

RCL/TRAI/LT/15-16/4874  
07, Dec 2015

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

Subject: Consultation Note on IP based Interconnection

Dear Sir

1. With reference to the Consultation Note on IP based interconnection, wherein TRAI has suggested the amendment in the relevant licences for facilitating the interconnecting parties over IP based network. In this regard, we would like to suggest addition of below amendment in the **Unified license**:

1.1.1. **Clause 27.3.1:** Interconnection between the IP based networks of different licenses for carrying IP traffic shall be **based on the mutual agreement of the interconnecting parties and** within the overall framework of the interconnection regulation/directions/ orders issued by TRAI/Licensor from time to time.

1.1.2. **Clause 27.3.2:** For interconnection with Packet Switched network of different service providers within India relevant national standards are to be followed.

Thus, IP interconnect between operators to be allowed on mutually agreed basis. We also suggest that similar amendments should be done in UASL and CMTS licences.

2. Further, it is submitted that Access operators should provide IP interconnection to licensed entity only i.e. any entity like content providers who are not licensed in India should not be allowed to have direct interconnection with TSP.
3. Today, for IP based NGN network, it is mandatory to have media gateway within the licensed service area. **We request that the restriction to have MGW in each licensed circle should not be there** specially if carriage of Intra-circle calls by NLDO is allowed. A UL having both NLDO and Access authorization can use a single large switch with single media gateway as long as it complies with the

designated points of handover of various calls as per the architecture mandated and revised by TRAI/Govt from time to time.

With Regards,  
For **Reliance Communications Ltd.**

A handwritten signature in black ink, appearing to read 'Amit Mathur', written in a cursive style.

**(Authorized Signatory)**

**Amit Mathur**  
**Ex. Sr. Vice President**

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