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**THE TELECOMMUNICATION INTERCONNECTION (AMENDMENT) REGULATIONS, 2018
(4 of 2018)**

**TELECOM REGULATORY AUTHORITY OF INDIA
NOTIFICATION**

New Delhi, the 5th July, 2018

File No. 10-10/2016-BB&PA --- In exercise of the powers conferred upon it under section 36, read with sub-clauses (ii), (iii) and (iv) of clause (b) of sub-section (1) of section 11, of the Telecom Regulatory Authority of India Act, 1997 (24 of 1997), the Telecom Regulatory Authority of India hereby makes the following regulations to amend the Telecommunication Interconnection Regulations, 2018 (1 of 2018) namely:-

1	(1) These regulations may be called the Telecommunication Interconnection (Amendment) Regulations, 2018 (4 of 2018). (2) They shall come into force from the date of their publication in the Official Gazette.
2	In regulation 6 of the Telecommunication Interconnection Regulations, 2018 (1 of 2018) (hereinafter referred to as the principal regulations), after sub-regulation (3) the following proviso shall be inserted, namely:- "Provided that the port charges and infrastructure charges, for all ports provided before the 1 st February, 2018, shall continue to be payable as per the terms and conditions which were applicable to them before the 1 st February, 2018."
3	For regulation 8 of the principal regulations, the following regulation shall be substituted, namely:- "Request for augmentation of POIs ---(1) Every service provider shall provide to the interconnecting service provider, at interval of every six months, its forecast of busy hour

	<p>outgoing traffic, for the succeeding six months, at each POI and the first such forecast shall be provided within sixty days of the commencement of the Telecommunication Interconnection (Amendment) Regulations, 2018 and thereafter on the 1st April and 1st October every year.</p> <p>(2) A service provider may request the other service provider for additional ports at a POI, if the projected utilisation of the capacity of such POI, calculated in the manner as contained in schedule II to these regulations, at the end of sixty days from the date of placing the request, is likely to be more than eighty-five percent and such projected utilization of the capacity of POI shall be determined on the basis of the daily traffic for the preceding sixty days at the POI during busy hour:</p> <p style="padding-left: 40px;">Provided that the service provider shall request for such number of additional ports which is likely to bring the utilization of the capacity of such POI, at the end of sixty days from the date of making request, to less than seventy-five percent.”</p>
<p>4</p>	<p>In regulation 9 of the principal regulations,</p> <p>(a) in sub-regulation (1), for the words “five working days”, the words “seven working days” shall be substituted;</p> <p>(b) in sub-regulation (2), for the words “three working days”, the words “five working days” shall be substituted;</p> <p>(c) in sub-regulation (3), for the words “five working days”, wherever occurring, the words “ten working days” shall be substituted;</p> <p>(d) in sub-regulation (4), for the words “three working days”, the words “ten working days” shall be substituted;</p> <p>(e) in sub-regulation (5), for the words “five working days”, the words “ten working days” shall be substituted;</p>
<p>5</p>	<p>After schedule I to the principal regulations, the following schedule shall be inserted, namely:-</p> <p style="text-align: center;">“Schedule II</p> <p>For given number of channels of POI, its capacity for 0.5% Grade of Service shall be deduced from the Erlang B table. The sample calculation for augmentation of ports of POI is indicated below:</p>

	<p>Considering that Service Provider A has, for its outgoing traffic, existing POI of 600 channels with the Service Provider B, then as per the Erlang B table, the capacity of such POI at 0.5% Grade of Service shall be 562.3 Erlang. Now when the projected outgoing traffic of Service Provider A, at the end of sixty days from today, would be more than 477.95 Erlang (i.e. 85% of the POI capacity), it may request the Service Provider B for augmentation of the POI capacity by such number of ports which takes it to more than 637.27 Erlang (i.e. $477.95/0.75$). As per Erlang B table, this would imply augmentation of ports at such POI by approximately 77 channels.”</p>
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(S.K. Gupta)
Secretary

Note 1: The principal regulations were published vide F.No.10-10/2016-BB&PA dated 01.01.2018 (1 of 2018).

Note 2: The Explanatory Memorandum explains the objects and reasons of the Telecommunication Interconnection (Amendment) Regulations, 2018 (4 of 2018).

