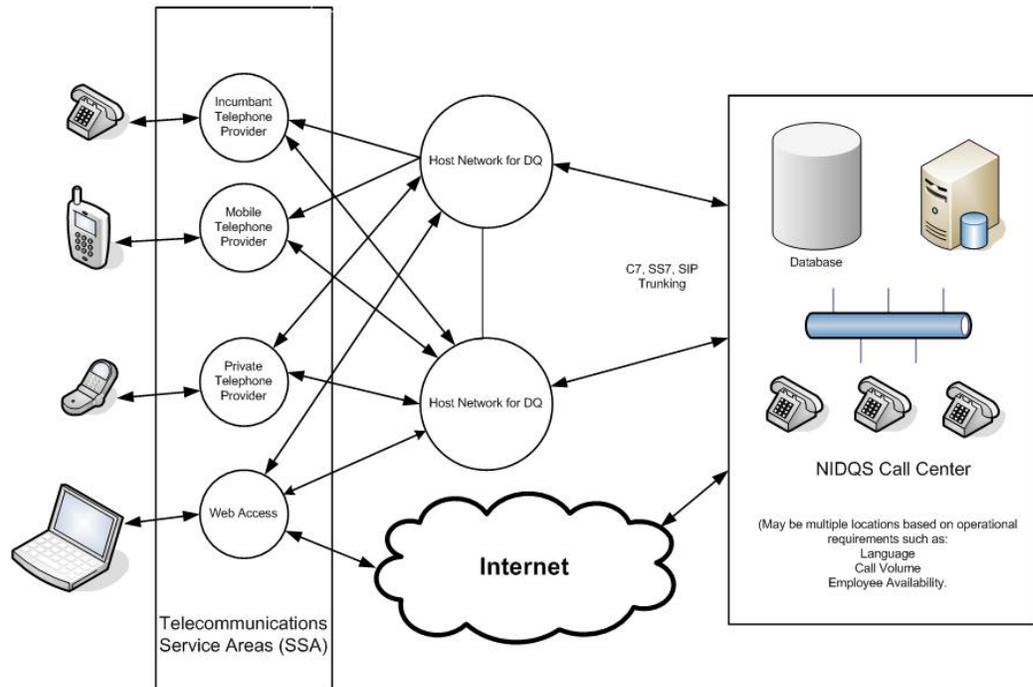
In case of calls coming from other network than BSNL network for yellow pages inquiry

NIDQS 60 % Revenue from the calls
BSNL 10 % Revenue from the calls
Other access provider 20 % Revenue from the calls
DOT (Ministry of Telecom) 10 % Revenue from the calls as license fees

How ever I strongly recommend that premium more than Rs.7 Per minute for any yellow pages information should not to be allowed. How ever access service provider and NIDQS should be allowed to charge fix service charges on per month basis to the callers to provide the services as a value add service for more no of calls and more minutes can be offered

(xviii) **Infonxx:**

The Authority's proposed interconnection arrangement is satisfactory for the NIDQS; however, there are alternatives. One alternative, which we recommend is a connection agreement similar to what INFONXX has entered into in Europe. These agreements allow voice DQ traffic to be routed to a "host" network for completion to the NIDQS. This also includes local DQ traffic which is serviced by the NIDQS because this proposal includes a national database of local, mobile, government and business telephone numbers. In this arrangement, all originating and terminating billing is facilitated by the "host" network with an SS7, C7 or SIP interconnection to the NIDQS. This arrangement is also roughly equivalent to Feature Group D trunking used in the US for call terminations between telecommunications common carriers. This solution is cost effective both for the access provider and the NIDQS. For the access provider, it allows them to route DQ traffic to a "host" network through existing interconnection arrangements such as those used for the long distance network or inter-access carrier terminations. There are substantial cost efficiencies for the NIDQS provider as well, because they can deploy fewer larger call centers to service the DQ market while realizing the extra costs of private line circuits to move traffic from their Service Area POPs to the NIDQS center. Transit solutions, as shown below, should be expressly permitted in the proposed DQ licensing arrangement.



Additionally, Section 4.2.1 of the consultation document references a proposed DQ dialing plan. In an effort to avoid consumer confusion and enable the NIDQS to move forward without the hindrances of legacy services, INFONXX recommends that a simplified 3 digit code be enacted for both national and local DQ services. The licensees should have the option to select their code within the rules of existing local and national dialing plans.

(xix) **Infovision Group:**

Interconnection is a complicated environment for 'business as usual' on the operations front as well as revenue sharing mechanics. We feel there should be a special number series by DoT which are issued to various licensees (eg 118 in the UK and 411 in the US). The licensees, in turn, will market these numbers to end users who can dial these numbers from any phone network.

- (xx) **OYPPA:** Your proposal mentioned in para 4.7 does meet the start-up requirements. It should also be ensured that all access service providers co-operate and work toward the success of NIDQS.

6.18 (a) What are your views on the proposal for tariff as given in para 4.8?
(b) Should the Authority fix the tariff at which consumer can avail local, national / yellow pages directory information? If yes, what should be the basis of that? If not, why?

(c) Any other suggestions / additional points on tariff, if any, with reasons thereof.

- (i) **Citizen Consumer & Civic Action Group:** TRAI may fix the rates at which the NIDQ Services are provided to ensure uniformity in the charges.

For local enquiries it may be considered as a local call, for National enquiry STD charges may be fixed and premium rate may be charged for yellow pages enquiry. However, it is important that the service providers do not make business promotions during such calls made by the consumers.

- (ii) **Consumer's Association (PA Surendran):** OK
- (iii) **Consumer Care Society:** Charging for using NIDQS is fair as it is a value addition. TRAI's views dated May 5, 2005 seems still valid and we agree.
- (iv) **Consumers' Forum:** We argue that all calls within SSA should be free, but charge can be levied for other calls.
- (v) **Dr. Niranjannath (CPAS):** No Tariff is agreeable. Free Service is demanded for the reasons mentioned above.
- (vi) **Islampur Ramkrishnapally Rural Welfare Society:**

(a) TRAI should fix the tariff as per the TRAs order/ regulations / directions issued time to time.

(b) Yes, TRAI should fix the tariff at which consumer can avail local , national / yellow pages directory information. NIDQS enquiry within the local circle can be determine considering it as local call per minute / per three minutes basis. For national and yellow pages enquiry a premium rate can be considered.

(c) No.

- (vii) **Orissa Consumers' Association:**
- (a) It may be adopted at initial stage subject to modification on application.
- (b) Yes, it should be minimal as SPs are charging rental etc. for the landline.
- (viii) **Ramesh Chandra-NCHSEBPL:**
- TRAI should fix the tariff for local, national and yellow page directory, information. Utility from the point of consumer to have a directory information can be the base for fixing the tariff. Of course, the tariff should have three stages.
- (ix) **Upbhokta Sanrakchhan & Kalyan Samiti:** In the consideration of tariff, it is not necessary to formulate separate tariff but we can make minimum price of calls without any tariff in such a way if the call price will be low then public may use maximum their calls.
- (x) **AUSPI:** AUSPI views that Tariffs should be under forbearance as prevalent in other services for the Directory Service provided by service providers.
- (xi) **COAI:** Determination of tariffs should be left to the market forces and tariffs may be on a per minute basis. Policy of tariff forbearance, which has worked well in the telecom sector, should be applied.

- (xii) **Bharti:** The Hon'ble Authority has followed the policy of tariff forbearance, which is extremely successfully in Indian telecom industry and we are of the view that the same policy should also continue for these operators as well. The decision on tariff to be charged should be left to the market forces.
- (xiii) **BPL:**
- (a) We agree with the proposals given in para 4.8. The tariff may be determined by the Directory Enquiry Service provider in consultation with the access providers with whom he will have to share revenues. There could be one tariff for local/regional enquiry on per minute basis. Calls made to other service areas/regions (in case the service is provided on service area/regional basis) should be charged as per applicable NLD tariff and the charges applicable for the enquiry involved i.e. ordinary information/commercial information.
- (b) So long as there is adequate competition for providing the enquiry service, the Authority need not be bothered about fixing the actual tariff for the service which could be determined by the market forces. However, if considered absolutely necessary a ceiling tariff could be prescribed for different types of queries.
- (xiv) **BSNL:** (a) It is understood that the Call Centre of the NIDQS Service Provider will be at one place or maximum four places on zonal basis in India and as such, the Enquiry from a subscriber of an SSA for a local number within the same SSA or outside the SSA is irrelevant thereby charges for local enquiry should be same as for national enquiry. Similarly, the tariff should be the same for information on yellow pages. The call should be charged on per minute basis. The threat that the call could be of a larger duration due to the inefficiency of the Service Provider would be overcome through QOS parameters defined for the service and also through competition. The per minute charges are also justified because practically a subscriber can not specify the details about the enquired party and invites a number of queries for giving him a specific reply.
- (b) Response already given above in 6.18 (a).
- (c) The amount of revenue from the Service should be shared between the Access Service Providers and the NIDQS provider on cost basis as per the utilization of these resources for the provisioning of NIDQS. The settlement should be made on the basis of cumulative traffic over a month.
- (xv) **MTNL:** Tariff should be left to the market forces to decide.
- (xvi) **Reliance:**
- The Directory enquiry tariffs should be regulated **only if** market is not competitive. **We strongly recommend that tariffs should be under forbearance.**

- Forbearance in tariffs push innovations and improvement in quality of service
- The cost structure of a local call and directory enquiry call and ordinary other calls is not same and therefore suggested same charges for local calls and directory enquiry calls is not workable.
- The directory enquiry calls should have a shorter pulse rate of say 1 minute instead of 3 minutes so that customers pay only for duration for which enquiry service is used.

(xvii) **TATA:** TTL believes that Tariffs should be under forbearance as prevalent in other services for the Directory Service provided by service providers.

(xviii) **Hari Infonet Ltd.:**

(a) As mentioned above TRAI must regulate the above tariff proposition as the guide line to settle IUC charge dispute between access providers for all level 1 service not limited to NIDQS.

(b) In the interest of subscriber and government of India TRAI must regulate the tariff for consumer. However before any changes in proposition and revenue share TRAI must consult NIDQS and all access service Provider to put his view on proposed changes and then to decide best in the interest of consumer

(c) As Mentioned above TRAI must regulate the tariff and approve plans for revenue share between access service provider and NIDQS provider for sharing of premium rate service revenue and also approve various plan brought forward by them from time to time.

(xix) **Infonxx:**

The Authority should not fix tariff and call-handing service levels for any services as this risks making the solution unsustainable or poorly tailored to the needs of the marketplace.

If the authority sets the price too low and service requirements too high, then it will be impossible to offer a sustainable service and it will collapse.

Overall the proposal requires a high level of capital investment and substantial risks to ever make a profit, and so it is not a viable investment for the private sector unless the proposed rules are amended to improve flexibility and therefore reduce risk. Given this fact, it is inappropriate for The Authority to have the ability to set price.

By way of comparison, INFONXX operates large scale call center operations in the Philippines (an equivalent economy to India in many ways in terms of cost base) focused entirely on Directory Enquiries, and only offered in one language. Our most efficient cost price per call is multiples higher than the current local call price identified as an option in the consultation.

There are no valid business models that we have developed for India that enable a widely available Directory Enquiries voice-based solution today in India for the price of a local call, even when allowing for advertiser subsidies and contributions from Premium Rate services.

