



Association of Unified Telecom Service Providers of India

AUSPI/12/2008/100

6th June, 2008

Shri Nripendra Misra
Chairman
Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi - 110002

Sub: AUSPI's Response to TRAI Consultation Paper No. 10/2008 on Carrier Selection

Dear Sir,

We are pleased to enclose AUSPI's Response to TRAI Consultation Paper No. 10/2008 regarding Carrier Selection.

AUSPI requests the Authority to kindly take our views into consideration while coming out with its recommendations on the subject.

Thanking you,

Yours faithfully,


S.C.KHANNA
SECRETARY GENERAL

Encl: As above

Copy to:

Shri A K Sawhney, Member TRAI
Shri R N Prabhakar, Member TRAI
Shri R K Arnold, Secretary, TRAI
Shri Lav Gupta, Principal Advisor (FN), TRAI
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Shri M Kannan, Advisor (Eco), TRAI

AUPSI Response to TRAI Consultation Paper No.10/2008 on 'Carrier Selection'

The Authority has come out with a consultation paper regarding '**Carrier Selection**'. With intense market competitions amongst access service providers, tariff for long distance calls have fallen drastically and hence the present consultation paper regarding Carrier Selection loses the meaning.

Implementation of carrier selection should be put on **permanently hold or abandoned** due the present intense market competition and due to the up gradation cost involved.

We submit below our question wise responses on the various issues raised by TRAI in this consultation paper:

1. *Is there a case for implementation of carrier selection in today's environment?*

No case as yet. It would involve huge cost outgo which could be utilized for connecting the unconnected. The entire aim of carrier selection at this stage is only to benefit the new Long distant players at the cost of development. If the carrier selection has to be introduced then it should be done after certain rollout obligations for new long distance operators are insisted upon to have their access to subscribers in various locations, otherwise it would be only cherry picking for new long distance operators.

2. *Should carrier selected be implemented only in fixed, only in mobile or both?*

We do not consider the necessity of carrier selection in today's environment but if it is implemented then it should be for fixed network.

3. *Should only call-by-call carrier selection (CS) or both CS and Carrier Pre-Selection (CPS) be implemented in the fixed and mobile network?*

If carrier selection is to be implemented then both should be implemented in fixed networks.

4. *In case both CS and CPS are implemented then in view of no major network changes in CS should it be implemented first? Give your suggestion for a reasonable time frame of implementation of CS and CPS.*

As we have mentioned above there is no case for implementation of carrier selection in today's environment. Whichever is implemented first hardly matters.

5. *For what type of calls described in chapter 1 section 3, should carrier selection be implemented?*

If at all carrier selection is to be implemented, it should be implemented in International calls only.

6. *In case of CS what should be the policy for default carrier considering the cost and benefits to the customer.*

Please refer to our response at Q4 Competition in carrier selection will be only if there is a level playing field between the new long distance operators and the earlier licensed one with respect to rollout.

7. *If it is to be implemented in mobile network should CS and CPS be implemented for both prepaid and post paid customers?*

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8. *In what way should carrier selection be implemented for roaming customers?*

There are various difficulties for implementation of carrier selection for prepaid subscribers and for the roaming subscribers. In view of this as we have mentioned in our response above, the carrier selection idea should not be taken forward for implementation.

9. *With reference to section 4 of chapter 1, how do you think the customer should exercise the initial choice?*

The process mentioned in this Consultation Paper is not at all customer friendly. It is only to give advantage to the new entrants of long distance operators. In view of that we find both the methods cumbersome, confusing and not subscriber friendly.

10. *With reference to section 5.4 of chapter 1 in the event of implementation of carrier selection, what should be the procedure followed for activation of CS / CPS to avoid slamming?*

It is not an appropriate time so we again reiterate that we should desist from carrier selection implementation process. However, Regulators/ Authorities need to look into the slamming issue with appropriate regulation.

11. *What should be the mechanism for determination of up-gradation cost? Please suggest the cost recovery method in the present environment?*

Up-gradation cost involves up-gradation of hardware and software of the existing exchanges including billing system for implementation of carrier selection. Determination of up-gradation cost is dependent on the network elements to be upgraded. The actual cost can be assessed only by access providers. All long distance licensed operators should bear the cost of up-gradation in equal proportion.

The up-gradation costs will largely be incurred by fixed line network operators. This investment will be part of their assets and reflected in their balance sheets. The costs should be borne by the concerned operators and not passed on to other operators.

12. *If the cost is recovered from NLD /ILD service providers, then should it be equally distributed among all NLDOs /ILDs or there should be a difference between NLD/ILD carrying voice traffic and not carrying voice traffic. How would a new entrant in the long distance segment contribute towards this cost?*

As mentioned above, the costs should be borne by the concerned operators in their respective network.

13. *What should be the reasonable time frame for implementation of carrier selection separately for fixed and mobile, CS and CPS in both the networks and prepaid and postpaid in case of mobile?*

The entire aim of carrier selection at this stage is only to benefit the new Long distance players at the cost of development. If the carrier selection has to be introduced then it should be done after certain rollout obligations for new long distance operators otherwise it would be only cherry picking for new long distance operators.

14. *Should the billing be necessarily done separately by NLDO/ILDO or left for mutual agreement between access and long distance service providers?*

Billing should be done by mutual agreement between Access providers and long distance providers

15. *Should access provider make arrangement for selection of the NLDO/ILDO Who is not present in SDCA.*

Yes Sir. In case a selected NLDO/ILDO is not present in an SDCA, then access provider should make arrangement for carriage of call through default route.

16. *If the answer to Q15 is yes then what arrangements do you propose for carriage of calls up to the point of presence of selected NLDO?*

In case a selected NLDO/ILDO is not present in an SDCA, then access provider should make arrangement for carriage of call through default route.

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to

28 No Comments