**Explanatory Memorandum to “The Telecommunication Interconnection (Amendment)
Regulation, 2018 dated 05.07.2018”**

1. The Authority notified the Telecommunication Interconnection Regulations, 2018 on 1st January, 2018. These regulations came into effect from 1st February, 2018.

2. Some of the stakeholders had written to the Authority stating difficulties in implementing the aforementioned Regulations. Accordingly, meetings with the service providers were held on 9th March, 2018 and 19th March, 2018 at TRAI to understand their perspective. During the discussions in the meetings, the service providers raised mainly the following issues:
 - (a) After conversion of the ports from two way to one way as per the regulation, what will be the status of existing annual port charges being paid between the TSPs.

 - (b) Since TRAI has already prescribed 0.5% POI congestion norm through QoS regulations, there may be no need to have an additional norm of bringing down the POIs capacity utilisation to less than 60%. According to them, currently the POIs are being utilized till as high as 85%-90% of their capacity while still complying with the QoS norm. However, the regulation has specified utilization of POIs to be as low as 60%-70% which is uncalled for as it will lead to inefficient use of network resources leading to unnecessary cost implications.

 - (c) For provisioning of ports in time bound manner, they suggested that in line with the existing practice, the seeker should continue to make a forecast of required port capacity for the next 6 months to enable the other party to dimension its network accordingly.

 - (d) According to service providers, the augmentation of POI capacity is a complex process requiring involvement of multiple domains such as core, transmission, and switching etc. and various technical, commercial, procurement and logistic issues pertaining to these domains and therefore, the time frame of 21 days specified in Regulation becomes a challenge.

3. The Authority examined the issues raised by the service providers and issued “The draft Telecommunication Interconnection (Amendment) Regulation, 2018” on 08.05.2018 for the consultation of the stakeholders. The draft Regulation was placed on the website of TRAI i.e.

www.trai.gov.in for public consultation. Stakeholders were requested to submit their comments by 18.05.2018. The comments were received from 8 stakeholders.

A. Analysis of the Key Issues raised in “The draft Telecommunication Interconnection (Amendment) Regulations, 2018” issued on 08.05.2018.

4. Following were the issues raised for consultation:

(i) *In regulation 6 of the Telecommunication Interconnection Regulations, 2018 (1 of 2018) (hereinafter referred to as the principal regulations), after sub-regulation (3) the following proviso shall be inserted, namely:-*

“Provided that the port charges and infrastructure charges for all ports provided before the 1st February, 2018 shall continue to be payable as per the terms and conditions which were applicable to them before the 1st February, 2018.”

(ii) *For regulation 8 of the principal regulations, the following regulation shall be substituted:*

“Request for augmentation of POIs --- (1) Each service provider shall provide its forecast of busy hour outgoing traffic for each POI, at intervals of every six months, to the interconnecting service provider and the first such forecast shall be provided within sixty days of the commencement of “The Telecom Interconnection (Amendment) Regulations, 2018” and thereafter on the 1st April and 1st October every year.

(2) A service provider may request the other service provider for additional ports at a POI, if the projected utilisation of the capacity of such POI, calculated in the manner as contained in schedule II to these regulations, at the end of sixty days from the date of placing the request, is likely to be more than eighty-five percent and such projected utilization of the capacity of POI shall be determined on the basis of the daily traffic for the preceding sixty days at the POI during busy hour:

Provided that the service provider shall request for such number of additional ports which is likely to bring the utilization of the capacity of such POI, at the end of sixty days from the date of making request, to less than seventy-five percent.”

(iii)

<p><i>In regulation 9 of the principal regulations,</i></p> <p><i>(a) in sub-regulation (1), for the words "five working days", the words "seven working days" shall be substituted;</i></p>
<p><i>(b) in sub-regulation (2), for the words "three working days", the words "five working days" shall be substituted;</i></p>
<p><i>(c) in sub-regulation (3), for the words "five working days", wherever occurring, the words "ten working days" shall be substituted;</i></p>
<p><i>(d) in sub-regulation (4), for the words "three working days", the words "ten working days" shall be substituted;</i></p>
<p><i>(e) in sub-regulation (5), for the words "five working days", the words "ten working days" shall be substituted;</i></p>

(iv) *After schedule I to the principal regulations, the following schedule shall be inserted, namely:-*

"Schedule II

For given number of channels of POI, its capacity for 0.5% Grade of Service shall be deduced from the Erlang B table. The sample calculation for augmentation of ports of POI is indicated below:

Considering that Service Provider A has, for its outgoing traffic, existing POI of 600 channels with the Service Provider B, then as per the Erlang B table, the capacity of such POI at 0.5% Grade of Service shall be 562.3 Erlang. Now when the projected outgoing traffic of Service Provider A, at the end of sixty days from today, would be more than 477.95 Erlang (i.e. 85% of the POI capacity), it may request the Service Provider B for augmentation of the POI capacity by such number of ports which takes it to more than 637.27 Erlang (i.e. $477.95/0.75$). As per Erlang B table, this would imply augmentation of ports at such POI by approximately 77 channels."

