

# पावर ग्रिड कारपोरेशन ऑफ इंडिया लिमिटेड

(भारत सरकार का उद्यम)

## POWER GRID CORPORATION OF INDIA LIMITED

(A Government of India Enterprise)



केन्द्रीय कार्यालय : "सौदामिनी" प्लॉट सं. 2, सेक्टर-29, गुडगाँव-122 001, हरियाणा  
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संदर्भ संख्या/Ref. Number

Ref: C:/Telecom/ TRAI/CLS

dt 08.11.2012

To  
Hon'ble Secretary,  
Telecom Regulatory Authority of India,  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg,  
New Delhi- 110002

Kind Attn : Shri Rajeev Agrawal

Sub: TRAI Consultation Paper No. 14 /2012 on "Estimation of Access Facilitation Charges and Co-location Charges at Cable Landing Stations" dated 19<sup>th</sup> Oct, 2012.

Ref: POWERGRID's earlier submissions dt 29<sup>th</sup> March 2012

Dear Sir,

With reference to the above, please find attached POWERGRID's response to the issues for consultation Paper on "Estimation of Access Facilitation Charges and Co-location Charges at Cable Landing Stations" dated 19<sup>th</sup> Oct, 2012 for your favourable consideration.

We trust that the Hon'ble Authority will find our submissions in order and will duly consider the same while finalizing and detemining the AFC and CLC charges.

Thanking You,

Yours Sincerely,

  
08/11/2012

(S.SUBRAMANIAN)  
Dy. General Manager(Telecom-Core Grp)

Encl: As above.

Copy to:

Shri Arvind Kumar, Advisor (NSL-1), TRAI  
Telecom Regulatory Authority of India,  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg,  
New Delhi- 110002

Consultation Paper on Estimation of Access Facilitation Charges (AFC) and Co-location Charges (CLC) at Cable Landing Stations (CLS) dated 19<sup>th</sup> October, 2012..

### Issues for Consultation & POWERGRID's Response

4. Whether ceiling of uniform Access Facilitation Charges may be prescribed for all Cable Landing Stations in two categories i.e. AFC at CLS and AFC at alternate Co-location, or these charges should be dependent on submarine cable system or location of cable landing stations?

**POWERGRID Response:** We support that the ceiling of uniform cost based access facilitation charges should be prescribed by TRAI for AFC at CLS and alternate collocation in all cases.

5. Whether prescribing the access facilitation charges on IRU basis is required?

**POWERGRID Response:** AFC on IRU basis is required under the present circumstances which will allow service providers to match the contracts looking for IRU Contract term.

6. Whether uniform co-location charges may be prescribed or such charges should be location dependent?


**POWERGRID Response:** TRAI should prescribe ceiling for uniform Access Facilitation charges at CLS and alternate Co-location and continue to prescribe the same.

Q8. Any other comment related to Access Facilitation Charges, Co-location charges and other related charges like cancellation charges, restoration charges along with all necessary details

**POWERGRID Response :** With Reference to the above, it is to submit that standalone NLD service providers have been facing the issue with the Owners of Cable Landing Stations (OCLS) is that when an ILD operator takes Domestic back haul capacity (Say Mumbai-Chennai) from a standalone NLD operator, in order to handover the circuit to the ILD Operator in the "Meet -Me- Room" located in the CLS, the OCLS are reluctant to provide permission to the stand alone NLD operator. They also tend to charge heavily towards co-location charges which are to be paid by the NLD operator directly. Sometimes they delay the approval process to give clearance. In view of this TRAI may prescribe uniform co-location charges for co-locating the access equipments of NLD Operators in the Meet-Me-Room for providing domestic links to ILD Operators.

**Other Issues:** We support the views submitted by the Association of Competitive Telecom Operators (ACTO)

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08/11/2012  
एसओ सुब्रमणियन/S. SUBRAMANIAN  
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