

Clarification on Use of IP Telephony Services

Pakistan Telecommunication Authority (the "PTA") has observed that IP Telephony services on managed networks and/ or public Internet are being provided by the licensees outside the scope of their licenses. The Authority, therefore, deems it expedient to issue a clarification to remove the ambiguities and for strict compliance by all. This clarification replaces earlier clarification (s) issued by the Authority on the subject.

FLL/WLL licensee:

1. FLL/WLL licensee is permitted to offer telephony service to its consumers, using any technology, including IP technology but limited within the boundaries of its licensed region to the extent described in its license.
2. FLL/WLL shall not extend its assigned telephone numbers and services, physically & virtually, outside the licensed region by employing any dialing technique/facilities whether the call is inward, outward or both.
3. WLL licensee providing IP Telephony access service shall comply with PTA's Determination on Limited Mobility.
4. FLL/WLL licensee may provide Internet Telephony services (on managed or private internet) within its licensed region on its own access and transport network(if applicable), attached to its own switching/ routing matrix situated within the region, using only private IP addresses, provided:
 - a. Necessary IP probes are installed by the FLL/WLL licensee. Data from the monitoring probes shall be extended online to the "Monitoring and Reconciliation of International Telephony Traffic System (M&RITT)" at PTA's designated premises.
 - b. All outgoing calls outside the region which are not routed through an LDI licensee are blocked effectively by the FLL/WLL licensee.
 - c. All updated consumer antecedents are available with the licensee and forwarded to PTA regularly.
5. FLL/WLL licensee may provide Internet Telephony services (on Internet Cloud or Public Internet) by entering into Interconnect arrangement with LDI licensee for transporting its calls originating on its own access network attached to its own respective switching routing matrices using only private IP addresses, provided:
 - a. Necessary IP probes are installed by the FLL/WLL and LDI licensees for monitoring purposes. Data from the probes shall be extended online to the M&RITT system at PTA's designated premises.
 - b. All updated consumer antecedents are available with the service provider and forwarded to PTA regularly.
6. Nomadic data services are permitted within the licensed region.
7. FLL/WLL licensee shall not use any non-LDI interconnect mechanism for telephony services outside its licensed region.

8. FLL/WLL licensee possessing CVAS license shall neither share its switches, nor routers nor transport systems nor is it allowed to have any type of interconnection between the systems installed for the two types of service categories, except a common access.

LDI Licensee:

9. LDI licensee shall not provide any access service, including IP Telephony access service directly to consumers except to corporate enterprises including R&D and software development houses etc with prior information to and in accordance to the formats specified by the Authority from time to time. Such specialized corporate networks shall have no connectivity with any public network or any other corporate network within Pakistan.
10. LDI licensee can interconnect with FLL/WLL operators for provision of Long Distance and International Telephony Transport Service on call by call and/or carrier pre-selection basis.
11. LDI licensee shall neither extend its any non-geographic telephone number nor assist FLL/WLL allocated numbers to be extended outside Pakistan through its facilities including IP ports.
12. LDI licensee shall ensure that all incoming international telephony calls shall retain their original identity, recognized by PTA and which are as per ITU recommendations. No en-route translation of numbers is permitted which erase actual origination and or termination identity.
13. LDI will provide Call Center, Corporate enterprise, R&D outfits and software development houses information details particularly related to international and domestic links, IP addresses and bandwidth to PTA along-with change updates, which shall be kept confidential unless required by another government office or court of law.

Call Centers:

14. A Call center shall be allowed IP connectivity, whether fiber optic or satellite, provided, it has already registered with PSEB and, this information is passed onto PTA.
 - a. List of Registered Call Centers shall be hosted on PTA website within a week from receiving such information by PTA.
 - b. IP Telephony bandwidth shall be obtained through LDI operators.
15. A Call center shall not be allowed switching between its incoming and outgoing traffic, or distribution of the traffic to any other public telecom system within Pakistan or AJK & NAs.
 - a. In order to consolidate international traffic either originating or terminating into Pakistan, any routing consolidation of traffic done during predetermined hours of the day, day of the week, shall be permitted preferably through the routing mechanisms build into the LDI operators system.

Non-LDI Infrastructure Provider(s)

16. Infrastructure providers can lease or rent out their circuits through a LDI licensee. They shall install probes on all international links and provide relevant data to PTA as and when required.

Note: All licensees are cautioned to provide telecommunication services within the scope of their licenses and adhere to the provisions of the Act, the Rules, the Regulations and the license conditions, otherwise legal action shall be initiated against the violators. Any issue or service relating to IP Telephony which is not covered in the instant clarification must not be assumed as allowed. However, specific clarification should be sought from the Authority. The above clarification is inline with the existing policy directives of MoIT and is subject to revision based on the anticipated comprehensive Policy Review by MoIT.