INFONXX understands that setting a higher price than a local call may make services too expensive for many Indians. In order to address this, INFONXX has considered several solutions to address accessibility, whilst enabling progress towards voice-based solutions where possible, and as soon as possible.

Below are examples of some of the solutions we have considered:

1) Ad-funded services

These can contribute to the running costs of the service, but these typically have a higher cost base than a local call when offered in a call center environment.

The free ad-funded yellow-pages style services cannot be seen as equivalent to the proposals to the Authority for several reasons:

- a) In India these services only operate in a handful of Metro areas, so in effect they have purposely selected the only areas they think they can viably offer service due to a critical mass of advertisers and high value customers. They do not operate a national database, nor do they serve rural localities, nor is it likely to be profitable for them to do so.
- b) The current services do not have fixed Quality of Service requirements and there can be significantly varied quality of service depending on when you call. This allows them to have a lower cost base for offering the service and contravenes the recommendations discussed so far by The Authority, so it cannot be considered to be a similar situation. Should the Authority consider a scenario with no, (or very low) quality of service thresholds for call handling, then this scenario would be more comparable.
- c) These services typically request extensive details from customers to share with advertisers. Again, this does not appear to be a consideration in the current proposals from the Authority and would not be comparable, as this data holds the highest level of value for getting revenue from advertisers to support the service costs.

Under the scenarios above, it is clear that the Authority would need to remove Quality of Service parameters and/or allow customer details to be collected for advertising for ad-funded models to be considered as a way to help subsidize the cost of running a Voice Directory Enquiries service for India. Even then, it is unlikely it could be a substitute service that would offer a database for all of India and offering service throughout India. Even in the US, where ad rates are much higher, we believe there are no national profitable (and hence sustainable) free Directory Enquiries Services.

INFONXX does recommend that Quality of Service thresholds are set very low or not at all for the basic service (in terms of call handling), to allow advertiser services to be offered where possible to contribute to the costs of running a voice DA service.

2) A service paid for by Network Operators and the Authority:

This solution has been adopted in many countries. This typically results in Network Operators investing as little as possible in enabling such a service. If a good Directory exists at the time that this has been mandated, then sometimes it continues, but there is not usually new investment in the database or service as it becomes a pure cost-center, rather than an area where investment can lead to growth and profit.

In India, the standard of the databases and Directory Enquiries Services today (such as 197) means that added, sustained investment is essential if India wants to get a national, reliable, multi-network, quality Directory Enquiries system of any kind. Adopting this solution (a service paid for by Network Operators and the Authority) would likely mean that no nationally available service with any quality data would become available. In addition the services would likely continue to be specific to the customers of each network operator, and limited in utility. It would also be an unnecessary drain on the resources of Network Operators when there are many proven models for offering services without network operators bearing this financial burden.

3) A basic service subsidized by a premium rate service

The current service envisioned by the Authority has limited differentiation between the basic service and the premium service. This means it is unclear that the premium service can have widespread appeal, though clearly improved Quality of Service can be a key differentiator.

The more similar the services need to be, the smaller the market for the Premium Service will be. Currently there are too many requirements for the basic service to include and too little freedom for innovation in service and pricing for the Premium service, meaning that risk is high and certainty of volume on the Premium service is low.

It is wholly inappropriate for the Authority to regulate and set pricing for this service in any way. By doing so, the Authority would be discriminating against this service compared to other Premium Rate services that exist today in India. In effect, the Authority would be creating a scenario where there is clearly more freedom to innovate on other services, and so those services are likely to attract private investment instead of the premium Directory Enquiries Service, as other premium rate services (non Directory Enquiries) will be a less risky investments with more potential.

The fact that the Authority does not set or control the price should not be a concern as it will be in the interests of the service provider to find a viable

balance between service levels, service offerings and price. If the service provider sets the price too high, people will not use the service and so it will not be viable. If the Service Provider does not offer an innovative and quality service, then again, consumers won't use it, so it won't be viable. It is the nature of having a private investment service provider that they will have to find this balance quickly and effectively and innovate to survive and succeed. This will not be possible if the Authority is prescriptive in price setting this service or defining the service limitations. In addition, private investment will be discouraged from investing at all.

INFONXX recommends that the Authority play no role in establishing the price of the Premium Service or defining the maximum service offering, except where there are clear consumer concerns (e.g. preventing the service from offering sex lines or other types of service that are commonly prohibited for consumer protection for key services in India).

INFONXX also believes that the size of the Premium Rate market is so small in India and undeveloped for this service or equivalents, that there is no evidence that a Premium rate Service can deliver significant profits, let alone enough to subsidize the costs of the basic service.

4) An automated service:

Automated voice platforms have been improving in recent years, but are still not nearly as accurate as alternatives such as human operated services, except when used in conjunction with human operators. In addition, the cost of automated services is still considerably higher than the proposed DQ cost of a local call. For example, the typical cost range for deployments using 1 language only (and using English which is the language that has been best optimized for automation by most companies, and hence is typically the cheapest to deploy) is 2x to 3x the cost of a local call in India. Due to INFONXX's experience with DQ automation in its operating countries, it does not believe this is a viable alternative for India at this time.

5) Launch nationally available services to enable benefits of national database - with requirement for a minimum of one service type in the first 12 months (web / wap / SMS / voice). Evolve to add additional services as fast as the market will support it at a later time.

This solution enables the benefits of the national database to be made available rapidly and that will form the bedrock for all services. It enables more expensive investments such as voice-based services to be developed in parallel with advertiser revenue models, automation and premium (e.g. Yellow pages) products to help support the added investment costs.

INFONXX believes that this is the only viable option as it can achieve a national database, widely available, with manageable risk and investment levels, whilst creating an environment that enables innovation and call-based solutions to be offered as quickly as people can establish sustainable solutions.

This solution focuses in stages on the developments necessary, and so enables a less risky investment scenario. The current solutions outlined by the Authority add up to enormous levels of risk and investment, with complete uncertainty of financial return, and with restrictive regulatory rules that price cap basic services at a level below cost, and which constrain the opportunities that can be gained elsewhere in the market from Premium service pricing etc.

This solution proposed by INFONXX seeks to address the particular scenario in India so that it focuses in stages on the key needs of India, whilst also enabling an investment scenario that can progress as quickly, and enables multiple companies to have scenarios that they may be willing to quickly innovate and accelerate the service implementation in India in a financially sustainable manner.

The steps are:

a) Create a scenario where private entities would desire to create and manage a good quality national database, and where the risk is manageable.

Our solution creates a scenario where web and wap services and SMS services could immediately develop in the first 12 months with modest pricing or free ad-funded services.

By offering a web / wap and SMS solution, the accessibility criteria should be addressed so that benefits can be widely and rapidly experienced throughout India. By removing the requirement for a voice-based solution from the first phases, it reduces the investment costs and risks and so maximizes the chances of a good, sustainable solution to be available for all India. It also allows time for further research and testing in an unproven marketplace before the deployment of enormous additional capital and effort by the Licensee and Network Operators on national network infrastructure for interconnection and call centers. This timetable needs flexibility to avoid significant waste of capital on wrong-sizing for different needs and geographies, and to enable staged geographical rollouts whilst minimizing investment risk (and hence pricing pressure).

b) Use this initial solution as a foundation to enable other services (such as voice-based services).

This database and any web-based solution could then be used as a foundation for the Licensee and partners and competitors for them to offer voice-based solutions, paper-based directories, or any other innovative solutions. But, most importantly, this can happen when any company feels that they have a proven business case, whilst enabling the cheaper, lower cost solutions to happen immediately. This enables an environment for innovation, whilst getting accessibility and quality of service improved at the start, but recognizing that a voice-based solution may take longer to develop, and be properly funded and priced appropriately.

c) Allow Premium Rate services and other services to be offered based on this data:

This maximizes the opportunities for companies to develop whatever services India desires and would use, when the market is ready for it and at pricing that is affordable for that target market. The greater the investment possibilities and flexibilities, the more likely companies are to innovate and invest.

INFONXX believes the TRAI current proposed solution is simply too great a commitment, with too much risk and initial leap, and requires too high a level of investment with suggested prices set below cost price.

If the current proposals are adopted INFONXX believes that India risks finding no genuinely capable Directory Enquiries providers (including INFONXX) apply for this license. More importantly, we believe that any company that does apply for it will find that they are proposing unsustainable solutions and will likely go bankrupt and/or not be able to offer the solutions for any significant time, if at all. We further believe that the licensee, after having acquired a license after acceding to the terms outlined by the TRAI, will more than likely come back to the TRAI and recommend each of the actions we outlined in this Response but companies such as INFONXX will not have bid and not have received a license.

INFONXX recommends starting with a web / wap and basic SMS DQ service and then migrating to voice as market conditions allow.

Any other suggestions / additional points on tariff, if any, with reasons thereof.

As previously stated, INFONXX recommends starting with a basic test SMS, web / wap DQ service and then migrating to voice as market conditions allow. Tariffs may or may not be applicable to directory services provided by SMS, WAP or Web.

(xx) **Infovision Group:** There should be additional tariff for the following value added services:

- * SMS delivery option
- * Call completion service (almost 10% of customers request it in UK)
- * Driving directions
- * Movie Listings
- * Weather

(xxi) **OYPPA:** (a) The proposal for tariff mentioned in 4.8 are agreeable in principle. However, considering the cost of the service, even for a local

enquiry there should be a premium rate which could be little less than premium charged for the Yellow Pages and other product / service enquiry services. It could be 60% of the premium for national and Yellow Pages enquiry.

(b). *The authority should fix the tariff in such a manner that the consumer can avail local/national/yellow pages directory information.*

The basis of fixation of the tariff could be:

i) *Encourage entry of players with adequate infrastructure and service capability.*

ii) *Recover at least 2/3rd cost of the service with the tariff charged to the consumer. Balance 1/3rd to be recovered by the licensee by other means including playing of jingles.*

iii) *Generate adequate surplus to upgrade the service from time to time with provision for incorporation of latest technology in data sourcing and service rendering to the consumer.*

iv) *Within the upper limited specified by the Authorities, the licensee can, without compromising on the standard and quality of the service reduce the tariff charged to the consumer.*

(c). *The tariff fixed by the authorities should be periodically reviewed, say every year taking into account inter-area service delivery cost, induction of latest technology, volume of database handled and customer feedback on the services rendered and charges levied so far.*

6.19 Do you agree with the revenue share proposals mentioned in para 4.9? If not, please give reasons thereof and any other suggestions / additional points with reasons.

