



TCL/RA/TCL/TRAI -CP/2020/03

March 17, 2020

Shri Kaushal Kishore,
Advisor (Finance & Economic Analysis-I),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg (Old Minto Road),
New Delhi 110002

Sub: TCL Counter Comments to TRAI Consultation Paper dated 18.2.2020 on Draft – The Telecommunication Tariff (Sixty Fifth Amendment) Order, 2020 (____ of 2020)

Dear Sir,

Kindly find attached herewith Tata Communications Ltd. counter comments to the TRAI Consultation Paper dated 18.2.2020 on Draft – The Telecommunication Tariff (Sixty Fifth Amendment) Order, 2020 (____ of 2020).

It is requested that the same may kindly be taken on record.

With kind regards,

For Tata Communications Ltd.

(Praveen Sharma)
Authorized Signatory

Encl: a/a.

TATA COMMUNICATIONS

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**TCL Counter comments to TRAI Consultation Paper dated 18.2.2020 on Draft –
The Telecommunication Tariff (Sixty Fifth Amendment) Order, 2020 (___ of 2020)**

We support the comments given by COAI, Airtel and other TSPs. It is our recommendation that TRAI should not withdraw and/or relax the regulatory provisions relating to tariff for SMS introduced by the Telecommunication Tariff (54th Amendment) Order dated 05.11.2012, until there is clear demonstration of effectiveness of new TCCCPR 2018 DLT framework in curbing UCC SMS via the domestic P2P route. The reasons for the same are given as under:

1. TCCCPR 2018 pertains to deployment of DLT technology for better end-to-end control of A2P SMS and spam mitigation. However, since this technology is still under deployment, there is no clarity on the effectiveness of this technology in blocking UCC SMS via P2P route once the technology is fully deployed.
2. Current tariff plans offered by Indian mobile operators mostly allow bundled free SMS packs, thereby making P2P SMS routes extremely cheap.
3. In case TCCCPR 2018 is not able to effectively block UCC SMS via domestic P2P route, Enterprises will move part of their traffic to these cheaper illegitimate P2P routes, thereby leading to drop in traffic and revenues on legitimate A2P routes offered by telemarketers to enterprises.
4. In case TCCCPR 2018 is not effective in blocking illegitimate P2P routes – and tariff provisions in TRAI 54th amendment 2012 are removed – there is an overall risk of proliferation of UCC SMS via these illegitimate P2P routes, thereby adversely impacting mobile subscribers across the country.
