

Ref.: VNOAI/Reg/TRAI/F-007/1610

Date: 16/10/26

To,

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Subject: Request for Discussion on Implementation of TCCCPR Third Amendment Regulations – VNO Compliance and DLT Onboarding Issues

Respected Sir,

With reference to the above subject, the Virtual Network Operators Association of India (VNOAI), along with its member VNOs and office bearers, would like to discuss the implementation of the TCCCPR Third Amendment Regulations, particularly the regulatory compliance requirements applicable to VNOs operating as Access Service Providers.

The proposed discussion will primarily focus on the practical challenges being faced by VNOs in coordinating with their Network Service Operators (NSOs), onboarding onto Distributed Ledger Technology (DLT) platforms, and ensuring compliance with the amended regulations within the prescribed timelines.

The following key points are proposed for discussion with TRAI:

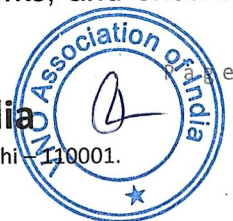
1. Applicability of 5-Paise Charge to VNOs: Clarify whether the VNO or its parent NSO will be treated as the Originating Access Provider for billing and settlement of the A2P termination charge, and ensure there is no duplicate levy.
2. Definition and Identification of A2P Calls: Clarify the applicability to SIP/PRI, cloud telephony, API-assisted calls, click-to-call, agent-assisted calls, delivery services and customer-initiated callbacks, particularly where live human interaction is involved.
3. On-Net and Off-Net Calls: Clarify the treatment of A2P calls terminating within the parent NSO's network compared with calls terminating on other networks, and ensure competitive neutrality between VNOs and NSOs.

Virtual Network Operators Association of India

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4. Non-Discriminatory Charges: Clarify how VNOs can obtain the benefit of Regulation 35A's safeguard linking the termination charge to the TAP's lowest applicable tariff offered to its directly connected Senders/Telemarketers.

5. Exempted Numbering Series: Clarify the practical availability and implementation of 140xx, 1600xx and 1601xx series for eligible VNO enterprise customers, including number allocation, routing and exemption from termination charges.

6. DLT Platform Access: Seek directions for mandatory, real-time DLT access to VNOs through their NSOs under the amended Regulation 13, covering A2P declarations, consent management, UCC complaints and regulatory reporting.

7. NSO–VNO Operational Responsibilities: Clarify the respective responsibilities of NSOs and VNOs regarding CLI declaration, traffic identification, CDR exchange, complaint investigation, blocking and compliance actions.

8. Billing, Settlement and AGR: Seek clarification on the billing methodology, per-minute pulse calculation, audit rights, treatment of disputed charges and applicable AGR/accounting treatment, without duplicate recovery through NSO–VNO arrangements.

9. Implementation Guidelines: Request a uniform Code of Practice, standard NSO–VNO operating procedures and adequate implementation arrangements before enforcement.

Objective of the Discussions

To obtain suitable written clarifications and operational directions from TRAI ensuring that VNOs, as duly authorised Access Providers, can comply with the amended regulations without suffering unintended competitive or financial disadvantages compared with NSOs directly serving enterprise customers.

Thanking you,

For Virtual Network Operators Association of India (VNOAI)


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