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**Subject:** ZVC India (**Zoom's**) response to TRAI's Consultation Paper Dt 11JUL24 on the Framework for Service Authorisations to be Granted Under the Telecommunications Act.

**Ref: DoT UL Licensee for Access For All 22 Circles with NLD & ILD Dt24APR23.**

Dear Sir,

We have obtained All India UL Access License (22 Circles) in early 2023 for offering Internet Telephony Services and had to limit our rollout to few main circles as Numbering and Circle based regulations are supportive of circle wise large scale rollouts. However, we are a small operator with focus on Cloud Based Voice Solutions for Enterprise users (Mostly MNC/GCC in ITES Software Dev, BPO, Call Centre) and we would like to welcome a **Nationwide Access License** envisioned in the TRAI consultation paper.

With reference to the above consultation paper please find our response mainly seeking changes to help new operators to start/provision services. The main topics are below and detailed in the following pages.

1. A Nationwide Wide Authorisation for Access Service as per Government's theme of One Nation One License (as proposed in 2.86 Sl.No 1 as Category A Page 63/59 Reference A) with a National Numbering Scheme.
2. A fully authorised entity (UL Licensee) should be allowed to operate as VNO of the respective authorisation by intimation (as envisioned in TRAI **Differential Licensing Dt 19Aug2021**) without having to obtain an additional VNO authorisation.
3. AGR: Irrespective of number/type of Authorisations held by an entity a **consolidated filing and computation of AGR should be allowed just like IT-Income Tax allows for different types of Factories/Warehouses which are spread in many states/IT Circles.**
4. Most Regulations related to CAF's, KYC, Number Allocation, MNP Porting, Database reporting, audit activities etc. are prescribed for individual users and need to be revised keeping Business Users in mind. (Currently Business Users need to sign multiple CAF's circle wise with KYC and numbers need to be allocated circle wise in each Business Users circle).

We request the TRAI to consider above **to help new operators to expedite their rollouts and reduce multiple compliance burden.**

Thanking You,  
For and on behalf of ZVC INDIA PRIVATE LIMITED (UL Licensee)

(Authorised Signatory)  
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Extract from TRAI Consultation Paper Dt 11JUL24 on the Framework for Service Authorisations to be Granted Under the Telecommunications Act.

2.86 For ease of understanding, the proposed framework for the flagship service authorisations, as discussed in the above sections, can be seen at a glance in the following table.

S. No.	Proposed name of service authorisation	Type of Services permitted under the authorisation			Service Area Category <sup>®</sup>		
		Public Telephony Service	Public Internet Service	Private Leased circuit/ VPN	A	B	C
1	Unified service	✓	✓	✓	✓		
2	Access Service	✓	✓	✓		✓	✓
3	Internet Service		✓	✓	✓	✓	✓
4	Long Distance Service	✓*		✓	✓		
5	Satellite-based Telecommunication Service	✓	✓	✓	✓		

\* to the extent of carriage of switched bearer telecommunication traffic

® The Service Area categories could be defined in a manner similar to the categorization of Service Area in the Unified License and Unified License for VNO: Category A: National level (Pan India), Category B: Telecom Circle/ Metro area and Category C: SSA/ District

2.87 In addition to the flagship service authorisations mentioned above, service authorisations would be available for other services as mentioned in the DoT's reference

## Response to Q1-Q4:

**A UL License should be allowed to operate as VNO of the respective authorisation.** A clarification may be issued in this regard as envisaged in the TRAI recommendation: **Enabling unbundling of Different Layers through Differential Licensing Dt 19Aug2021.**

*Page 50 Recommendations 3.5: The Authority recommends that **since the combined scope of Access Network Provider and UL-VNO (Access service) is equal to the scope of a Licensee with Access Service authorization under UL, the Minimum Equity, Minimum Net worth, Entry Fee, and FBG/PBG requirements for the proposed Access Network provider authorization may be arrived at by deducting the amounts prescribed for UL (VNO–Access Service) from the amount prescribed for UL-Access Service authorization.***

**As envisaged by TRAI a UL Entry Fee already includes 2 components 1. Access Network Provider and 2. UL-VNO (Access service) and hence a UL Licensee should be allowed to operate as VNO of the respective authorisation by intimation without any additional fee or authorisation.**

**Converse VNO (Infrasharing):** New UL operators have entered India with New Technology and New Services, and the same can be leveraged by existing Incumbent operators who have Network and Reach. This is a converse of the VNO Model.

New Technology Operator's will host Incumbent Operators Numbers and provide Application Services like PBX/CCPS/HCCPs as envisioned in TRAI Recommendation Paper for OSP 21<sup>st</sup> October 2019. Incumbent Operators can bill and provide transport service to their customers and application layer can be provided by the New Technology Operator. **Please refer Annexure A in last page for scope.**

**Q5-6. Unified service authorisation at National level.** We would like to suggest the following 5 types of Authorizations:

1. **National Number Based Services** (Currently Access Service Voice & Messaging referred to as Public Telephony Service in Page 59/63)
2. **National Data Services** (Non-Numbered Services - Currently NLD & ISP merged with enhanced scope like Leased Circuit/VPN)
3. **International Services** (ILD, CLS, International Internet Gateways, Satellite Based, GMPCS, IFC-Inflight). Reasons in response to Q9.
4. **DCIP:** Entities who can provide passive/active infra to above 3 entities only and should be restricted from acquiring customers/subscribers directly.
5. **VNO/Application Provider:** Using resources from above 4 types of Authorization as reseller of their services.
6. The above can be issued as CAT A (National), B & C to support regional operators.

