

**Annexure-I**  
**OSPAI's submission to "NTP - 2018"**

We welcome the opportunity to submit Other Service Providers Association of India "OSPAI" comments on "National Telecom Policy 2018 (NTP 2018)" to Department of Telecommunications (DoT). Current OSP Guidelines were last reviewed through industry consultation in 2008. Since then there have been some amendments to the same. OSPAI has been working very closely with DoT and TERM Cells for delivering the benefit of the latest technological know-how to improve faster growth of India BPO/KPO/IT-ITeS industry. In order to fuel the growth of BPO industry, it is imperative that the current OSP guidelines be simplified. To compete with world BPO market, we must make OSP guidelines more industry friendly.

***OSP to OSP connectivity to OSPs providing similar services to meet the industry demand for Third Party Outsourcing***

**Justification:**

1. The concept of third party outsourcing is not new but such practice is being followed by all the manufacturers in the industry e.g. manufacturers of big Cars depend on vendors/ancillary units for the components. These ancillaries handle production of components/parts by a large number of small and medium entrepreneurs. In this way the employment of large number of people is created even in tier II, tier III cities and villages.

Similarly on the same principles, bigger OSPs who get bulk orders from the customers if allowed to interconnect to smaller and medium OSPs, the work could possibly be outsourced to them depending upon their special skill sets. If allowed to do so, it will take the industry to bigger heights. It has very high employment potential since more and more people can be employed.

2. Consequently at the same time it will reduce traffic rush in the metropolitan cities like Gurgaon, Noida, Pune, Mumbai, Bangalore & Hyderabad etc., where most of the Call Centres are concentrated at present.

3. People in villages will get employment wherein internet is being made available by DoT.

We understand that Govt. of UK and other European countries are trying to give a large volume of work to Indian BPO industry.

**Request:**

It is requested that the restrictions imposed by Clause 4(2) of Chapter-III of OSP guidelines allowing interconnection of two or more international OSP of the same company or the group companies only be removed. If such restrictions are removed we may be able to help small and medium entrepreneurs even in villages and tier II, tier III cities and villages.

***Application Services***

**Application Services** providing services using Telecom Resources for Voice traffic including VoIP only. There is no registration required for the Application Services involving Data only. There is no registration required for the Application Services in respect of domestic Captive Call Centers. OSP shall take Telecom Services from authorised Telecom Service Providers licensed in India.

Registration shall be done through on line portal only. If application has not been rejected / asked for additional information within 10 days, it will be deemed to be registered with issuance of registration number from the system. Single OSP registration for one company (no location specific), with the TERM cell where the registered office is

located with details of multiple operational locations (if any). Changes shall be notified on time to time.

#### Terms & Conditions

Duly approved TSP authorised Network diagram shall be submitted online within 1 month.

OSP to OSP connectivity through Licensed Telecom Service Provider shall be permitted subjected to the same being used for OSP services.

OSP connectivity to Customer within India is permitted for sharing of Bandwidth for Data traffic.

Work From Home Agent connectivity is permitted via VPN to nearest OSP centre

Sharing of Infrastructure permitted between International OSP & DOSP with BG of 10L per registration

PSTN to PSTN call bypass not permitted. However PSTN call can be routed to Agent at any location of OSP.

International OSP can interconnect with PSTN at the foreign end.

Technology neutral and strict compliance to:

- No Bypassing NLD / ILD
- Call traceability on real time basis shall be demonstrated when required by LEA/DoT
- OSP will maintain CDRs (IST format) and System logs for one year and provide whenever asked by DoT/LEA.



### ***Definition of Application Services under OSP guidelines***

The definition of Application Service should be limited to Voice only and not data. The term ITES in the definition of "Application Services" also be defined under the OSP guidelines. This will help to bring clarity on the exact applicability and scope of services that would qualify for OSP registration. Currently, this terms ITES is subject to wide interpretations

### ***Work From Home connectivity for OSP projects***

Work From Home with Remote Access VPN should be permitted. The current guidelines for having a point to point dedicated connectivity is difficult to implement due to high cost and lack of flexibility

### ***Soft phone usage on PSTN Infra***

In the light of emerging technology around softphones and its business ease, it will be helpful if DoT clarifies the regulation around soft phone usage (like replacement of PSTN hardphones with softphones) and its integrated usage with other technology like skype (commercial version) etc, allowing the same to be used for OSP and non OSP purposes.

### ***Limited use of PSTN for International Call Center***

Use of PSTN for International OSP operations for the limited purpose of small scale Call Centre projects in India should be permitted. Government may consider prescribing additional conditions to be complied by OSPs if deemed necessary and also the parameters that would classify the operations under the definition of Small Scale Centres like the number of Agents, PSTN phone calls in a day etc.