- (i) **Citizen Consumer& Civic Action Group:** TRAI may determine the revenue sharing.
- (ii) **Consumer's Association(PA Surendran):** OK
- (iii) **Consumer Care Society:** No comments.
- (iv) **Consumers' Forum:** Yes, we agree for the proposals of revenue sharing.
- (v) **Dr. Niranjannath (CPAS):** USAGE OF NET WORK is part of the obligation none the part of SPs. No share is justified.
- (vi) **Islampur Ramkrishnapally Rural Welfare Society:** Yes, I agree with revenue share proposals mentioned in para- 4.9.
- (vii) **Orissa Consumers' Association:** Yes.
- (viii) **Ramesh Chandra-NCHSEBPL:** To avoid any conflict between Access Service Provider and National Integrated Directory Enquiry Service Provider

- (NIDESP), it would be better, if TRAI fixes the revenue share in between two from time to time.
- (ix) **Upbhokta Sanrakchhan & Kalyan Samiti:** We are agree with the revenue share proposal mentioned in para 4.9.
- (x) **AUSPI:** AUSPI suggests that revenue share wherever applicable should be decided mutually by the concerned service providers.
- (xi) **COAI:** The revenue share between NIDQSP and the access service should be left primarily to the mutual agreement between parties, while the Authority may ensure that same is done on a non-discriminative basis.
- (xii) **Bharti:** The revenue share between NIDQSP and the access service should be left to the mutual agreement between parties.
- (xiii) **BPL:** We agree with the proposals at para 4.9 of the consultation paper. The revenue sharing should be decided by mutual negotiation between the parties involved on non discriminatory basis.
- (xiv) **BSNL:** Refer 6.18 (c) above.
- (xv) **MTNL:** The revenue share can be as mutually agreed between circle level integrated directory enquiry service provider and the access service provider.
- (xvi) **Reliance:**
- We agre with the Authority’s on revenue share proposal. The revenue share between NIDQSP and the access service should be left to the mutual agreement between parties.
 - The Authority may also specify that access services are provided by service providers on a non-discriminatory basis to all NIDQS operators.
- (xvii) **TATA:** TTL suggests that revenue share wherever applicable should be decided mutually by the concerned service providers.
- (xviii) **Hari Infonet Ltd.:** As in 6.17
- (xix) **Infonxx:** INFONXX agrees with components of the revenue share paragraph (4.9). It is imperative for the regulator to establish the principle standard of ‘cost- orientation’ as the method to be used by the incumbents in establishing the charges to be levied for providing the component services to NIDQS, including billing, as well as mobile and landline origination and termination. The principle of Network Operators only being able to recover costs is essential to make this service viable. The company would prefer the methodology used in Europe and this is in concert with the proposed interconnect arrangement (para 6.17). That is, NIDQS would engage with the carriers to create a “host” carrier environment. This “host” carrier would arrange the interconnection with all the carriers serving the Indian marketplace. The NIDQS would create a commercial arrangement with the host carrier to transit the call and bill the end consumer. In exchange for this service, the “host” would charge the NIDQS a retention fee for the performance of these services. Markets like the UK allow the host network

provider to retain 1% of the call charge. The NIDQS also creates Service Level Agreements with the carrier for the performance of the transit and billing services. The NIDQS sets consumer pricing and retains direct contact with the consumer through itemized billing on the telephone bill as well as direct to consumer advertising.

- (xx) **Infovision Group:** We agree.
- (xxi) **OYPPA:** Going by the number of total telephone connections services and the obligations of the access service provider (TELCO) to every consumer (to make available the updated directory database), it is the responsibility of the access service provider which is being served by the NIDQSP. Further the NIDQSP has to incur huge cost for maintenance and delivery of information which would have been otherwise incurred by the access service provider. Therefore all the revenue collected by access service provider should be passed on to NIDQS within 15 days of receipt of the amount.

This service has to be differentiated from the Value Added Service (VAS) which is essentially of commercial nature, i.e. provision of content according to the requirements of the consumer. However directory enquiry service is an integral part of the telecommunication service which till date is provided free of cost by BSNL/MTNL.

Therefore the TELCOs cannot make any claims for a share of the revenue. Only incidental/administrative charges incurred in collection of revenue, maintenance of records and delivery of the revenue to NIDQS can be collected, subject to a cap of 2% of the revenue collected.

6.20 What are your views on the proposal for Data Sharing and Data Security, including seeking option from consumers, as given in para 4.10? Any other suggestions / additional points, if any, with reasons thereof.

- (i) **Citizen Consumer& Civic Action Group:** We agree with the proposal for data sharing and data security including seeking option from consumers as given in para 4.10.
- (ii) **Consumer's Association(PA Surendran):** Option can be obtain from the Consumers
- (iii) **Consumer Care Society:** Yes, reasonable and agreed. Let it be light touch and left to TRAI.
- (iv) **Consumers' Forum:** Proposal are sufficient.
- (v) **Dr. Niranjannath (CPAS):** Revisiting is needed.
- (vi) **Islampur Ramkrishnapally Rural Welfare Society:** Data sharing and data security may be as depicted in Paras **2.4.8** in the consultation paper
- (vii) **Orissa Consumers' Association:** Those who want to opt out they may not be listed but all others.
- (viii) **Upphokta Sanrakchhan & Kalyan Samiti:** There should be security of data Sharing and data security according to customer demand e.g area wise, name and address with full details of old Number.

- (ix) **AUSPI:** AUSPI strongly opposes the Opt out approach for the telephone directories for mobile subscribers. We firmly believe that it should be only opt-in approach for mobile subscribers.

Privacy is one of the major issue concerning telephone directories. There is high level of public support for strong privacy safeguards.

Privacy issues are more applicable to cellular subscribers as they take their cellular phones everywhere they go, making the cell phones more susceptible for disruption

The Unsolicited Commercial Calls Regulation implementation is still in early stages and therefore all consumers cannot be easily persuaded so that cellular directories can be administered fairly without affecting their rights to privacy.

To safeguard privacy, the NIDQS license should have clauses to debar NIDQS operator from publishing cellular directories, selling directory data to third parties including telemarketers and prohibition from bulk disclosure of numbers except if required by security agencies or under the law.

The directory information in respect of cellular subscribers should be narrowed down to include only the name and telephone number that also as an opt-in option only. The option should be given to subscribers to decide inclusion of information relating to address in the directory.

- (x) **COAI:**
COAI would like to strongly submit that **“opt in” approach should be followed for mobile subscribers. This has been the consistent stand of COAI in the past as well and the same has also been accepted by the DoT.** DoT in its letter dated October 16, 2007 to the Authority has stated that for the purpose of Directory Enquiry Service, the **“opt in”** approach should be adopted for mobile subscribers.

In the Consultation Paper, the Hon’ble Authority has proposed that for the mobile industry, the approach of “Opt-Out” may now be considered. In order to support its argument, the Hon’ble Authority has given the following reasons listed below as **(a)** to **(e)** on which we would like to respectfully submit as under:

(a) regulation is already in place to tackle unsolicited commercial calls;

As per our understanding, the suggestion of change in approach from “Opt-in” to “Opt-Out” has been driven from this fact that the regulation on Unsolicited Commercial Communications are in place and the same is adequate to address the concerns of individual’s privacy infringement.

The Hon’ble Authority would appreciate that presently, for the mobile industry, the issue of privacy of subscribers is of paramount and critical importance and cannot compromised upon. Already the industry as well as

the Hon'ble Authority is grappling with the all important and sensitive issue of telemarketing calls.

While, we agree that the regulation on Unsolicited Commercial Communications is in place, however, the Hon'ble Authority will also appreciate this fact that the implementation of this regulation is still in nascent stage and the system is evolving.

The Authority would appreciate that **the security and privacy issues of an individual** is much larger than the issue of nuisance of unsolicited commercial calls and the existing regulation on UCC may not be adequate to fully address such critical issues. Once the data of the subscriber is in public domain the subscriber may also end up receiving harassment call and the security of the subscriber may be compromised upon.

Thus, once a mobile number is listed on NIDQS, it may not be possible for the service provider to protect the privacy of the subscriber and ensure that the subscriber does not receive unsolicited calls. The mobile subscriber may also end up receiving unwanted calls from small unorganized establishments, like small shops, coaching centers etc. as this particular segment will use this data to enhance their business.

In view of the above, the **availability of personal details of an individual in the public domain is an extremely critical issue. It would be more appropriate that this decision is taken by an individual as to whether he wants to share his/her personal details in the public domain after looking into the implications of security and privacy** and thus, the approach of **“Opt-In”** would be most suitable.

It is pertinent to note that in earlier instances, **the approach of “Opt-In” has successfully been implemented in:**

- i. **NDNC registry**, the Industry is following the Opt-In route wherein the mobile subscriber is contacting his service provider by stating that he or she does not wish to receive tele-marketing calls and his / her mobile number should be registered or listed on NDNC.
- ii. **The Value Added Services** are being subscribed with the explicit consent of the subscriber, which means that whosoever is keen to subscriber for any Value Added Service, he conveys its interest through various methods rather than he / she conveys his/her disinterest.

Under these circumstances, we believe that **the approach of “Opt-in” is the most appropriate** for the Mobile Industry, which has also been agreed by Department of Telecommunications.

(b) there will not be printed directory for cellular mobile service;

While, we agree that there will not be any printed directory for cellular mobile services, however, the same cannot be a ground of changing the earlier agreed approach of “Opt-In” to “Opt-Out”. The growth in Fixed Line Services has almost stagnated whereas the mobile Industry is witnessing exponential growth, with an average monthly addition of 7-8 million subscribers. Keeping in view the exponential growth of mobile services and a huge churn, it was never feasible to come out with a printed telephone directory irrespective of whichever approach is taken.

(c) the directory services are now being thought of as a chargeable service;

While, the directory services will be chargeable service, however, from a customer point of view, the chances of privacy infringement will still be high in case, the approach of “Opt-Out” is taken.

Thus, the chargeable service may not be a constraint to infringe any person’s privacy and will not be an effective deterrent.

(d) cellular mobile service is now being used as a substitutable service to fixed line telephones; and

Although the cellular mobile service is now being used as a substitutable service to fixed line telephones, the same is due to its distinctive benefits of mobile phones over fixed line phones.

But it must be noted that in spite of the above, the privacy and security concerns are of critical importance and remain the same for both fixed line as well as mobile. And hence this cannot be taken as a ground for considering the approach of “Opt-out” for mobile.

(e) the large number of self employed people such as carpenters, electricians, plumbers etc. and small time vendors are able to afford the mobile phone service and also rural population is increasingly adopting to mobile phones and that they would like to have their listings for directory

We believe that **in case, the approach of “Opt-In” is adopted, the above objective listed by the Authority can be achieved in a effective manner.** A professional who is keen to publicize his / her services to other mobile customers, can use the opt-in approach.

The “Opt-In” approach will ensure that the after paying the requisite service charge, such a professional can have his number listed in the Directory Enquiry. As a result the telecom subscribers will be able to get the filtered details of only those professionals, who are keen to publicize or enhance their services through this mechanism.

And the majority of the mobile subscribers who wish to protect their privacy can ensure that their details are not made available in the public domain.

Hence “Opt-in” approach is a balanced approach which addresses all the concerns – meets the requirement of those individuals who wish to publicize their services without exposing the entire fraternity of telecom subscribers who wish to protect their privacy.

In view of the above, we once again reiterate that for the mobile services, the approach of “Opt-In” should only be adopted by the Industry as:

1. It will remove any possibility to infringement of any individual’s privacy and security concerns, which is the most sensitive issue in today’s scenario.
2. It will be in line with the earlier successful practices adopted by the Hon’ble Authority where the subscriber gives its explicit consent for subscription of any value added service or approach the operator to include his name for NDNC registry.
3. The “Opt-In” approach will not affect those professionals, who wish to include their mobile numbers for their business purposes. They can easily subscribe their names through “Opt-In” approach. Moreover, this approach will enhance the quality of the data as the customer will be able to obtain the services of those professionals, who are keen to provide their professional services through this mechanism.

In light of the above, we suggest that in line with the decision of DoT, the Opt-In approach should be recommended by the Hon’ble Authority for the mobile services. We strongly believe that the above is **the most effective approach to ensure subscriber privacy and is also in line with the initiative of the industry as well as the Authority to curb the menace of tele-marketing calls.**

(xi) **Bharti:**

We would like to strongly submit that **“opt in” approach should be followed for mobile subscribers. This has been the consistent stand of the Mobile Industry in the past as well and the same has also been accepted by Department of Telecommunications (the Department).** The Department in its letter dated October 16, 2007 to the Authority has stated that for the purpose of Directory Enquiry Service, the **“opt in”** approach should be adopted for mobile subscribers.