5. An analysis of these issues based on the comments and inputs received from stakeholders is presented below:

(1) In regulation 6 of the Telecommunication Interconnection Regulations, 2018 (1 of 2018) (hereinafter referred to as the principal regulations), after sub-regulation (3) the following proviso shall be inserted, namely:-

"Provided that the port charges and infrastructure charges for all ports provided before the 1st February, 2018 shall continue to be payable as per the terms and conditions which were applicable to them before the 1st February, 2018."

6. While some of the stakeholders have opposed the insertion of this proviso, one stakeholder has argued in favour of the proposed amendment. Another stakeholder has stated that as the content /subject matter of the draft amendment is sub-judice in Hon'ble Delhi High Court, the Authority may await the outcome in the matter before making any amendment in the principal regulations.
7. Stakeholder supporting the proposed amendment has suggested that proposed amendment should include such TSPs also who have been issued fresh UL upon expiry of their old access service licences and are continuing with their interconnectivity with other TSPs without renewing their interconnect agreement. As per this stakeholder, responsibility for augmentation of Ports is of other TSP only; hence, it should not be asked to pay for augmentation of Ports, which might also have bearing on various ongoing Court cases on Port Charges.
8. On the other side, the stakeholders opposing the insertion of this proviso have argued that the proposed clause defeats the principle of equity and fairness and goes against the spirit of reciprocity in the interconnection and the regulations. They have also argued that each service provider should bear all expenses and media requirement for their outgoing traffic. As per them, the Regulations cannot mandate that for existing ports, existing terms will continue for the port charges and infrastructure charges. It has also been argued that interconnection charges can either be prescribed by Regulations or mutually agreed. One stakeholder has also argued that once the existing ports gets converted to carry one way traffic, it is impermissible to pay for ports used by other service provider for his outgoing traffic. According to this stakeholder, in line with the amendment to the port charges regulations, even for the existing ports, each party should bear the cost of the E1s required for carrying the outgoing traffic from its network.

9. The argument that since the subject matter of the draft amendment is sub-judice in Hon'ble Delhi High Court, the Authority may await the outcome in the matter before making any amendment in the principal regulations is not tenable. While issuing notice in the matter, Hon'ble Court has not restrained the Authority from taking any further action.
10. As far as the issues relating to renewing of the interconnection agreements on expiry of the licenses and augmentation of ports are concerned, the same have already been decided in the Principal Regulations. These are not the subject matter of the present amendment. Further, this amendment has no relation with the rate of Port Charges.
11. The stakeholders' argument that the proposed clause defeats the principle of equity and fairness and goes against the spirit of reciprocity in the interconnection is incorrect because in all fairness the requirement that for carrying its outgoing traffic, after conversion of ports, each service provider shall seek ports would ensure equity and the reciprocity in the interconnection. Interconnection charges for new ports shall be mutually agreed by the service providers. To implement this decision, the conversion of the existing ports from bothway to one way traffic is necessary. Existing ports and associated infrastructure like co-location space, media used for connecting two service providers' ports etc. have already been put in place as per agreement signed between the two interconnecting service providers. The argument of a stakeholder that once the existing ports get converted to carry one way traffic, it is impermissible to pay for ports used by other service provider for his outgoing traffic is not tenable as the existing ports will continue to be used by both the service providers after conversion also as was being done earlier. The conversion of the existing ports for carrying one way traffic has no bearing on existing infrastructure and therefore, on commercials. While issuing the principal regulations, dated 01.01.2018, it was never the intention of the Authority to have an effect on the existing arrangement between the service providers as far as charges for port and infrastructure charges are concerned. This proviso is only to have clarity, and to avoid any confusion that may arise at later date.
12. Accordingly, the Authority is of the view that as far as the issues relating to charges for the existing ports (provided before 1st February, 2018) are concerned, conversion of these ports from both way to one way should not affect the commercial arrangement already in place between the two connecting service providers.
13. In view of the comments of the stakeholders and further analysis, the Authority has decided that: In regulation 6 of the Telecommunication Interconnection Regulations, 2018 (1 of 2018), after sub-regulation (3) the following proviso shall be inserted, namely:-

"Provided that the port charges and infrastructure charges, for all ports provided before the 1st February, 2018, shall continue to be payable as per the terms and conditions which were applicable to them before the 1st February, 2018."

