Presentation by
Association of Competitive Telecom Operators (ACTO)

ACTO's Presentation to Secretary, DoT

DoT, Sanchar Bhawan, New Delhi
11th February, 2022

Agenda

- Introduction

- Operational issues

- License Reform related issues

- Q&A

Introduction

❖ **ACTO is an industry association, registered under Societies Registration Act, 1860.**

❖ **Our members are engaged in the business of data and internet telephony services provided to enterprise customers which include, amongst others, multi-cited corporations, Indian BPO/KPO, outsourcing and ITES sector operating global networks under various appropriate telecom licenses including NLD, ILD, ISP and Access Service.**

❖ **ACTO is committed to further India's pro-competitive policies and to partner closely with Ministry of Communications & Information Technology, Ministry of Finance and other Ministries, Government Bodies to enhance the stakeholder's engagement with the specific needs of the enterprise segment.**

❖ **Our members:**

Operation Related: Equipment Procurement From Trusted Sources

Issue in brief:

- Regulatory uncertainty: No trusted products approved, although some vendors approved as trusted source.

- Customer Service Impact: Delay in network expansion and services to customers especially in pandemic situation.

- Expanded Scope: CPE's as well as LIM and Security equipment are also included. Some of these are already tested as per TEC specs.

ACTO's Requests:

- Expedite approval process and make it time bound.

- Exempt CPE and the Security equipment from the purview of NSCS.

- Consider deemed approval approach for products already approved to avoid duplication.

Operation Related: Remote Access(RA) Approval Process

Issue in brief:

- Onerous RA approval process: Resulting in inordinate delays.

- Delayed Network Expansion: RA is critical for new nodes as well as O&M activity for existing nodes.

ACTO's Requests:

- Simplify the current process of prior approval to intimation basis.

- No further inspection/approval in case new node/site is added to the approved RA system.

- Consider doing away with RA approval as part of ease of doing business measures.

Operation Related: Centralized Inspection/Audit by LSAs

Issue in brief:

- Duplication: Periodic inspections/audits conducted by various LSAs on the same TSP under the same License.

- Differing Interpretations: Adds to legal uncertainty and lack of predictability.

ACTO's Requests:

- License inspection/Audit should be conducted at central level.

- The same report can be shared with other LSAs.

License Reform Related: AGR/Multiple Levy of LF

Issue in brief:

- Consistency in AGR Definition: Definition of AGR under various licenses needs to be uniform.

- Pass through charges under ILD/NLD, ISP & Access Service License: Non-uniformity in pass through charges across all licenses leading to ambiguity.

ACTO's Requests:

- Need clear definition or demarcation of telecom/non telecom revenue.

- Consistency of pass through: To keep simple and uniform, instead of using the term pass through charges, it should use the same verbiage as given in UL- VNO license amendments.

License Reform Related: Emerging Technologies/Services

Issue in brief:

- Voice Centric License-Current licenses/policies are primarily written with focus on the consumer/retail voice segment.

- Consider specificity of enterprise customers- Require to address the need of enterprise segment and emerging services.

ACTO's Requests:

- Remove restriction in interconnectivity between PSTN and leased line based CUG/ IPVPN network created in ILDO/NLDO license.

- Allow Internet licensees to create VPN/ any WAN technologies.

- Remove restriction in active infrastructure sharing Between ISPs and NLDO/ILDOs.

License Reform Related: Co-Terminus License Condition

Issue in brief:

- Subsequent authorizations taken under UL license at different times get expired with the end of first authorization even after paying full entry fees.

ACTO's Requests:

- Allow a full period or charge to pro rata entry fees.

License Reform Related: Multi-Parenting in UL VNO Access

Issue in brief:

- Multi parenting is not allowed for wireless.

- For wireline, non-level playing field between UL- VNO access (Cat B) & UL-VNO Access as multi-parenting is allowed using same EPABX for Cat B but not for the latter.

- Restriction a key bottleneck for growth of UL-VNO.

ACTO's Requests:

- Permit multi-parenting under UL-VNO Access Authorization for wireless.

- For wire line, allow multiple NSOs be connected on a particular EPABX with the same conditions of logical bifurcation for UL VNO Access Authorization, as in case of UL -VNO Access Category B.

Thank you !!

Association of Competitive Telecom Operators (ACTO)

Cabin No 40, Second Floor B-1/632. Janakpuri East, West Delhi 110058
Mob: 9899242273
e-mail: info@acto.in web: www.acto.in