"JEEVAN PRAKASH"

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Letter No. _93_/TRAI/12/2014 Date: December 6, 2014

To

The Chairman,

Telecom Regulatory Authority of India,Government of India,

New Delhi - 110002.

Subject: Request for a review of Inter Communication Charges

Dear Sir,

Interconnection is crucial for communicating across networks, and makes it possible for the subscribers of two different operators to communicate with each other. It is essential for extending the scope and efficiency of the telecom network, and is especially important for new operators entering the market who normally use the existing facilities of another operator for providing their services. It therefore is fundamental to a competitive market structure. Interconnection involves a linking up of one telecom operator to the infrastructure facilities of another. Interconnections can be considered in terms of network interconnection and access interconnection. The former takes place between operators possessing networks, and the latter between an operator with a network and another without one.

For ensuring efficiency, costs which form the basis of interconnection charges should be the minimum (or efficient) costs incurred in the long run to provide the service. The basic idea is to simulate price pressures similar to those likely to operate in a competitive environment. Such interconnection charges help sustain the long-term viability of a company that produces high quality services at least cost, and allow more efficient sources of supply to displace less efficient sources within the markets. For the interconnecting operator, they promote efficient decisions with respect to whether to build one's own network facilities or to continue to rely on those of the other operator (i.e. the build-or-buy decisions). Selection of an optimal Interconnection Usage Charges (IUC) regime has emerged as one of the most pertinent and under-addressed issues in the burgeoning telecom sector of the country. In its report submitted to the Honourable Supreme Court, the Telecom Regulatory Authority of India (TRAI) sought opinion of various stakeholders and based on responses, calculated IUC by employing four different methodologies. On such basis, the resultant IUCs ranged from Rs. 0.1 per minute to Rs. 0.19 per minute. However, the regulator concluded in favour of adopting the Bill and Keep regime in the third year following the submission of this report. It recommended a gestation period of two years so that the market could adapt necessary settings before the full implementation of the B&K system.

Network interconnection and call termination charges, which a cellular operator pay to other operators for connecting and completing voice calls on their networks requires for a change. These charges have direct impact on tariffs that end-consumers pay. Although it accepted Supreme Court order in 2011, now almost three years have been lapsed but no step has been taken by the esteemed TRAI. Keeping in mind the growing market of India and its increasing mobile users, we are sincerely requesting TRAIN to rework its policy of inter connection charge and finally provide the necessary benefit to the end users.

Thanking you,

Yours Sincerely,

JEEVAN PRAKASH CHARITABLE TRUST
New Delhi

Shiv Dhar Dubey
(President)