In the Consultation Paper, the Hon’ble Authority has proposed that for the mobile industry, the approach of “Opt-Out” may now be considered. In order to support its argument, the Hon’ble Authority has given the following reasons listed below as (a) to (e) on which we would like to respectfully submit as under:

(a) regulation is already in place to tackle unsolicited commercial calls;

As per our understanding, the suggestion of change in approach from “Opt-in” to “Opt-Out” has primary been driven from this fact that the regulation

on Unsolicited Commercial Communications is in place and the same is adequate to address the concerns of individual's privacy infringement.

However, we are of the view that:-

i. The objective of the regulation of Unsolicited Commercial Calls is to ensure that an individual do not receive the unwanted commercial calls. Today, a person, who is not keen to receive the unwanted commercial calls, subscribes his/her name in DNC registry.

ii. We believe that the scope of this regulation is limited i.e. to ensure that "an individual do not receive unsolicited commercial calls" and the same may not be viewed as a remedy to entire privacy and security issues of an individual. The Hon'ble Authority would appreciate that the security and privacy issues of an individual is much larger than the issue of nuisance of unsolicited commercial calls and the existing regulation on UCC may not be adequate to fully address such critical issues.

iii. Moreover, once a mobile number is listed on NIDQS, it would be difficult to have any control on the privacy and security issues of an individual. Thus, the availability of personal details of an individual in the public domain will be extremely critical and accordingly, it would be more appropriate that this decision is taken by an individual only whether he wants to share his/her personal details in the public domain after looking into the implications of security and privacy and thus, the approach of "**Opt-In**" would be more appropriate.

It is pertinent to note that in earlier instances, **the approach of "Opt-In" has successfully been implemented in:**

ii. **NDNC registry**, the Industry is following the Opt-In route wherein the mobile subscriber is contacting his service provider by stating that he or she does not wish to receive tele-marketing calls and his / her mobile number should be registered or listed on NDNC.

ii. **The Value Added Services** are being subscribed with the explicit consent of the subscriber, which means that whosoever is keen to subscribe for any Value Added Service, he conveys its interest through various methods rather than he / she conveys his/her disinterest.

Under these circumstances, we believe that the approach of "Opt-in" is the most appropriate for the Mobile Industry, which has also been agreed by the Department.

(b) there will not be printed directory for cellular mobile service;

We are of the view that the privacy and security issues of an individual should not be determined upon the availability or unavailability of a printed telephone directory. While, the Hon'ble Authority may not be insisting for a

printed telephone directory, however, the personal details of an individual will still be in the public domain.

Thus, the issue of printed telephone directory has no linkage with the privacy and security issues of an individual and the unavailability of a printed telephone directory cannot be construed as a reason to place the entire subscriber data of the telecom subscribers.

(c) the directory services are now being thought of as a chargeable service;

While, the directory services will be chargeable services, however, from a customer point of view, the chances of privacy infringement will still be high in case, the approach of “Opt-Out” is taken.

Thus, the chargeable service may not be a constraint to infringe any person’s privacy and will not be an effective deterrent.

(d) cellular mobile service is now being used as a substitutable service to fixed line telephones; and

As stated above, the privacy and security issues are the paramount and the same should not be compromised on any aspect. We strongly believe that for fixed line as well as for mobile services, the approach of “opt-In” should be adopted and on the security and privacy issues, no distinction should be maintained.

Moreover, mobile service is of more a person to person communication device and the exponential growth in this service is due to its distinctive benefits over fixed line services and accordingly, the same may not be viewed as a reason to place the entire subscriber data in public domain, without taking into account other critical issues.

(e) the large number of self employed people such as carpenters, electricians, plumbers etc. and small time vendors are able to afford the mobile phone service and also rural population is increasingly adopting to mobile phones and that they would like to have their listings for directory

We believe that **in case, the approach of “Opt-In” is adopted; the above objective can be achieved in much better manner.** While, undoubtedly, the people would like to share their mobile numbers and other details in public domain for commercial gains, however, we believe that the number of such subscribers is minuscule. It would be inappropriate to expose the entire fraternity of subscribers to meet the specific need of limited subscribers.

The approach of “Opt-In” will ensure that the after paying the requisite service charge, the customer is able to get the filtered details of those

diminutive professionals, who are keen to publicize their services and / or provide their services through this instrument.

In view of the above, we once again reiterate that for the mobile services, the approach of **“Opt-In”** should only be adopted by the Industry as:

4. The issue of privacy and security of an individual is much large than the issue of Unsolicited Commercial Communications and both the issues should not be viewed as **One Issue. It would be inappropriate to view the regulation on UCC as a remedy to all security and privacy issues of an individual.**

5. The approach of Opt-In has been successful in earlier occasions as well and the same should be maintained.

6. This approach will meet the requirement of professionals, who are in minuscule numbers, to exploit this mechanism for professionals gain rather than exposing the entire fraternity of the professionals, who would not like to exercise this instrument.

In light of the above, we suggest that in line with the decision of DoT, the Opt-In approach should be recommended by the Hon'ble Authority for the mobile services. We strongly believe that the above is **the most effective approach to address the subscriber privacy as well as security.**

- (xii) **BPL:** We agree with the suggestions regarding data sharing. However, it should be the responsibility of the NIDQS providers to ensure that the data pertaining to one access provider is not shared with other competitors for providing access service in the same service area.
- (xiii) **BSNL:** This is very vital and important. Adequate safety mechanism should be in place to maintain the secrecy and confidentiality of the data. For NIDQS, BSNL is in favour of Opt-out approach for seeking options from the subscribers.
- (xiv) **MTNL:** Opt-out approach for fixed line customers as well as mobile customers may be adopted. Customers may request through SMS and call centers. They may also send their request for exclusion of their number from circle level directory enquiry services on line or in writing.

Circle directory enquiry service provider should update the data on quarterly basis after receiving the same from the access service providers. The directory enquiry service database should also be accessible from the website of the directory enquiry service provider.

In addition to the database for the customers who have not opted out, circle directory enquiry service provider should also maintain the database for all the customers who do not want their name and telephone or mobile number in directory service in the hidden format so that the same can be made available to the security agencies.

(xv) **Reliance:**

- We have strong reservation to the ‘Opt-out’ approach for listing of mobile subscribers in national directory.
- Privacy issues are more applicable to cellular subscribers as they take their cellular phones everywhere they go, making the cell phones more susceptible for disruption in contexts where wireline phones cannot reach.
- Privacy is one of the major issue concerning telephone directories. From our experience of unsolicited commercial calls it is clear that there is very high level of public support for strong privacy safeguards.
- The implementation of Unsolicited Commercial Calls Regulation is still in early stages and all consumers cannot be easily persuaded that cellular directories can be administered fairly without affecting their rights to privacy.
- The directory information in respect cellular subscribers should be narrowed down to include only the name and telephone number.
- The option should be given to subscribers to decide inclusion of information relating to address in the directory.
- The license agreement for NIDQS should have clause like prohibition of bulk disclosure of directory information except when required by security agencies or under the law.

(xvi) **TATA:**

- TTL firmly believe that it should be **only Opt-in** approach for Mobile subscribers.
- Privacy is one of the major issue concerning telephone directories. There is high level of public support for strong privacy safeguards.
- Privacy issues are more applicable to cellular subscribers as they take their cellular phones everywhere they go, making the cell phones more susceptible for disruption
- The Unsolicited Commercial Calls Regulation implementation is still in early stages and therefore all consumers cannot be easily persuaded that cellular directories can be administered fairly without affecting their rights to privacy.
- To safeguard privacy, the NIDQS license should have clauses to debar NIDQS operator from publishing cellular directories, selling directory data to third parties including telemarketers and prohibition from bulk disclosure of numbers except if required by security agencies or under the law.
 - There should be a hefty penalty levied on the authorized agency for violation of the data security measures. There must be a independent bi-annual audit conducted to verify adequacy of their data security measures.
- The directory information in respect of cellular subscribers should be narrowed down to include only the name and telephone number and that also as an opt-in option only. The option should be given to subscribers to decide inclusion of information relating to address in the directory.

(xvii) **Hari Infonet Ltd.:** The proposal for data sharing and data security I would like to say it should be a integrated network among all operators and

hence the data will travel via net and their should be not be worries for sharing data as DQ data is not a religious data. And does not show the revenue generated from each subscribers. Opt out and opt in approach is fine and I appreciate the same, How ever the mobile no should be available via DQ services only opt out subscriber should be left out..

(xviii) **Infonxx:**

INFONXX is in agreement with the data sharing and data security points as proposed. INFONXX is in strong agreement that the conditions discussed in section 4.10.1, specifically both landline and mobile information be an “**opt out**” arrangement. INFONXX recommends that Section 4.10 be reviewed for consistency in proposing the “**opt out**” approach to the NIDQS database. All Users should be initially entered into the NDAD. It is imperative for the NDAD to be an OPT OUT database to ensure that the quantity and quality of the database is utilized to the fullest degree possible. If the NDAD is an OPT IN database, both carriers and users will not have the motivation to enter their information thereby reducing the information in the NDAD and making it substantially less usable and less transformational in insuring India’s economic growth and advancement in the information age.

Since over 50% of those responding to the survey noted their willingness to be included in the database, and since greater participation will significantly enhance the economic impact of the database, mandating an OPT OUT database is an important measure for the TRAI to adopt. Additional privacy measures can be offered to provide consumers additional privacy protection.

Moreover, it is imperative that the NDAD be hosted centrally with the NIDQS. Data feeds would be given daily by the Network Operators via an FTP site or other agreed to method. This will ensure data integrity as well as provide for a more efficient infrastructure.

(xix) **Infovision Group:**

Security of customer details is critical to this activity. Privacy issues such as Do No Call registration and "ex directory" numbers have to be taken into consideration while devising the security framework for this service. We recommend central warehousing of information with agencies such as NIC with various telecom operators sending updated customer details on a periodic basis. Directory Enquiry Service providers can be given access to this updated and consolidated databank using Secure connectivity methods such as Encryption/VPN etc. This access is only on a read only basis to ensure that sanity of database is maintained. Please refer to illustration in 6.12(b).

Land line customers should have an opt out option, and mobile customers should have an opt in option for privacy reasons.

(xx) **OYPPA:** The proposals made out by the authority in the recommendations of May 05 giving the hypothesis on which such proposals were made still holds good. A very large number of fixed line subscribers particularly in the

SME, Tiny and Cottage industry sector and Professions rely solely on the cellular phones for soliciting business and maintaining contacts.

Considering the **environmental** angle and the urgency to save on the galloping fossil fuel consumption in the economy, Government should take proactive steps to cut down on physical activities, burning of petrol/diesel and encourage 100% use of communication network and devices for maintaining contacts and carrying on bulk of the commercial transaction. In fact many companies have started permitting employees to operate from home with the broad-band capable of converting the home into a virtual office.

Extending this concept and with proper education and also considering the regulations already in place to tackle unsolicited commercial calls, the authority should specify that for NIDQS all landline and circular phone data should be transmitted by the TELCOs to the NIDQS service providers. The telecom subscriber however, has an option, at any point of time, to have his entry delisted from the NIDQS database by sending a communication to his service provider or NIDQS operator.