(2) For regulation 8 of the principal regulations, the following regulation shall be substituted:

"Request for augmentation of POIs ---(1) Each service provider shall provide its forecast of busy hour outgoing traffic for each POI, at intervals of every six months, to the interconnecting service provider and the first such forecast shall be provided within sixty days of the commencement of "The Telecom Interconnection (Amendment) Regulations, 2018" and thereafter on the 1st April and 1st October every year.

(2) A service provider may request the other service provider for additional ports at a POI, if the projected utilisation of the capacity of such POI, calculated in the manner as contained in schedule II to these regulations, at the end of sixty days from the date of placing the request, is likely to be more than eighty-five percent and such projected utilization of the capacity of POI shall be determined on the basis of the daily traffic for the preceding sixty days at the POI during busy hour:

Provided that the service provider shall request for such number of additional ports which is likely to bring the utilization of the capacity of such POI, at the end of sixty days from the date of making request, to less than seventy-five percent."

14. As far as first issue i.e. regulation 8(1) is concerned, majority of service providers have expressed their views either in favour of proposed clause or have not submitted any comments. One service provider while supporting the proposed clause has submitted that in addition, forecast should include number of ports and expected rise in traffic in Erlangs also. On the other side, one service provider has submitted that proposed clause should be dropped. In support of this submission, it has argued that the provision for bi-annual traffic forecast in the draft amendment is just for the purpose of informing the interconnected partners of the impending traffic growth patterns and have no relation with actual demand of E1 ports. According to this stakeholder, this requirement is redundant in view of the continuous process of augmentation of E1s based on past and impending traffic growth. It has been further argued that this will lead to a new Point of contention between a new entrant and TSPs, who would start disputing projections provided for

E1 augmentation. It may also lead to a situation where the incumbent TSPs might refuse immediate augmentation in the absence of availability of traffic projections, which can be submitted only bi-annually. One stakeholder has submitted that interval of the forecast should be reduced to three months in place of six months.

15. The interconnected telecommunication networks of different service providers works as a system, which needs to ensure congestion free completion of voice calls across the networks. To meet this objective, the traffic forecasts at regular intervals are important for planning the expansion of any switching and transmission networks capacities. Especially, it becomes more important when the decisions of one service provider may affect the capacity planning of the interconnecting service provider's network. Forecasting of traffic on biannual basis would provide sufficient information in advance and time to each service provider for expansion of networks. It is expected that, forecasting of traffic would help in ensuring augmentation of POIs within time limit as provided in the regulations. The apprehension that it may serve no purpose and lead to new Point of contention appears to be without any rationale. With sufficient safe guards such as defining of time frame for provisioning of initial interconnection as well as augmentation of POIs provided under TIR, 2018 and the present amendment to the TIR, 2018, possibility of any refusal by the incumbent operators does not appear to be a reality. Accordingly, the Authority is of the view that requirement of providing traffic forecast initially within 60 days and thereafter on a biannual basis is justified. As far as demand for inclusion of number of ports as well as traffic in Erlang in the projection is concerned, with the insertion of Schedule-II, in the present amendment, this issue has already been taken care of.

16. On the second issue i.e. 8(2), divergent views have been received from the stakeholders. Few stakeholders are of the view that the issue of augmentation of ports be left to mutual discussions between operators and no regulatory mandates should be imposed. They have further submitted that 0.5% POI Congestion norm is already laid out; hence there is no need to have any additional norms based on capacity utilization. It has also been submitted by few stakeholders that request for augmentation of POI can be initiated at 90% (instead of 85%) while still having sufficient headroom to undertake augmentation and maintain QoS. Request for augmentation can be made for such additional ports which can bring the utilization to 80%. It has been argued that increased capacity of circuits increases the efficiency utilization of POI. It has also been submitted by a stakeholder that in this regard, it will be helpful if it is clarified both in Regulation 8 as well as in Schedule II, that Busy Hour is clearly defined as Time consistent daily Busy Hour traffic for all trunk groups (& POI locations) in the circle at a network level for a service provider and not use Bouncing Busy Hour (BBH).

