

Major General (R) Amir Azeem Bajwa HI (M)
Chairman
Pakistan Telecommunication Authority
PTA Headquarters
Islamabad

Subject: **Severe bottlenecks in IP Whitelisting Process**

Dear Sir,

Recent blocking of IP addresses by PTA's web management system (WMS) has created a havoc in Pakistani IT, BPO and Call Center industry. Broadband operators are also partner in this suffering as they serve these customers and interact with PTA for cumbersome, bureaucratic and time-consuming whitelisting process. Many BPOs and call centers have lost their foreign contracts and have started laying off their staff.

2. PTA issued IP whitelisting regulations without consulting broadband operators and IT industry. A limited consultation was carried out mainly with long distance international (LDIs) operators on who are drivers and financiers of WMS. LDIs are direct beneficiary of this system and instead of implementing a balanced approach, whole downstream IT industry and Internet users at large have been made hostage to their profits. Consultation with beneficiaries without involvement of effectees is actually no consultation at all. We have already brought this to the notice of PTA in May 2019 but no action was taken. Protection of Internet users' interests is also a prime obligation of PTA and these key stakeholders have been totally ignored and side lined in this process.

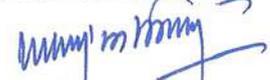
3. Current process of PTA for whitelisting of IP addresses for video conferencing, virtual private networks (VPNs) and VOIP requires more than 10 documents submission by the customers through broadband providers and takes 7-15 days processing by PTA. It's unthinkable that any business in a fast paced world of IT can wait for this long. Before IP blocking, PTA should have been proactive to implement an online portal to address whitelisting requests within an hour. PTA's fee has to be submitted by the operator in form of Demand Draft or Pay Order which requires a lot of manual work and running around. No one gave a thought that in today's world of e-payments, an efficient system could have been easily implemented by PTA to facilitate the industry. Media reports mentioned that \$30 million were spent on installing WMS. Additional investment of few thousand dollars in an online portal could have prevented this havoc and loss of business and reputation to IT industry and country's global branding.

4. In current situation when Pakistan fights corona pandemic and countries are enforcing work from home, remote workers management, education and meetings by video conferencing, etc., PTA is working backwards to block IP addresses to protect certain interest groups.

5. In view of foregoing, we request that IP blocking may kindly be suspended for three months and only be resumed after a broad-based consultative process and implementation of an online portal by PTA which should guarantee processing and approval of requests within 60 minutes.

With kind regards.

Yours sincerely,



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