We re-iterate that inclusion of SME, Tiny industries, Artisans, self employed data in the NIDQS database would empower them and help them in advancing their business interest apart from their data becoming easily available to thousands of consumers seeking their data.

- 6.21 (a) Should there be any licence fees? If so, enumerate the factors that should be taken into account for determining the license fee. What should be the level of license fee?**
(b) Should minimum amount of license fee be specified?

- (i) **Citizen Consumer& Civic Action Group:** TRAI may decide on the same
- (ii) **Consumer's Association(PA Surendran):** License fee should be specified.
- (iii) **Consumer Care Society:** Nominal fees is ok. Any thing free has no value and no conditions can be attached.
- (iv) **Consumers' Forum:** Yes, there should be license fee. It should be 10% above the revenue share
- (v) **Dr. Niranjannath (CPAS):** Let it be determined by DoT & TRAI.
- (vi) **Islampur Ramkrishnapally Rural Welfare Society:**
 - (a) Yes, there should be a Annual license fee. 7% could be the license fee above the revenue from the access service provider.
 - (b) Yes, TRAI should specify a minimum license fee.
- (vii) **Orissa Consumers' Association:** Minimum amount for license fee and bidding process to be adopted.
- (viii) **Ramesh Chandra-NCHSEBPL:**
 - (a) Yes, there should be licence fees. The criteria for determining the licence fee should be as percentage of Adjusted Gross Revenue instead of certain

- percent of the proportions of revenue share received from the access service providers.
- (b) There must be minimum amount of licence fees.
- (ix) **Upbhokta Sanrakchhan & Kalyan Samiti:** Licence Fees should be determined as per No. of Directory printed it may be 25% of the cost of directory.
- (x) **AUSPI:** In case NIDQS operators are to be authorized then there should not be any license fee. In case NIDQS is licensed then license fee of 1% of AGR can be imposed.
- (xi) **COAI:** Yes, there should only be a nominal annual license fee of say 1% of AGR. Lower annual License fee would encourage investment and would thus enable the NIDQSP to provide affordable service.
- (xii) **Bharti:** We believe that any decision on the entry, eligibility criterion as well as other technical parameters should be in line with the international practices and market demand.
- (xiii) **BPL:**
- (a) Yes, there should be license fee in the form of revenue share @6% of adjusted gross revenue (AGR).
- (xiv) **BSNL:**Yes, License fee should be there on revenue sharing basis.
A nominal license fee of 1-2% may be specified for this purpose.
- (xv) **MTNL:** Yes, in order to maintain level playing field, there should be license fee with minimum specified amount. As the annual outgo with some minimum specified license fee will be involved, only serious players will come. The license fee could be defined as the percentage of Adjusted Gross revenue (AGR) as in the case of other telecom licenses.
- (xvi) **Reliance:**
- NIDQS can be classified under 'OSP' and therefore only an authorisation is needed. In such cases imposition of license fee shall not be legally tenable.
 - In case NIDQS is licensed a nominal license fee at rate of 1% of AGR a be imposed
- (xvii) **TATA:**
- In case NIDQS operators are to be authorized then there shall not be any license fee.
 - In case NIDQS is licensed then license fee of 1% of AGR can be imposed.
- (xviii) **Hari Infonet Ltd.:**
- (a) The license fees should be low as suggested above to incorporate more no of companies in and to bring in competition further government should charge license fees by charging royalty from revenue generated from all calls

and premium service handle by NIDQS. More over this kind of job is to be given to a small up coming companies big players in this area can not provider good service at low cost as their over heads are higher. Plus in depth experience in the field is must to give return to business houses who advertise on integrated talking yellow pages, This is a key part to make this line of actively acceptable by all business community. More can be discuss with demo if required and we can prove this too. If the advertiser do not get proper return they will not come forward next year to subscribe the services and revenue level can go down
(b) As Suggested above it should not be More than 1 Lakhs per circle. + Royalty on calls revenue as suggested above for first Two year of license only.

(xix) **Infonxx:**

Due to the expected level of risk and capital investment in entering this marketplace INFONXX recommends no license fee. The entry fee should be sufficient.

INFONXX notes that TRAI recommends that for publishing books, “Since the directory service is a public utility service the license fee may be a nominal amount. The annual license fee could be one per cent of the actual entry fee specified/determined at the stage of award of the license.”

If the Authority chooses to apply any license fee, then this should be the maximum level, not the 4-6% mentioned in 4.1.1.

In the UK (a mature marketplace for DQ without the investment risks of the India marketplace), the Authorities keep a lower level threshold. The ICSTIS (Premium Services Regulator in the UK) currently collects 0.34% of net revenues to fund its operations.

In France, there is an annual license fee of 40,000 Euros per active directory number (118 xxx) and a separate annual tax fee, paid to the telecommunications authority, of 20,000 Euros per company and Switzerland has a license fee of 1500 Swiss Francs per year per active dial code

(xx) **Infovision Group:** Yes, a minimum amount should be specified as we have detailed in para 6.16 above.

(xxi) **OYPPA:**

6.21 a. The views on license fee has been expressed above. To summarise, the license fee should be structured to encourage growth of the industry, permit efficient service delivery and provide for innovation to happen. Fly by night operators and those who have bad track record of servicing industry under the ambit of DoT, should be debarred.

6.21 b. No. There should be no minimum license fee specified while introducing this concept. After giving some time for the concept to take off and

after evaluating the response of the public and service delivery cost, this can be reviewed after 5-7 years.

6.22 What should be the duration of license? Please give reasons.

- (i) **Citizen Consumer & Civic Action Group:** The duration may be for ten years in order to ensure commercial viability.
- (ii) **Consumer's Association (PA Surendran):** 3 years, After it can be reviewed.
- (iii) **Consumer Care Society:** Three years is reasonable with provision for extensions or cancellations for condition violations after giving opportunity for hearing and reasons in writing for cancellation.
- (iv) **Consumers' Forum:** Duration of license should be two years.
- (v) **Dr. Niranjannath (CPAS):** Minimum 3 years. Reasons mentioned above.
- (vi) **Islampur Ramkrishnapally Rural Welfare Society:** Initially the license period may be given for 10 years and after that with renewable option.
- (vii) **Orissa Consumers' Association:** 5 years and linked to performance.
- (viii) **Ramesh Chandra-NCHSEBPL:** The period of duration of license should be maximum of 10 years with renewable option. This has been taken into consideration, since frequent changes have taken place in recent past in the technology.
- (ix) **Upphokta Sanrakchhan & Kalyan Samiti:** It is long term investment so duration of licence should be at least 10 years and renewed timely.
- (x) **AUSPI:** For business to be viable, duration of license should be at least 10 years
- (xi) **COAI:** The license could be given for 10 years duration and could be renewed for another 10 years after the end of the term.
- (xii) **Bharti:** No comments.
- (xiii) **BPL:** The license should be for a minimum period of 10 years extendable on request for a further period of 5 years at a time.
- (xiv) **BSNL:** Duration of license can be same as that for other licenses i.e. 20 years.
- (xv) **MTNL:** As circle-level integrated directory enquiry service providers have to install/ upgrade their infrastructure, reasonable duration of license i.e 10-15 years as specified in para 4.12 may be considered.
- (xvi) **Reliance:** The period of license should be atleast 10 years so that NIDQS business is viable.
- (xvii) **TATA:** For business to be viable, duration of license should be at least 10 year.
- (xviii) **Hari Infonet Ltd.:** I suggest license period for NIDQS for the period of 20 years it should not be for the period of 3 to 5 years as it takes own time

to get spread in terms of awareness in general public and even the operators need time to train its own staff to answer multiple queries for different products and services. It will also be difficult for any company to start from scratch after 3 years and even service obligation remain pending for the parties who advertise in third year for yellow pages if the license period is just 3 years. For more details please contact under sign for further details.

- (xix) **Infonxx:** The license period should be granted in perpetuity. This is widely consistent with practice in deregulated countries, and it attracts licensees that are committed to a high level of quality of service and creating a sustainable organization. This also gives assurance that the significant investments will not be wasted.
- (xx) **Infovision Group:** The duration of the license should be 10 years, at the minimum and this business requires considerable capital expenditure in the beginning, and the costs would need to be amortized.
- (xxi) **OYPPA:** The duration for license fee should be minimum seven years, ideally ten years.

Reason: For efficient delivery of this type of service, huge investments have to be made in call centre infrastructure, computing capability and network management. These equipments are depreciable over 5 to 7 years and it would take a minimum of two years to establish this service and obtain competencies. A short duration license would not attract series of players as it is just not economically viable.

Ideally it should be integrated with the period of Telecom license i.e. 10-15 years.

6.23 Should there be any performance obligations for National Integrated Directory Enquiry Service Provider(s)? If yes, justify with reasons and suggest appropriate criteria.

- (i) **Citizen Consumer& Civic Action Group:** Performance obligations will have to be specified in the license, by TRAI, so that all the areas are covered for provisioning of NIDQ service within a specified period.
- (ii) **Consumer's Association(PA Surendran):** Subscriber satisfaction should be given first priority
- (iii) **Consumer Care Society:** Yes.
- (iv) **Consumers' Forum:** Yes, there should be performance obligation which is in consonance with TRAI regulations and directions.
- (v) **Dr. Niranjannath (CPAS):** Yes. It should be under special QoS benchmarks.
- (vi) **Islampur Ramkrishnapally Rural Welfare Society:** The performance obligation may be as described in per para-4.14.
- (vii) **Ramesh Chandra-NCHSEBPL:** There must be performance obligations on the part of NIDESP (s) and it should be specified so that both basic and

cellular mobile telephone service areas are covered at a particular period of time.

(viii) **Upbhokta Sanrakchhan & Kalyan Samiti:** There is not necessary for any obligation for NIDQS because there arises monopoly on obligation.

(ix) **AUSPI:** A coordination committee may be setup with representatives from NIDQS operators and TRAI. The deadlines to provide printed directory, NIDQS and interconnection could be decided by the committee. The deadlines set by the committee should be applicable on NIDQS operators.

The authorization/ license may prescribe a broad performance obligation of covering half of service areas in first year and remaining circles in second year. The committee may decide finer details within performance obligation specified in license/ authorization.

(x) **COAI:** The roll out could be completed in a phased manner with specified number of service areas to be covered with establishment of POPs and directory enquiry system on an yearly basis during the specified roll out period. For example, as stated by the Authority in its consultation paper, the service could be implemented in, say 12 service areas in first year and in the remaining 11 service areas in the second year.

(xi) **Bharti:** No comments.

(xii) **BPL:** Yes, there should be performance criteria laid down for the NIDQS provider. Some of the following criteria could be laid down.

- Roll out to be completed within specified period
- The time to answer a call should be less than 10 seconds for 90% of the calls; this is as per ITU norms.
- Adequate number of junctions should be provided so that the call failure rate is less than 2%. The enquiry service should be provided in national/state language as well as in English.

(xiii) **BSNL:** Yes, there should be performance obligations especially with regard to the roll-out period, number of languages in which the service is available, number of LSAs for which the service is available and the number of Access Service Providers, it has been accredited to.

(xiv) **MTNL:** Since minimum amount of license fee is proposed to be specified, this itself will force the licensee to provide the service at the earliest.