17. On the contrary, one service provider has opposed any change in the existing clause of TIR, 2018. It has submitted that the time period of monitoring traffic for preceding 60 days is extensively long for using as projection of traffic for next 60 sixty days as it presumes that the traffic growth will be similar for 4 months, which is highly unlikely. Therefore the existing time period provided under TIR, 2018 i.e. 30 + 30 days is optimum and should continue unchanged. It has further submitted that increase in projected traffic limits and proposed revised timelines of 42 working days for augmentation will substantially increase the risk of POI congestion and call failures. Its argument behind this is that if the traffic is brought down to only 75% post augmentation and the demand is made only at projected traffic utilization level of 85%, then even a slight variation in actual traffic growth will correspond to increased utilization of more than 95%, thus by the time augmentation happens the call failures would have already started.
18. While analysing the comments of the stakeholders, the Authority observed that while ensuring the compliance of POI congestion norms prescribed through QoS regulations, it is also important to ensure optimum utilization of POI capacity. In order to ensure that these self conflicting objectives are achieved, the decision for augmentation of POIs capacities can't be left on mutual understanding of service providers only. Congestion at POIs may have spiralling effect on functioning of the other elements of the network also. Accordingly, it is always advisable to dimension the POIs capacities in such a manner that in most of the situations, congestion on POIs can be avoided. On one side, utilization of POIs at 60%-70% level may lead to inefficient use of network resources, on the other side utilization of POIs at 90% or above level may lead to POI congestion. The Authority further observed that the change in time period from thirty days to sixty days will provide a reasonable window for analysis and provisioning of additional ports. The apprehension that increased level of use (85%) for initiating the request for POI capacity augmentation or increase in duration (60 days) for analysis and projection may cause POI congestion is unfounded. Further, the authority is of the view that Time Consistent Daily Busy Hour Traffic may not give a true picture of actual traffic.
19. In view of the comments of the stakeholders and further analysis, the Authority has decided that: For regulation 8 of the principal regulations, the following regulation shall be substituted:
- “Request for augmentation of POIs** --- (1) Every service provider shall provide to the interconnecting service provider, at interval of every six months, its forecast of busy hour outgoing traffic, for the succeeding six months, at each POI and the first such forecast shall be provided within sixty days of the commencement of the Telecommunication

Interconnection (Amendment) Regulations, 2018 and thereafter on the 1st April and 1st October every year.

(2) A service provider may request the other service provider for additional ports at a POI, if the projected utilisation of the capacity of such POI, calculated in the manner as contained in schedule II to these regulations, at the end of sixty days from the date of placing of the request, is likely to be more than eighty-five percent and such projected utilization of the capacity of POI shall be determined on the basis of the daily traffic for the preceding sixty days at the POI during busy hour:

Provided that the service provider shall request for such number of additional ports which is likely to bring the utilization of the capacity of such POI, at the end of sixty days from the date of making request, to less than seventy-five percent."

(3)

<i>In regulation 9 of the principal regulations,</i>
<i>(a) in sub-regulation (1), for the words "five working days", the words "seven working days" shall be substituted;</i>
<i>(b) in sub-regulation (2), for the words "three working days", the words "five working days" shall be substituted;</i>
<i>(c) in sub-regulation (3), for the words "five working days", wherever occurring, the words "ten working days" shall be substituted;</i>
<i>(d) in sub-regulation (4), for the words "three working days", the words "ten working days" shall be substituted;</i>
<i>(e) in sub-regulation (5), for the words "five working days", the words "ten working days" shall be substituted;</i>

