

The BPO Council of India/TEMA/CMAI vide this letter is inviting your attention for:

- i) Asking your views on TRAI Consultation paper on OSP/BPO/Unsolicited Calls licensing terms and conditions
- ii) Inviting you for complimentary membership of BPO Council of India promoted by TEMA/CMAI, the telecom association since 1990
- iii) Asking your confirmation to join the Conference to be held in several cities in this behalf.

We seek your view on TRAI consultation paper No 02/2019 to review of terms and conditions for OSPs. Last date to offer comments as on date is 29.4.2019. (If you all agree we can request for extension in date to TRAI).The paper is available at <https://main.trai.gov.in/consultation-paper-review-terms-and-conditions-registration-other-service-providers-osps> The issues raised by TRAI are given below. This is to suggest strategies to DOT, who intends to devise a technology neutral framework so as to promote innovations for setting up the OSP service delivery platform in the most cost efficient manner for faster promotion of OSPs in the Country.

As an OSP licensee, any changes in policy will affect us. This is also time to seek remedies/changes for any problems issues that we may have faced. That will also prepare us for innovations and business models based on new and latest technologies coming up.

TEMA and CMAI, as you all know was established in 1990 for advocacy in telecom and is member of more than 180 Government committees contributing to policy making as also for testing/QA/spectrum/Govt. procurement etc. www.cmai.asia

To address the issues, promote development, business promotion of OSP/BPO/KPO industry, the TEMA/CMAI has promoted a dedicated body called "BPO Council of India". The draft proposed website has been attempted at www.bpocouncilofindia.com All the members would be listed on website with their logo and linkages to their websites.

The membership as of now is complimentary. Shortly we will start the process for finalization of Chairman/President/Executive Members of the body. Regional Chapters would also be started.

After receiving your views, we intend to organize series of conferences in various cities. The participation in the same would be free of charge.

Please send names of your officers to be represented on the BPO Council, company logo/website.

Please separately also send your views by email/written letter on TRAI Paper or any other issues need to be taken up with Government/TRAI/Finance Ministry.

REGARDS

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ISSUES RAISED BY TRAI

OSP/BPOs

Q1. Views on the definition of the Application Service in context of OSP. Whether, the Application Services which are purely based on data/ internet should be covered under Application Service for the purpose of defining OSP.

Q2. Whether registration of OSP should be continued or any other regulatory framework should be adopted for OSPs so that the purpose of registration specified by government is met.

Q3. What should be the period of validity of OSP registration? Further, what should be validity period for the renewal of OSP registration?

Q4. If documents required to be filed are adequate to meet the information requirements for OSP registration? If not, please state the documents which should be added or removed along with justification for the same.

Q5: Views on the fee of Rs. 1000/- for registration of each OSP center.

Q6: Views on the existing procedure of OSP registration for single/ multiple OSP centres?

Q7: Views on the existing provisions of determination of dormant OSPs and cancellation of their registration.

Q8. Views on the terms and conditions related to network diagram and network resources in the OSP guidelines.

Q9. Views on the provisions of internet connectivity to OSP mentioned in the OSP guidelines.

Q10. Views on the provisions related to Hot Sites for disaster management mentioned in the OSP guidelines.

Q11. Views on the provisions of logical separation of PSTN and PLMN network resources with that of leased line/ VPN resources for domestic OSP mentioned in the OSP guidelines.

Q12. Views on the provisions of PSTN connectivity/ interconnection of International OSP mentioned in the OSP guidelines.

Q13. Views on the compliance of terms and conditions including security compliance in case the OSP centre and other resources (data centre, PABX, telecom resources) of OSP are at different locations.

Q14. Views whether extended OSP of existing registered OSP may be allowed without any additional telecom resource. If yes, then what should be the geographical limitation for the extended OSP centre; same building/ same campus/ same city?

Q15. Views as to how the compliance of terms and conditions may be ensured including security compliance in case of the extended OSP centre

Q16. Views on the provisions of general conditions for sharing of infrastructure between International OSP and Domestic OSP mentioned in the OSP guidelines.

Q17. Views on the provisions of Technical Conditions under option -1 & 2 for sharing of infrastructure between International OSP and Domestic OSP mentioned in the OSP guidelines.

Q18. In case of distributed network of OSP, comments about the geographical limit i.e. city, LSA, country, if any, should be imposed. In case, no geographical limit is imposed, the provisions required to be ensure compliance of security conditions and avoid infringement to scope of authorized TSPs.

Q19. Views on the provisions including of logical partitioning mentioned in the OSP guidelines for distributed architecture of EPABX.

Q20. Views on the monitoring provisions of mentioned in the OSP guidelines for distributed architecture of EPABX.

Q21. Views on the scope of services under CCSP/HCCSP, checks required / conditions imposed on the CCSP/ HCCSP including regulating under any license/ registration so that the full potential of the technology available could be exploited for both domestic and international OSP, and there is no infringement of the scope of services of authorized TSPs.

Q22. Comments on monitoring of compliance in case interconnection of data and voice path is allowed for domestic operations.

Q23. Views on the provisions for use of CUG for internal communications of OSP as mentioned in the OSP guidelines.

Q24. Views on the monitoring provisions for use of CUG for internal communications of OSP mentioned in the OSP guidelines.

Q25. Views on the provisions of 'Work from Home' mentioned in the OSP guidelines.

Q26. Whether domestic operations by International OSPs for serving their customers in India may be allowed? If yes, please suggest suitable terms and conditions to ensure that the scope of authorized TSP is not infringed and security requirements are met.

Q27. Whether use of EPABX at foreign location in case of International OSPs may be allowed? If yes, suggest suitable terms and conditions to ensure that the scope of authorized TSP is not infringed and security requirements are met.

Q28. Views on the Security Conditions mentioned in the Chapter V of the OSP guidelines.

Q29. Views on the provisions of penalty mentioned in the OSP guidelines

Q30. Whether OSP to OSP interconnectivity (not belonging to same company/ LLP/ group of companies) providing similar services should be allowed? If yes, should it be allowed between domestic OSPs only or between international and domestic OSPs also.

Q31. In case OSP interconnectivity is allowed, what safeguards should be provisioned to prevent infringement upon the scope of licensed TSPs.

Q32. Views on the miscellaneous provisions mentioned in the Chapter VI of the OSP guidelines.

UNSOLICITED COMMERCIAL COMMUNICATIONS

Q33. What provisions in the terms and conditions of OSP registration may be made to ensure OSPs to adhere to the provisions of the "The Telecom Commercial Communications Customer Preference Regulations, 2018" (TCCCPR, 2018) issued by TRAI on 19.07.2018.

Q34. Stakeholders may also provide their comments on any other issue relevant to the present consultation.