(xv) **Reliance:**

- The TRAI may create a coordination committee with representatives from service providers, NIDQS providers, TRAI and DoT officials.
- The implementation should be done in phased manner within deadlines decided by the coordination committee.
- Since implementation of project depends on cooperation of all parties, it is suggested that only an indicative project implementation schedule as

stated by the Authority in its consultation paper, the service could be specified, say 12 service areas in first year and in the remaining 11 service areas in the second year.

- (xvi) **TATA:**
- A coordination committee may be setup with representatives from NIDQS operators and TRAI. The deadlines to provide directory and interconnection could be decided by the committee. The deadlines set by the committee should be applicable on NIDQS operators.
 - The authorization/ license may prescribe a broad performance obligation of covering half of service areas in first year and remaining circles in second year. The committee may decide finer details within performance obligation specified in license/ authorization.
- (xvii) **Hari Infonet Ltd.:** Yes their should be a performance obligation in terms of providing services to public at mass on failure their should be a penalty too and on subsequent failure license of such service provider should be pass to other companies and the license amount should be forfeited.
- (xviii) **Infonxx:** Service requirements should be limited to the NIDQS providing information to callers that is readily available from the carriers. Network operators should provide daily listing data updates. NIDQS will post these updates on a daily basis.
- (xix) **Infovision Group:**The following service level obligations should be specified:
- 80% of calls must be answered 3 rings/10secs.
 - 97% of calls should be answered; 3% or less abandoned calls.
 - 85% accuracy of data supplied.
- (xx) **OYPPA:** There should be definitely a performance obligation. Considering the nascent stage, the performance standard should be graded and gradually increased every six months. The criteria could be maintenance of database, tackling of redundancy, quality of service delivery in terms of user frequency, comprehensiveness of the database in terms of entries offered to the consumer for Yellow Page enquiry and clarity in print and communication network. This could be further elaborated and modified based on experience and consumer feedback, from time to time.

6.24 Should there be a performance bank guarantee for the National Integrated Directory Enquiry Service Provider(s)? If yes, suggest the amount and modalities.

- (i) **Citizen Consumer& Civic Action Group:** To increase the accountability of the licensee, a performance bank guarantee will definitely help.
- (ii) **Consumer's Association(PA Surendran):** Performance Bank Guarantee to be obtained from the service provider
- (iii) **Consumer Care Society:** Yes.

- (iv) **Consumers' Forum:** Performance bank guarantee must be based upon subscribers base, so as to guarantee the quality of service.
- (v) **Dr. Niranjannath (CPAS):** Let it be determined by DoT & TRAI.
- (vi) **Islampur Ramkrishnapally Rural Welfare Society:** Yes, there should be a performance bank guarantee to ensure compliance of the terms and conditions of license. The amount of Bank guarantee may be as prescribed by the TRAI.
- (vii) **Orissa Consumers' Association:** Yes with penal clause.
- (viii) **Ramesh Chandra-NCHSEBPL:** NIDESP(s) should be asked to provide performance bank guarantee and this could be 25% of the licence fees. The bank guarantee can be given at the time of contract.
- (ix) **Upbhokta Sanrakchhan & Kalyan Samiti:** It is not necessary for any bank guaranty because unnecessary of investment.
- (x) **AUSPI:** A nominal bank guarantee of around Rs 1 crore may be prescribed for an NIDQS operator. This guarantee will not add significant cost for the operator but at the same time it will keep non-serious players at bay.
- (xi) **COAI:** As stated earlier, we again wish to submit that performance bank guarantee (PBG) is NOT required.
- (xii) **Bharti:** We would also like to state that as a principle, we discourage the concept of Performance Bank Guarantee (PBG) and there should not be any provision of PBG for these operators as it unnecessarily leads into huge cost for an operator. The PBG/FBG should even be abolished for the other telecom Licences as well.
- (xiii) **BPL:** Yes, a PBG of suitable amount should be prescribed based on the decision to provide the service on service area/or regional/or national basis.
- (xiv) **BSNL:** Yes. There should be Performance Bank Guarantee to ensure performance obligations. Value of PBGs should be 5% of entry fees and the PBG should be in favour of DoT to ensure performance obligations.
- (xv) **MTNL:** To ensure the compliance of the terms and conditions of the license, performance bank guarantee for the circle level integrated directory enquiry service provider may be kept as Rupees ten lakh as in the case of Other service providers.
- (xvi) **Reliance:** There may be PBG for nominal amount of around Rs 25 lakhs for metro and A category circles, Rs 15 lakhs for circle B and Rs 10 lakhs for circle C.
- (xvii) **TATA:** A nominal bank guarantee of around Rs 1 crore may be prescribed for an NIDQS operator. This guarantee will not add significant cost for the operator but at the same time it will keep non-serious players at bay.
- (xviii) **Hari Infonet Ltd.:** Yes their should be a performance bank guarantee in terms of providing services to public at mass on failure their should be a penalty too and on subsequent failure guarantee amount can be used to full

fill obligation of service generated by such companies In any case bank guarantee required for such kind of obligation will be not more than 6 lakhs rupees. More details I can only forward during personal discussion with justification.

- (xix) **Infonxx:** Given the expected level of investment for this initiative, funds that could be used for people, equipment or facilities should not be diverted from the project to a performance bond. Additionally, as other countries moved toward a national DQ service or deregulated, performance bonds were not required as a condition of participating in the project. **INFONXX is not able to participate in a requirement that has a performance bank guarantee requirement in the manner that has been outlined by the Authority.**
- (xx) **Infovision Group:** As this would be a commercial project in a competing environment, the customer will have the freedom to switch service providers in the event the service is bad or inaccurate information is being given. This in itself will act as an inbuilt guarantee. There should be periodic evaluations by TRAI against defined service levels.
- (xxi) **OYPPA:** There must be a performance Bank Guarantee given by the selected licensee. This should be for Rs. 3 crores for a metro circle, Rs. 2 crores for other A grade circles like Karnataka, Andhra Pradesh, Tamil Nadu, Maharashtra, Gujarat and Punjab. For B grade circles it should be Rs.1 crore and for C grade circles Rs. 50 Lacs.

6.25 What are the various Quality of Service parameters to be taken into account for quality directory information service to be provided to customers through National Integrated Directory Enquiry Service Provider(s) and their benchmarks? Please substantiate your view with reasons.

- (i) **Citizen Consumer& Civic Action Group:** With regard to the quality of service provided to the customer, it is important to give accurate information in addition to easy accessibility of the service by the NIDQ service provider. It is essential for the concerned access provider to frequently update the customer information in respect of addition, deletion, change of name, numbers etc. and provide such information to NIDQ service provider at periodic intervals. In respect of bulk changes in telephone numbers due to technical reasons, the same should be notified to the concerned consumers well in advance. Such bulk changes should also be reflected in NIDQ service on immediate basis.
- (ii) **Consumer's Association(PA Surendran):** . Delay should be avoided
- (iii) **Consumer Care Society:** Yes.
- (iv) **Consumers' Forum:** QoS parameters as in TRAI regulations must be the basis for NIDOS also.
- (v) **Dr. Niranjannath (CPAS):** Best Bench Mark is Consumer Satisfaction.
- (vi) **Islampur Ramkrishnapally Rural Welfare Society:** Following parameters to be taken into account for quality of services –

- NIDQSP will ensure the continuity of service
 - NIDQSP will provide sufficient ports at POP.
 - Access service provider will have to provide sufficient number of circuits. TRAI will determine the QOS and NIDQSP & access service provider will ensure the standard.
- (vii) **Upbhokta Sanrakchhan & Kalyan Samiti:** The quality of service parameter should be best service on lowest/cheapest price.
- (viii) **AUSPI:** For quality directory information service to be provided to customers, AUSPI is of the view that response time to customers for assistance is the major parameter to be taken into account.

In this connection, we feel that the benchmarks of response time stipulated in the Regulation on Quality of Service of basic and cellular mobile telephone service, 2005 (11 of 2005) are adequate.

- (ix) **COAI:** In the consumer's interest, it is suggested that TRAI should formulate QoS standard i.e. Parameters and benchmarks for NIDQS. Some parameters which could be defined could be; Call completion rate, Agent response time etc.
- (x) **Bharti:** In the consumer's interest, it is suggested that TRAI should formulate QoS standard i.e. Parameters and benchmarks for NIDQS. Some parameters which could be defined could be; Accessibility, Quality of Service Delivery, Accuracy of Information, Call completion rate, Agent response time, customer satisfaction done through external body etc.
- (xi) **BPL:** Same as 6.24.
- (xii) **BSNL:** Courtesy, politeness, accuracy and promptness are the most important parameters for determination of performance of such service. However, we may have to evolve methods and mechanisms to benchmark and measure the same.
- (xiii) **MTNL:** The circle level integrated directory enquiry service is mainly operator based service; therefore QOS parameters should be similar to the QOS parameters as specified for operator based wireline /wireless services. Additionally, the quality and correctness of the information supplied to the caller may also be included.
- (xiv) **Reliance:** The Authority may specify QoS norms for NIDQS similar to norms on parameters like 'response time to the customer for assistance' specified for access providers under TRAI's Regulation on Quality of Service of Basic and Cellular Telephone Services, 2005.
- (xv) **TATA:** For quality directory information service to be provided to customers, TTL is of the view that response time to customers for assistance is the major parameter to be taken into account. In this connection, we feel that the benchmarks of response time stipulated in the Regulation on

Quality of Service of basic and cellular mobile telephone service, 2005 (11 of 2005) are adequate.

- (xvi) **Infonxx:** The criteria we propose are:
- Make data available from all Network Operators in all areas of India, updated daily (subject to those operators supplying data at the same regularity and in the prescribed electronic format) and managed in a non-discriminatory manner.
 - Services must be operated in line with relevant standards of privacy protection that Indian customers would expect.
 - If Call Completion (connecting a call onward to a number) is part of the NIDQS then this service should have sensible limitations with regard to certain sensitive service areas such as those laid out by ICSTIS in the UK ^{Note 4}.

- (xvii) **Infovision Group:** The following parameters should be used:
- Average wait time
 - The less the consumer has to wait, the better the experience
 - Average handling time
 - The less the consumer has to wait, the better the experience
 - Cost
 - Accuracy of information supplied.

- (xviii) **OYPPA:** The three service quality parameters for NIDQS are:

a. Maintaining valid database of both the telephone subscribers and exhaustive database of products and services falling under the ambit of Yellow Page enquiry.

b. Accessibility to the consumer/user of service. Multiple options given to the consumer to access the data which could be through Voice, Online, SMS and without any restrictions on the service operator's systems through which the data can be accessed.

- c. Response time and courteous service.*

While it is difficult to specify the benchmark applicable for individual segment of the service, the endeavour of the licensee in NIDQS should be to maintain the database validated with validity level of at least 95% all the time and answer the query of the customer as soon as possible.

As regards the service delivery, there should be effective co-ordination between all the parties involved, i.e. TELCOs, NIDQS licencees and consumer organizations from time to time. Since the database provided by TELCOs is the backbone of the service, the TELCOs should be mandated to transmitted the data at agreed intervals preferably in real time. Further they should also be mandated to answer all queries to the satisfaction of NIDQS service provider for proper service provision.

6.26 What should be the other terms and conditions for National Integrated Directory Enquiry Service Provider(s)? Please list and comment with reasons.