20. Different views have been received from stakeholders in response to this issue. On one side, few stakeholders have argued for increasing the time-period from proposed 42 working days. However, among them, there exist different views. Whereas one state PSU has suggested that the total time frame should be at least 70 days for initial interconnection and at least 60 days for augmentation, some stakeholders have stated that the revised timeline should be of 60 working days considering the intricacies and inter-dependency involved in the activity of augmentation of POI's & some are of the view that the earlier mandate of 90 days is ideal. It has been further

submitted that the compliance should be assessed on the umbrella time period of 60 working days and the days mentioned for each of the activity should be symbolic and indicative. This will provide flexibility to both the interconnected operators while achieving the end purpose within the overall time frame. On the other hand some stakeholders have argued against the proposed increase in the time-period. One stakeholder is of the view that these timelines are excessive, as both parties monitor traffic at POIs and are aware of the impending requirements. Thus the other TSP is also aware of growth of its incoming traffic at the POIs and should be ready for augmentation. Therefore, the timelines are optimum in the TIR 2018 and there is no need to change the same. According to this stakeholder, the draft amendment, if implemented, will increase the risk of call failures and non-compliance with Quality of Service Benchmarks.

21. The Authority is aware of the fact that the augmentation of POI capacity is a complex process requiring involvement of multiple domains such as core, transmission, and switching etc. and various technical, commercial, procurement and logistic issues pertaining to these domains and therefore, the Authority took the cognisance of the representations received from service providers in this regard and proposed to increase the time period for augmentation of POI capacity from 21 working days to 42 working days. Seeking further increase in this duration cannot be justified especially when the provision has been made for each service provider to forecast its busy hour outgoing traffic for each POI, at interval of every six months. Now, there should not be any difficulty in augmenting the capacities of the POIs within the timeframe of 42 working days. On the issue of providing the time-frame in an umbrella form, the Authority observed that this provision may lead to a situation in which promptness of interconnection seeker may provide undue advantage to the interconnection provider. For illustration purpose, if the interconnection seeker pays the amount in one working day and keeps the establishment of transmission link between the POIs ready, the interconnection may be established in a much shorter period as compared to 42 working days. However, if the overall umbrella time-frame is provided then the promptness shown by interconnection seeker may be forfeited by the interconnection provider even without violating the regulations. The argument that the draft amendment, if implemented, will increase the risk of call failures and non-compliance with Quality of Service Benchmarks is far from truth as still 15% headroom would be available for handling of fluctuations in traffic. Further, in cases of emergency, the seeker can reduce this period to 27 working days only by keeping everything ready on its end and responding to the providers' communications on promptly basis.
22. In view of the comments of the stakeholders and further analysis, the Authority has decided to increase the time-frame of 21 working days to 42 working days to ensure provisioning of ports for initial interconnection and augmentation of ports at POIs in a following time-bound manner:

- (a) A service provider, upon receipt of request of ports and collocation space, if required, shall issue letter of acceptance and demand note, if any, within seven working days of the receipt of request.
- (b) A service provider, upon receipt of the demand note, shall pay the amount, if any, within five working days from the date of receipt of demand note.
- (c) The service provider, who issued the letter of acceptance, shall intimate the requesting service provider about the provisioning of the requested ports at the POI and allocation of collocation space, if applicable,--
 - (i) within ten working days from the date of issue of its letter of acceptance, in case no demand note was issued; and
 - (ii) within ten working days from the date of receipt of payment from the requesting service provider against the demand note, in case a demand note was issued.
- (d) A service provider, upon receipt of the intimation about provisioning of the port and allocation of the collocation space, if applicable, shall, within ten working days of the receipt of the intimation, intimate the other service provider about establishment of transmission link between the POIs of the two service providers.
- (e) A service provider, upon receipt of the intimation about establishment of transmission link between the POIs, shall, within ten working days of the receipt of the intimation, carry out acceptance testing and issue final letter of commissioning of the ports to the other service provider.

23. The following illustration demonstrating the various timelines to be adhered to with respect to provisioning of initial interconnection and augmentation of ports at POIs, in case demand note is issued by the service provider, to whom request is made for provisioning of initial interconnection or augmentation of ports is as under:

Maximum period (in working days) for service provider-2 to issue letter of acceptance and demand note, if any, upon receipt of request of ports and collocation space from service provider-1	7				
Maximum period (in working days) for service provider-1 to pay the amount from the date of receipt of the demand note		5			

Maximum period (in working days) for service provider-2 to intimate service provider-1 about the provisioning of the requested ports at the POI and allocation of collocation space			10		
Maximum period (in working days) for service provider-1 to intimate service provider-2 about establishment of transmission link between the POIs				10	
Maximum period (in working days) for service provider-2 to carry out acceptance testing and issue final letter of commissioning of the ports					10