



To,

The Advisor (NSL)
Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg,
Next To Dr. Zakir Hussain College
New Delhi-02

No. Regln/1-16/2012/

Dated: 09-12-2013

(Kind Attention: Shri Arvind Kumar)

Sir,

Sub:- Comments of BSNL regarding the Consultation paper on "Revenue Sharing Arrangements for Calling Card Services"

Kindly refer to TRAI's press release N.79/2013 on dated 14th Nov 2013 vide which TRAI has issues Consultation paper (10/2013) on "Revenue Sharing Arrangements for Calling Card Services".

In this context, point wise comments of BSNL are as follows.

Q.1 Whether the Access Charges to be paid by NLDs/ ILDOs to Access Provider for Calling Cards should be prescribed both for NLD and ILD calls and for ILD calls only?

Ans: Access Charges to be paid to Access Provider, can be decided by mutual agreement between Long Distance Service Provider and the Access Provider. BSNL suggests that this should be done only for ILD calls.

Q.2 As the work done by the Access Provider is the same of NLD and ILD calls, should the originating access charges for NLD and ILD calls be same or different?

Ans. The originating access charges for NLD and ILD calls should be different as both are different businesses and generate different revenue to BSNL. The basis of such charges should not only be the cost of merely access network rather it should also include the cost of operation including human resources involved and current revenue streams from the business for BSNL. Moreover, originating Access Charge for ILD calls should be decided mutually by Access Service Providers and ILD's.

Q.3 What method should be applied for prescribing originating access charge to the Access Provider? Please provide all details including data and calculation sheets, if any?

Ans: Originating access charges to access providers should be left for mutual commercial negotiations between NLD/ILD operators and access providers.

Q4 Whether the Access Charge should be same for Mobile and Fixed Line.

Ans: The Access Charge should be different for Mobile and Fixed Line.

Q.5 What are the issues that need to be addressed to ensure Calling Cards are also used when a subscriber is roaming?

Ans: There will be number of issues for using of Calling Cards, when subscriber is roaming. Use of Calling Cards for making ILD calls, may be restricted within the Home Location Area.

Q.6 What are the prevalent regulatory practices in other countries regarding access charges in case of Calling Cards?

Ans: No comment.

Q.7 Any other relevant information related to subject along with all necessary details?

Ans: No comment.

Yours Sincerely

Sukhdev Singh
DGM (RegIn-II)