- (i) **Citizen Consumer& Civic Action Group:** Other terms and conditions should include a clearly formulated, effective Consumer Redressal Mechanism. This would ensure that the system will be able to continuously improve its services and become more customer- friendly.
- (ii) **Consumer's Association(PA Surendran):** Collect feed back from the subscribers / the consumers. The performance should be monitor and reviewed every 6 months
- (iii) **Consumer Care Society:** Yes, let TRAI pick up best international practices
- (iv) **Consumers' Forum:** Provisions in consultation paper would be enough.
- (v) **Dr. Niranjannath (CPAS):** Let it be determined by DoT & TRAI..TRAI has team of experts & has done good job till date. CPA,HIMMATNAGAR,GUJARAT.
- (vi) **Islampur Ramkrishnapally Rural Welfare Society:** It may be as per TRAI regulations/ directions.
- (vii) **Orissa Consumers' Association:** Kind/type of services be specified/time frame for compliance failing which amount of compensation be awarded automatic to subscribers in the bill & methodology be worked out to make SPs accountable.
- (viii) **Uphokta Sanrakchhan & Kalyan Samiti:** Both parties bound under a contract and guidelines, in case of contravention of guidelines of breach of contract cash security money should be forfeited by Govt.
- (ix) **AUSPI:** No other comments.
- (x) **COAI:** No comments.
- (xi) **Bharti:** The Hon'ble Authority may like to decide the parameters in such a fashion, which can easily filter the serious player via-a-via frivolous players.
- (xii) **BPL:** Other terms and conditions of the license should be similar to the terms and conditions prescribed for other telecom licenses.
- (xiii) **BSNL:** The response should be provided in regional language in addition to Hindi and English languages. However, web /SMS based Directory Information may be in English language only.
- (xiv) **Reliance:** No other comments.
- (xv) **OYPPA:** While laying down the guidelines for the licence terms and conditions, the concerned authority should bear in mind the happenings in the Telephone Directory industry in the year 1988 to 1996, wherein non-serious and ill-equipped players entered the field and ultimately were responsible for the retarded growth and non realization of the full potential of the industry. This also resulted in delay of information provision to the

public. Thus, it did not help the trade & industry nor the common consumer as it has done in the advanced countries like US and Europe.

Therefore, the agency selected must possess proven competence in the domain of Database Processing, Validation, Service Delivery and should have a proven track record of meeting consumers' expectation. The organization selected should not be one which has been debarred/black-listed by any of the PSU / Govt. departments.

As regards the pricing for the services to be provided, while the authority can start with some bench-marking price, it should be left for the market forces to determine the same over a period of 2 years.

In sum and substance, the guidelines of the policy should be to achieve the twin objective of assisting to the growth of the Telecom services as well as meeting the expectations of the service providers and consumers both in the matter of integrated directory enquiry and NIDQS, both for telephone number enquiry and product and services enquiry.

Additional Notes

(1) BSNL

1. BSNL had earlier, in response to previous recommendations of TRAI on directory printing, written to DoT clearly advocating the stand of dispensing with the directory printing exercise. BSNL is still of the view that in the present scenario of multi-services, multi- operator regime, the share of fixed line numbers, which has already been reduced drastically and will continue to go down further. BSNL reiterates its views and opposes the proposal of printing of Integrated Telephone Directory containing fixed telephone numbers of all the operators due to following reasons :-
 - i) As per information available in Para 2.3.2 of the consultation paper, BSNL's & MTNL's shares are 81.03% and 9.19% respectively of the fixed line segment in the country. With the share of private operators being only 10%, share of such fixed line subscribers is less than 20% of the total connections in the country. Hence, no useful purpose will be served by printing directory of only fixed lines which is such a small % of total connections.
 - ii) From the experience, it has been observed that most of our SSAs are unable to print their own SSA wise directory in time and the same is either delayed beyond limits or not published at all, thus defeating the very purpose. The reasons are, some times, beyond control such as non availability of printer, disputes on tenders and arbitration/ litigation etc. By the time these obstacles are removed, the data become obsolete due to frequent changes. As a result, printing of an integrated directory, periodically, will again be a futile exercise.

- iii) Directories, containing telephone numbers of only BSNL subscribers, are already quite voluminous and difficult to handle. If the telephone numbers of all the other operators are also included, the size of the directory will be totally unmanageable and may become useless, due to frequent handling.
 - iv) Providing the updated data by the operator in the electronic format to the licensee for printing of directory may drag the licensee in to unnecessary litigations by subscribers if their entries are not correct. Checking the authenticity of the data will become another grey area and may lead to litigations.
 - v) O. M. No. 14034/4/92-O. L. (A-I) dated 26-8-92 of Ministry of Home Affairs, Department of Official Language regarding publication of telephone directory in Hindi and English, makes it obligatory on the part of DoT to publish Hindi and English version of Telephone Directory simultaneously. Further, it has also been mentioned in the said OM that Hindi version of Telephone Directory should be published before the publication of English versions in regions `A' & `B'. Initially, both the versions are to be published in equal numbers or in the ratio 40:60 in Hindi and English in regions `A' & `B' and the ratio of 30:70 in regions 'C'. The Parliament Committee on official language has already raised objections against BSNL for not following these guidelines.
 - vi) It will be difficult to assess the exact number of customers who want printed directory. Even if a survey is conducted prior to printing of directory, it is very likely that the subscriber may not come forward to collect the directory on payment later on which will again be a matter of dispute and ultimately result in dumping of huge number of undistributed copies.
 - vii) The fixed line services are already expensive as compared to mobile services. Mandating printing of telephone directory for fixed telephones only is discriminatory in nature and will further increase the cost of the fixed line services and will make them uncompetitive.
2. In addition to the above issues, the following constraints are also required to be taken into consideration:-
- (a) In the event DoT decides to go ahead with the present proposal to print unified directory consisting of all the telephone numbers of all operators and entrusting the job to the incumbent operator, BSNL should be given the option to discontinue printing the telephone directory at a later date depending upon techno-economic viability.
 - (b) Apart from cost of printing of telephone directory, there are other incidental expenditures involved such as expenditure in keeping the printed directory in stock till distribution, defending the cases in courts in disputes related to directory printing either with the contractor or with the subscribers (who claim deficiency in service).
 - (c) Though time period is prescribed for supplying the data by the other operators to the organizations printing the directory, there may still be some delays on part of one or other operators in supplying the data and there is need to block the loop-

holes so that the directory printing is not delayed and burden of collecting the data is not unfairly placed on the organization printing the directory. Rather the burden for timely supply of data should be on the operator whose numbers are to be printed. It also needs to be decided whether the directory in such cases can be printed without the numbers of defaulter telecom operator.

- (d) In the event of more than one licensees being permitted to print the directory, as is envisaged in the consultation paper of TRAI, how the quantity of the directory to be published will be decided. Presumably, all the organizations printing the directory will include the entire operator's data and thus there will be overlapping if the total quantity is not allocated in advance. It needs to be decided whether the exercise of printing directory shall be initiated independently and on the same by the organization entrusted with the task of publishing.
- (e) There may be delays in printing of telephone directory by one licensee due to court cases/arbitration cases. In such cases the printing of directory will be with the old data in many of the cases which will not serve any purpose. The procedure to be followed in such cases and sharing of cost needs to be clearly spelt out by TRAI. Further, the schedule of printing of next issue, in such cases of delays, also needs to be evolved.
- (f) At present, there is provision in directory policy of BSNL for appointment of arbitrator if disputes or differences arise between the BSNL and the printer. Whether the same procedure shall be applicable for resolution of disputes related to printing of unified telephone directory and the competent authority to appoint arbitrator needs to be specified.

(2) Infonxx:

Access Code Arrangements:

INFONXX believes that to enable the Directory services to have the best chance of success, the Access Code numbering should be made as simple as possible to remember. This will reduce the marketing costs required to get customers to know and remember how to access the services, and so increases the potential reasons to invest in offering this service.

INFONXX proposes that a 3-digit code should be enabled, similar to 197 in format. If 2 licenses are awarded that is a maximum of 4 codes that need to be enabled, so this is easily available using a suitable numbering system.

We further recommend that DoT allow the licensees to whom NIDQS licenses are granted to choose numbering codes among those that are available under the India numbering plan. Should more than one licensee select the same code or codes, the codes should be awarded on the basis of a lottery system.

Note 1:

(India) This paper primarily addresses policy changes by the Indian government in regards to Foreign Direct Investment; however there is a significant discussion on how the incumbent carriers used their market position to restrict competition.

White Paper ISAS Working Paper #10 May 2006 *Rahul Mukherji*

(UK) During changes in the UK Directory Enquiries marketplace, designed to increase competition through introducing a range of new Access Codes, BT their new DQ number 118 500 in advertising in a manner that implied that there were no other new Access Codes.

(Italy) Telecom Italia and other operators violated the rules set for by the regulatory agency in Italia relating to fair play and deregulation. The AGCOM initiated actions against them but the time it took to force compliance undermined a new competitor's ability to compete in the market place. There are law suits pending for hundreds of million Euros for damages.

Note 2:

Current disposable income per head in India, in \$PPP terms, is \$2,303, but is expected to grow to \$3,033 by 2008

(Purchasing power parity is an economic concept that measures the differences in purchasing power between multiple countries. For instance, in India, GDP per head is \$620 today, but in India you could buy the equivalent of \$3,330 in goods that you would be able to purchase in the US. This means the PPP factor of goods in India vs. the US is 5.3 times [$\$3,330/\620].)

Note 3:

- 100% foreign ownership of Directory Enquiries companies is currently allowed in European countries served by INFONXX. These countries include the UK, Ireland, France, Italy, Austria and Switzerland.
- **Reference document “Telecommunications Turkey”**
 - EsinIsmen Law Firm - Tolga Ismen, Yasemin Zongur

Note 4:

ICSTIS (UK):

Typical examples of specific conditions which the Committee may impose on such services include:

- **That a DQ service provider providing a full national DQ service must subscribe to the BT OSIS database or an equivalent database which provides updates to licensees at least as frequently as BT's OSIS database.**
- That a DQ service provider providing an international DQ service will be able to confirm that they have (or have access to) a directory equivalent to the national directory available in the country or countries they wish to cover.
- That call completion will not be permitted to those types of premium rate service that currently need to pay into the ICSTIS Compensation Scheme and lodge a bond, such as live one-to-one chat, tarot or multi-party chatline services.
- That call completion will not be permitted to sexual entertainment services (live or recorded).

Annex 1

1 **Database Information Required for Directory Information purposes:**

Mandatory information to be provided by the mobile operator to the Directory Assistance Data Base:

Holder Name – name of the person who is primarily going to be carrying the phone

Holder Home Address – house number, street, city, state, post code

Holder's age – is the holder a minor?

Cell Phone number

Billing Name – of the person or entity paying the bills on the phone (only if different)

Billing Address – number, road/street/route, city, state, post code (only if different)

Billing Name Category if entity – category of the business that owns the phone (only if business)

Billing phone number – landline and/or other cell phone number (please note which it is) (only if different)

Relationship of Billing Name to Holder Name – employee, owner of business, relative (son/daughter, mother father, brother, sister etc)

Holder's Employer – if employee, then this may be a good way of uniquely identifying that person in the event there are many with same names

Holder's Location of employment – office address

Holder's highest level of schooling achieved and school and degree – (may help in identifying people with common names?)

(Some other “identifying” information to help the operator find the proper party?)