**Q6 (b) What terms and conditions (technical, operational, security related, etc.) should be made applicable to such an authorisation?**

States have regional rights on security related matters. Currently many telecom cores are deployed in 2-5 zones but service is delivered across the country. If the operators can meet the states requirement, National Authorizations should not be seen as barrier for offering National Authorisations. Currently in few Telecom Circles, States are disjoint/overlapping from



Circles but security requirement has been satisfactorily met with few operators having equipment outside the circles as per DoT Amendment Dt 23JUN17 and rendering the circle concept blurred.

**Location of switches and other network elements:** DoT Amendment No 20-355/2012 AS-I Vol-V Dated 23rd June 2017. The licensee may deploy any of its equipment's anywhere in India subject to the interconnection points being located and operated in the respective service areas for inter operator, inter service area, NLD & ILD calls and meeting the security conditions as mentioned in the license.

**Q9. Whether there is need for merging the scopes of the extant National Long Distance (NLD) Service authorization and International Long Distance (ILD) Service authorization into a single authorisation namely Long-Distance Service authorisation under the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.**

**NO:** ILD needs to be kept as a separate category since it needs International Gateways and has interface points/footprint beyond Indian Boundaries. ILD also needs to be kept under a separate authorisation for following reasons:

- a. Obtaining ILD permissions have been more scrutinized in the past (we refrained from seeking a UL (All Services) as GMPCS would be part of scope. Without obtaining higher security clearance for GMPCS, an UL (All Services) processing would be stalled, even though we were willing to give an undertaking that we do not want Authorization for GMPCS. Instead, we had to apply for Access Circle Wise along with NLD & ILD Separately.
- b. The conditions to start Domestic Service (Access & NLD) are completely different from ILD which requires preapprovals, provisional clearances and final clearances.

**Q15: please refer to response to Q5-Q6**

**Q18: Enterprise/Business Users CAF, KYC for EoDB Ease of Doing Business.**

Most Regulations related to CAF's, KYC, Number Allocation, MNP Porting Database reporting, audit activities etc, are prescribed for individual users/consumers and need to be revised keeping Business Users in mind. (Currently Business Users need to sign multiple CAF's circle wise with circle wise KYC and numbers need to be allocated circle wise in each Business Users circle).

**Q26: Ownership of network and equipment.**

Leasing of active infrastructure should be allowed only to entities having DCIP Authorization as per the DCIP framework proposed by DoT and recommended by TRAI.

**Q33: Transfer & Merger.**

Transfer of License/Authorizations between entities held by common owners should be allowed.

**Q36:** Earlier TRAI recommendation Dt 19.09.2023 can be used as a reference which proposes to reduce entry fee by 50%. For Access service a flat entry fee has been proposed for all circles irrespective of area/market potential. Smaller circles like HP- Himachal Pradesh, Haryana (as the denser Gurugram/Faridabad is under NCR), Punjab, Assam should have an entry fee same as J&K/Northeast or merged.



**Q51:** AGR: Irrespective of number/type of Authorisations held by an entity a consolidated filing and computation of AGR should be allowed just like IT-Income Tax allows for different types of Factories/Warehouses which are spread in many states/IT Circles. AGR setoff should be allowed for any service taken for which AGR has been paid by an input provider (like GST).

**Q61:** The minimum annual fee should be reduced from the current 10% Entry Fee to 1% of Entry Fee.

Please refer Annexure A in next page

THANK YOU



Table of Resources to be shared in the 2 Models 1: VNO Model 2: Converse VNO (Infrasharing between 2 UL Licensees)

	<u>1. VNO Model</u>	
<b>UL1 Parent Host</b>	<b>Pure VNO Child</b>	<b>UL2 as VNO Client</b>
<p><b>UL License1 (Parent Host NSO) :</b> MSC, IMS Core, IP-PSTN Mixing, Number Resources, Interconnection, Legal Intercept, Security</p>	<p><b>Pure VNO (Child-Client):</b> Resell UL Licensee services (numbers of UL License in case of Numbered Services) but responsible for KYC, Customer Acquisition, Billing &amp; Customer Care; Invest in Passive Infra like BTS to extend coverage</p>	<p><b>Similarly a UL License2 (Child-Client) :</b> should be allowed to operate as VNO of UL License1 by intimation without any additional entry fee or authorisation</p>
	<u>2. Converse VNO Model (Sharing Between 2 ULs Host-Client Model)</u>	
<p><b>UL License1 (Host/Server NSO) :</b> MSC, IMS Core, IP-PSTN Mixing, Number Resources, Interconnection, Legal Intercept, Security to self and support to Client</p>		<p><b>UL License2 (Client) :</b> Number Resources, Interconnection, Legal Intercept, Security; KYC, Customer Acquisition, Billing &amp; Customer Care;</p>