### ***Location or positioning of EPABX for International OSP centers***

Considering the business needs, it should be permitted to have the EPABX outside India for International operations. This will help to take care of various requirements like maintain call quality, avoid latency, data privacy issues etc.

### ***Uniform approach to OSP guidelines by all TERM Cells***

Emphasis on uniform procedure and interpretation to be followed by all TERM Cells. This will help in better OSP compliances.

### ***Sharing of Phone and Data Infrastructure (LAN & WAN) by OSP***

**Request:** Clarify/permit sharing of Network Infrastructure i.e. LAN & WAN by OSP's for their ICC/DCC & Corporate office use with logical partition on their single EPABX or separate EPABX's.

### ***Connectivity from Client owned IT Environment and EPABX***

**Request:** It is permitted for client to extend their IT (Data and Voice) environment to an OSP site. Global customers prefer extending their infrastructure to outsourced partner so as to maintain quality and control of voice/data traffic. It also provided them with the ability to have a single view/report on performance of outsourced partners i.e. OSP's in India

### ***Allow use of Centralised IP PBX's in India***

**Request:** Permit use of Centralized IP PBX,s by organizations for normal & OSP use. (i) Scenario-1: PBX LOCATED WITHIN India (ii) Scenario-2: PBX located outside India. IP Technology allows use of a centralized PBX. International connectivity and Infrastructure can be maintained centrally.

***Data and Voice connectivity between OSP & International, Global Clients office/PoP in India***

**Request:** Permit Voice and Data connectivity between OSP center and international client's office/PoP in India (to leverage clients WAN infrastructure). There is a cost advantage as existing bandwidth (from Clients India office/PoP) can be used & it eliminates the need new redundant links between the OSP center and clients office/PoP outside India. Stringent SLA driven due to global contracts.

***Use of Managed Voice Services such as VcIPLC (Variable Charge International Private Leased Circuit), MBIC (Minute Based IPLC Circuits), VpIP over MPLS on Pay-Per-Use model offered by authorized telecom service providers in India***

**Request:** Issue circular that OSP's can use these services or notify all TERM Cells not to block usage of these services. The service is offered under the IPLC license agreement by authorized service providers. There is no toll by-pass. Per minute charges are being paid to the telecom service provider. Switching of calls happens outside India. No PSTN connectivity at the India end. PSTN connectivity on foreign end is offered having facility of outbound calling.

***Usage of Internet & Internet Telephony services to transport ICC calls***

**Request:** Permit ICC's to use Internet & Internet Telephony Services as a medium to transport Inbound & Outbound calls. Internet should be treated as another medium (similar to MPLS, IPLC, etc.) to transport call traffic (inbound & Outbound). Internet is currently used by organizations to connect to their clients for data connectivity.

***Internet access from ISP in India***

**Request:** Counter intuitive when out network connectivity is to a global network hub and data center in another region. There is additional cost of setting up a datacenter in another region. There is additional cost of setting up an internet access infrastructure with full



security layer in country when we as a global bank can leverage on our global internet proxy based outside India.

### ***Centralised IVR and DCC***

**Request:** Permit DCC to deploy centralized and shared IVR at its Datacenter/OSP Center, call received to it over Toll Free number / Toll number, after processing as per IVR tree, can be routed to the agents at remote DCC centre over MPLS/Point to Point link by logging into centralized PBX/ACD at DCC Center.

### ***Centralized IVR/PBX/ACD at Client Datacenter – a Non- OSP Location***

**Request:** Client may deploy IVR/PBX/ACD at its datacenter a Non OSP location within India as centralized IVR, call received to it over Toll Free Number / Toll Number, after processing as per IVR tree, can be assessed by agents at remote OSP location over MPLS/Point to Point.

### ***Updating Online Registration Portal with latest inputs and requirements such as amalgamation/mergers***

### ***Permitting higher bit Encryption***

The present bit of Encryption is insufficient for doing fast and smooth and business operations in India. Request to enhance the current bit of encryption to international standards.

### ***Standardization of process/procedures across TERM Cells.***

### ***Merger and Acquisition Guidelines:***

**Merger and Acquisition Guidelines with latest inputs:** The Merger and Acquisition guidelines was not fully incorporated in OSP Guidelines. The procedure which is already in operation is not incorporated in Online Registration Portal and there is a lot of

hardship to complete the Registration process and documentation procedures. At present fresh registration is required for the mergers and amalgamations.

Support for the collaborative, self-regulatory initiatives among industry stakeholders in areas where regulatory action may be justified, use of light touch, flexible, well co-ordinated regime that protects innovation and facilitates rapid cloud market developments.

We request to incorporate OSPAI's views on subjects mentioned in the document. The licence process should be simplified and combined to the extent possible to economise by identifying the bottlenecks, obstacles or hindrances that are making it difficult to do business in India by regulatory intervention.

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