

F.No TRAI CORRES/6/2013/217

Dated 18th March 2013

The Secretary,
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg, Old Minto Road,
New Delhi – 110 002

Kind Attention: Mr. Manish Sinha
Pr. Advisor (F & EA)

Subject: Consultation Paper on Review of Tariff for National Roaming.

Dear Sir,

This is in reference to the Consultation Paper dated 25th February 2013 on the above mentioned subject.

Tata Teleservices's point-wise response to the Consultation Paper is as follows:

Q1: Is competition in national roaming service in India robust enough for leaving the tariff for national roaming service under forbearance? Please support your viewpoint with reasons.

TTL: - The current competition in national roaming service is adequate in India. We are therefore of the view that the tariff for national roaming should be kept as per prescribed ceiling in 44th Amendment of Telecommunication Tariff Order.

Q2: Would it be appropriate to implement the home price rule (HPR) in national roaming service? What is the likely impact of such a regime on fair competition in telecom sector? Please support your viewpoint with reasons.

TTL: - No, TTL believes that the current cost based regime in national roaming should continue.

Q3: Would it be appropriate to implement Home Price Rule (HPR) in national roaming service with the provision of recovery of carriage charge on account of incoming call from the calling party? Please support your viewpoint with reasons.

TTL: - No, TTL believes that the Home Price Rule proposal will lead to increase in local/STD outgoing call charges.

Recovery of carriage cost is not possible from the calling party, as the calling party will not be aware of the location of the destination number whether it will be in the home network or is on roaming.

In case TRAI mandates the announcement, then we would like to inform that the calling party number switch can generate an announcement in case the called party number is roaming in a different circle. However, the same announcement will be played for non roaming local and STD calls also. This will create inconvenience to customers and will also consume switch resources unnecessarily. Charging to the calling party for such calls is possible for post paid

subscribers but it involves huge changes in billing logics. In case of prepaid, there would be many difficulties involved for differential call charging. Hence, we oppose for charging the calling party.

Q4: Would it be appropriate to rationalize the tariff for national roaming service on the basis of present costs? Please support your view with reasons.

TTL: - In our response dated 18th May 2011 on review of IUC, we had suggested to TRAI to reduce the carriage charge ceiling to 50p/min. In case TRAI do so, such reduction can be used for rationalizing the tariff for national roaming service.

Q5: Would it be appropriate to revise ceiling tariff for national roaming service in such a manner that incoming calls while roaming are made free of charge while the cost of incoming calls is recovered through outgoing roaming calls?

And

Q6: In case your response to Q5 is in the affirmative, which of the following approaches would be more appropriate?

(i) With Immediate Effect: viz. by fixing zero tariff for incoming calls and ceilings for outgoing calls while on national roaming allowing recovery of additional cost on account of free incoming calls, from the outgoing calls while on national roaming

(ii) Through a Glide Path: viz. approaching zero tariff for incoming calls in a phased manner (over a period of say three years) and fixing year-wise tariff ceilings for outgoing calls while on national roaming allowing recovery of additional costs on account of progressively cheaper incoming calls, from the outgoing calls while on national roaming

TTL: - No, TTL reiterates that the current cost of incoming call on roaming subscriber should continue. As mentioned earlier doing otherwise will lead to flight of SIMs from one circle to another, causing revenue loss to the operators and the exchequer and could be a security threat.

Also, not all operators have PAN India network coverage and they have to depend on other roaming partners to offer National Roaming Services to their subscribers, hence incoming calls cannot be made free. The recovery of cost of incoming calls from subscribers will definitely put an additional burden on the roaming customers.

Further, the roaming traffic is already very high due to low roaming tariffs. If incoming roaming calls are made free then, it will be quite a challenge for the operators to ensure the QoS as prescribed by TRAI.

Q7: Do you agree that there is no need to prescribe a tariff for video calls while on national roaming?

And

Q8: In case your response to Q7 is in the negative, please support your viewpoint with a detailed methodology to determine the tariff for video calls.

TTL: - There is no need to prescribe a tariff for video calls as such calls are still at a nascent stage. It is reiterated again that the amount of network resources involved in terminating a video call (circuit switched) is more vis-a-vis terminating a basic voice call.

Q9: In case the tariff for national roaming service is set, would it be appropriate to prescribe that the tariff for an outgoing SMS while national roaming should not be more than that for an outgoing SMS from home service area?

And

Q10: In case your response to Q9 is in the negative, please support your viewpoint with reasons. In case you favour prescribing separate ceiling tariff for outgoing SMS while on national roaming, please support your viewpoint with a detailed costing methodology.

TTL: - We reiterate that an outgoing SMS while roaming on other operators should be determined by the Authority keeping in mind the current charging pattern of outgoing SMS while national roaming i.e. on-net and off-net SMS charges as filed by the operators with TRAI.

Q11: Should Special Tariff Vouchers (STVs) with roaming benefits be allowed? Please support your viewpoint with reasons.

TTL: - Yes, it is appropriate to allow special tariff vouchers for roaming subscribers. This will lead to more benefits being passed on to the roaming subscribers thus emerging further national roaming.

Q12: In case your response to Q11 is in the affirmative, what regulatory restrictions should be imposed on such STVs?

TTL: - It should be in line with existing STV structure. TTL strongly recommend that both Roaming STVs and Roaming Combo Vouchers should be allowed. Please note that the subscribers are very well aware of the benefits of STVs and Combo Vouchers. Hence they can have the convenience of topping up their prepaid balance as well as getting benefits of special tariffs through a single transaction while roaming also. Hence, we propose that combo vouchers should be allowed along with the STVs.

Q13: Is there any other relevant issue which should be considered in the present exercise of review of the tariff for national roaming service?

TTL: We request the Authority to ensure that to maintain low levels of tariffs, the roaming interconnects should be made mandatory by the TRAI.

We sincerely hope that our views expressed will be given due cognizance.

Thanking you,

Yours sincerely,

**Anand Dalal
Senior Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
Tata Teleservices (Maharashtra) Limited**