Holder's Email address (if one exists)

Holder's updated information– mobile carrier required to verify and update information where there is consumer “account activity” or at least every three years

Required, but not from cell phone owner:

Date of update – in other words, the date when the information is added to the database by the service provider or carrier so that you would know the date the data was provided

(3) Surya Foundation:

In considering various issues brought out in the Consultation Paper No 10/2007, the decreasing population of subscribers which would be available for listing in the directory to the total number of subscribers, will need to be reckoned with. By end December 2007, these figures would appear to be 40 million / 240 million. There are no reasons to believe that this ratio will improve in the coming years. Another trend is that more and more mobile subscribers keep the particulars of numbers that they need to call on the mobile phone, thus progressively reducing the need for a telephone directory, printed or electronic.

Printed telephone directories cannot be updated at short intervals on account of cost and effort. CD ROM can be a good alternative except that these also cannot be updated and made available to subscriber at sort intervals.

The basic requirement would appear to be the updating of information ‘online’ and feeding it on a website which can be accessed by subscribers. The multiplicity of service providers will aggravate the problems however. Special softwares will be needed to arrange all the information received, in the directory format, especially to bring it in alphabetical order. Programme will also be required to bring it in the ‘address’ format.

For printing of local directories at SSA level, competitive offers will have to be invited by the respective General Managers. The main parameters should be the facility to the subscriber. He should get one directory per DEL (Direct Exchange Line) free of cost: as also the assurance of availability of directory at regular intervals. The number of printers should be the minimum; preferably only one so as to limit the problem of coordination. Best possible contracts should be arrived at in individual cases.

We may also encourage publishers to provide group-wise information.

(4) Kesavamoorthy K.:

The following is my proposal for the Directory-Enquiry Service at service-area level and national level

Fixed-Line and Mobile: In the era of convergence its futile to segregate the customers on the lines of fixed and mobile. In future there may be scenario in which the same number will be used in the landline and mobile. In this wireless world most of the home doesn't have any landlines.

Providing printed directory of only landline numbers is not in favor of technology-neutral approach for which TRAI is known for. I desist myself from discussing further in terms of mobile and fixed line throughout this proposal rather I would just take it further by a simple united term telephones.

Directory Enquiry Service (DES) ::

DES is very important in the context that it gives valuable information about a person just by knowing his telephone number. Since DES can also cause privacy issue, it's necessary that every customer should be given option of not including them in the directory.

Just before getting into how to implement the directory service, we'll analyze the spectrum of customers and theirs means to reach different facets of directory service.

The following table is collection of such information.

Means	Target Customers	Revenue Stream for DESP	Type of Search
Printed Directory	Able to read in regional language	through ADs in yellow pages	All Combination
SMS	Able to read in English language and owns SMS capable telephone	No revenue for DESP (Operator can automate the search in DESP's web page and return result to customer)	through particular number
WEB(including access thro' Mobile Internet)	Able to read English language and Able to operate computers/Owners of Net enabled Handsets	through ADs in website	All Combination
Call	Any telephone owner	per minute call rate	All Combination

DESP → Directory Enquiry Service Provider

Directory Enquiry Service Provider(DESP)::

I would recommend separate class of license for these providers at service area level. Telecom is phenomenally growing industry. Its necessary to ensure this sector becomes a rainbow sector instead of becoming red and blue. I recommend none of the service providers to become DESPs. Following are the criteria I propose

- 1) An entity which holds more than 20% equity in the DESP should not hold more than 20% equity in any of the service providers or in other DESPs of the service area
- 2) Number of DESP per service area should be limited to 3
- 3) DESPs should be selected through auction process
- 4) Base price should be fixed by DoT after market study of respective service area
- 6) 74% should be FDI limit since it belongs to telecom sector
- 7) BSNL can be entrusted with duty of DESP if there's shortage of private DESP in any of the service area
- 8) PBG should be mandated
- 9) There should be specific net-worth criteria depending on the service area
- 10) License fee should be percentage of revenue share
- 11) Technical capability of the bidder should be analyzed before allowing him for auction
- 12) Each DESP should be allotted unique 5-digit number
- 13) Tenure of license should be 10 years
- 14) DESP should be entrusted with duty of printing directory district-wise, providing call-centre for enquiry and maintaining web-based search engine

Service :

Choice for customers ::

I would recommend opt-out approach for existing customers. The new customers should be given option during the enrolment time. As suggested the sufficient advertisement should be brought by the operator to ensure that every existing customer is aware that he can opt-out of directory. The attached is the fields which should be captured for every customer by every operator.

NAME	First Name
	Surname

PROFESSION	Profession
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ADDRESS	Door No
	Street Name
	Village/Town/City
	District
	State

AREA CODE	Pincode
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All the fields should be present in the future enrolment sheet of all the operators. Verification of above information except for profession is mandatory for every operator for its customers. The customer should have option of opting-out completely or partially by selecting main category viz profession, address or area code. For partial opting-out, Name category is mandatory. For printing directory all main categories are mandatory except for profession.

Printed Directory::

I recommend printing the directory administrative district-wise rather than telecom district wise as recommended in the consultation paper. Its difficult to segregate the mobile numbers by SSA's wise but it would be easy to segregate District -wise since all the customers would have mentioned the district to which they belong in their address. Since the 80% of mobile customers are in prepaid it would be meaningful to include them in the printed directory as well. The customers can have the choice of suppressing their profession in printed directory. The DESP should have published the printed directory within a year of getting license in all districts of the service area. DESP should give sufficient time for all operators before publication. Minimum QoS should be specified by DoT before inviting for bid (paper quality, print quality, format of white pages, emergency numbers). The yellow pages

should be left to the wish of DESP but ensuring that advertisements/contents are not pornographic since it goes to every home. Directory shall be printed on a triennial basis with main directory on the first year and supplementary on 2nd and 3rd year. The supplementary should have both additions and deletions with respect to main directory. DESP should be mandated to print directory in regional language of the service area and English directory can be optional depending on market demand.

Web/SMS ::

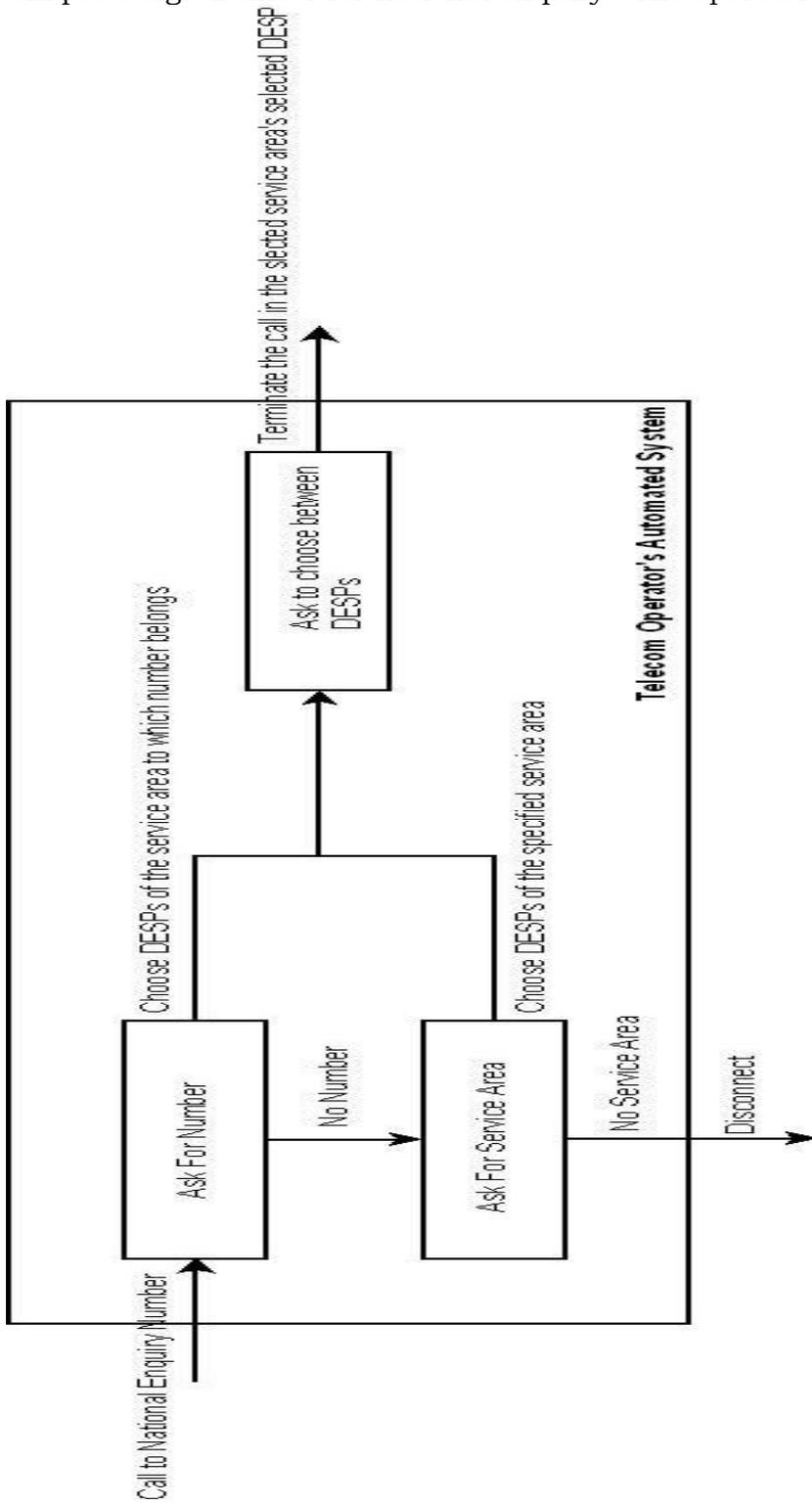
Web based directory should be reachable by both mobile internet(WAP portal) and normal internet. The searching should be provided through any of the combination of the fields mentioned above. The web directory should be implemented within 6 months from the date of license. In web listing customer should have option of suppressing any of the main category listed above (Address, Area code and Profession). DoT should tighten the cyber laws in a way that no other sites can show directory listing which may affect the revenue stream of the DESP. Search engines like Yahoo, Google shouldn't be allowed to index DESPs' sites. TRAI can blacklist any international site which hosts directory listing of Indian telephone numbers. Customer once requested for complete opt-out or partial opt-out or complete opt-in or partial opt-in should reflect within 5 working days of such request in Web based enquiry. For printed directory it should reflect in the next main/supplementary if its raised 5 months prior to publication.

For SMS enquiry by sending search number, the operator need not send that request to DESP. Operator himself can search the information through automated system on DESP's website and return the result in SMS to customer.

Voice ::

DESP should be mandated to establish call centers in English and service area's regional language. It should provide enough terminating points at its POP. QoS should be specified in the license agreement (like maximum call waiting, congestion parameter etc.). TRAI and DoT should help DESP in reaching commercial agreement between different operators ensuring that call rates are within affordable limits for customer. For regional enquiry there will be specific number for each DESP of that service area. Operators should just terminate the calls at appropriate POP of DESP. For national enquiry, I propose following model. There should be

unique 5 digit number for national enquiry. The operators should implement following;



Data Security::

DESP should be responsible for safe-guarding the data available with him. DoT should specify certain data security standards which DESP should follow. DoT should conduct periodic audit on these area and should be able to disqualify DESP if its not able to maintain data security standards laid out in license conditions

On-net Enquiry Service::

All telecom operators should maintain their own web-based directory enquiry (viewable even through mobile internet) with similar options (opt-out , parital opt-out et.,) and similar fields for all its telephone customers.