

ASIA PACIFIC CARRIERS' COALITION
(Incorporated in the Republic of Singapore)

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Telecom Regulatory Authority of India (TRAI)
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(No. of Pages: 3 Only)

Attention: Shri U. K. Srivastava
Pr. Advisor (Network, Spectrum & Licensing)

Dear Sirs,

APCC's Counter comments to TRAI Paper No. 12/2016 dated 14 June 2016 on Review of Voice Mail / Audiotext / Unified Messaging Services Licence.

The Asia Pacific Carriers' Coalition (APCC) is an industry association of global and regional telecommunications carriers operating in the Asia Pacific region, formed to work with governments, National Regulatory Authorities (NRAs) and users in advocating open market policies and best practice regulatory frameworks in order to promote competition and efficient investment in telecommunications markets. The APCC would also like to thank TRAI for extending it the opportunity to file counter comments on the responses to the original consultation.

The APCC fully endorses ACTO's position (filed in response dated 25th July 2016 to the captioned consultation paper) that it is inappropriate to consider these services to be part of a Unified Licence. The Unified Licence is conceived as a carrier licence for their holders to invest in infrastructure for the supply of carriage services. The services being considered under this consultation are not carriage services, but rather application type services.

Audio Conference service is a platform based service which is configured in a manner to provide service based upon the underlying telecom resource provided by another telecom service provider.

The entity which holds the audio conference license creates the platform which is able to ensure voice communications amongst parties which terminate on the bridge. The bridge / platform rides on the underlying telecom connectivity sourced from authorised telecom operator and not by the entity which holds the audio conference license.

Provision of Voice Mail / AudioTex / Unified Messaging Service should be under a specific registration / authorisation as done for OSPs or IP-1 presently.

- The users of audio conferencing service are primarily enterprise customers who need to communicate both domestically as well as globally using the underlying telecom resources sourced from authorised telecom operators. Therefore the regulations should encourage simplicity and permit all kinds of calls / traffic to be converged on the conferencing platform. The features of Audio Conferencing have taken many forms like plain Audio Conferencing (PSTN and VoIP), Mobile app, Integrated Audio, Desktop app, Browser app etc.
- In the enterprise communications and collaboration market as a whole, growth is driven by converged tools, mobility, cloud services, analytics, and richer integrations. The scope and market of conference service as a whole in view of technological developments have expanded manifold. The total market can be segregated between Audio Conference, Managed Video conferencing, Hosted Video and Hosted Web Conferencing services.

TRAI should support this growth trajectory through its regulations in creating an environment which fosters innovation while embracing technology.

The conference bridge / platform should be technology neutral and need to be permitted for termination of IP and PSTN calls. Regulations should be devised to enable and encourage such interconnections.

This dichotomy between infrastructure / carrier services and Application / Value Added type services is a well-established principle among regulatory regimes around the world. To take some examples:

Malaysia

In the introduction to the Licencing Guidebook published the Malaysian Communications and Multimedia Commission (MCMC) they give a rationale as to the design of the licencing regime. The licensing provisions are designed to allow flexibility to licensing structures. The regime should allow a licensee to undertake activities that are market specific and create opportunities for expansion into the industry and provide for a more effective utilization of network infra-structure.

There are two key types of licence, the individual licence and the class licence. The individual licence requires a high degree of regulatory control and the class licence is a more "light touch" form of licence to promote industry growth and development with easy market access.

The way that this works in practice is that carriage type services come under two types of Individual Licence. These are a Network Facilities Provider (NFP) licence for infrastructure and a Network Service Provider Licence (NSP) for carriage type services. Voice Mail / Audio Tex / Unified Messaging services would come under an Application Service Provider Licence (ASP) which is a class licence. The latter is easier to obtain and is renewed on a yearly basis.

Singapore

Singapore also has a differentiated licensing regime. For carriage services there would be a requirement for a Facilities Based Operators (FBO) if these were being provided with

infrastructure or a Service Based Operators (SBO) individual licence for services without infra-structure. For Audiotex and conferencing services, as with Malaysia there is only a requirement for an SBO (Class) Licence.

Again the rationale is similar to Malaysia – the regime is designed to optimize regulation, with heavier focus on where regulation is considered most necessary whilst encouraging service-based competition and as wide a participation as possible that will drive service innovation and lead to the greatest benefits for Singapore consumers.

Conclusion

The common thread of these approaches is that for application type services there should be as light a regulatory regime as possible with minimum barriers to entry. This will create an environment that will encourage innovation and lead to customers maximizing the possibilities provided by the network.

In light of these points the APCC strongly agrees with ACTO's response to Question 1 of the Consultation that Voice Mail / Audiotex / Unified Messaging / Audio Conferencing services should continue to be subject to a light-touch standalone licence and that there should be no entry fee or minimum equity for a provider of these services.

Thank you.

Yours faithfully



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