



To

The Advisor (NSL)

Telecom Regulatory Authority of India,
MahanaagarDoorsanchar Bhawan,
Jawahar Lal Nehru Marg,
(Old Minto Road), New Delhi-02

No: Regln/1-2/2012/9332

Dated: 30th Oct, 2019

{Kind Attn: Shri. S.T. Abbas}

Sub: Comments on Consultation paper on "Reforming the Guidelines for Transfer / Merger of Telecom Licenses".

Kindly refer to your office press release 76/2019 dated 19-09-2019, vide which a Consultation paper on "Reforming the Guidelines for Transfer / Merger of Telecom Licenses" was released and sought inputs/ comments from the stakeholders. In this context, kindly find herewith the BSNL comments on the above mentioned consultation paper:

Question 1: What reforms are required to be made in the existing guidelines on Transfer/Merger of Licenses to enable simplification and fast tracking of approvals? Kindly provide clause-wise response along with detailed justification.

BSNL Reply: No Comment

Question 2: Whether mandatory access to MVNOs should be provisioned in the DoT M&A Guidelines to address the competition concerns? If yes, in which cases the access should be mandated and what should be the guiding principles for provision of wholesale access to MVNOs? If no, kindly provide justification.

BSNL Reply: No Comment

Question 3: In your view, what changes are required in the provisions of UL so as to make them unambiguous? Please provide justification.

BSNL Reply: No Comment

Question 4: If there are any other issues / suggestions relevant to the subject, stakeholders may submit the same with proper explanation and justification.

BSNL Reply:

BSNL has faced and continues to face difficulties in realization of dues of merging/ acquiring entities. This office has, in particular, raised the issue of ownership of liabilities consequent to merger of SSSL with RCOM, with DoT as well as with TRAI (Annexure -'A'); however no palpable solution was provided by either DoT or TRAI. Most recently, another issue of merger of TTSL/ TTML with BAL/ BHL has come up - while DoT has not yet endorsed and taken on record the

aforesaid merger and also not yet transferred DoT assets such as MSC codes, LRN, Spectrum etc to the merged/ acquirer entity, and disregarding BSNL request for mandatorily getting endorsement from DoT, BAL/ BHL has operationalised the merger suo-moto on its side of POIs. As a result BSNL is facing a lot of difficulties regarding routing and billing, also causing huge customer hardships – the action by BAL/ BHL is in contravention to Interconnect Agreements/ addenda. Here it is pertinent to mention the fact that though the Licensor has not taken on record the merger, the TSP has operationalised the merger thereby also raising question over the authority of DoT in such matters. Other private TSPs have also operationalized the aforesaid merger. BSNL is a Government of India PSU and cannot bypass the procedures and mandatory endorsement of Licensor and Regulator on such matters. However, in consideration of the present impasse created by BAL/ BHL, BSNL is of the opinion that DoT/ TRAI should have clarified in respect of operationalization of services in such cases to avoid unnecessary hardships to customers

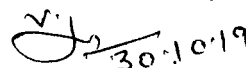
In view of above, BSNL request the Authority to issue specific reforms in guidelines on the following points:

1. A clear and transparent statement on the ownership of liabilities consequent to merger/ acquisition of one TSP with another TSP.
2. DoT and TRAI endorsement should be made mandatory before the merger/ acquisition is operationalised by other TSPs.
3. Exclusive DoT approval for transfer of DoT assets such as MSC codes, LRN, Spectrum etc to the merged/ acquirer entity should be in place and mandatory before such request is placed before other TSPs.

The Authority is requested to kindly consider the BSNL's views/ comments on above mentioned Consultation paper.

Encls:A/A

Yours sincerely



(Ved Prakash Verma)
AGM (RegIn-II)

Regulation Cell,
Corporate Office,
9th Floor, Bharat Sanchar Bhawan,
Harish Chandra Mathur Lane,
Janpath, New Delhi-110001
Ph: 011-23037206 FAX: 011-23322307



भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

No. RegIn/370-2/2013/ 2186

Dated: 10 Sep, 2018

To,
Sr DDG (AS-I)
Department of Telecommunication,
Sanchar Bhawan,
20, Ashoka Road,
New Delhi – 110001

Subject: Acquisition of SSTL by RCOM – regarding realization of outstanding dues of BSNL.

- Ref: 1. This office letter no RegIn/370-2/2013/5317 dated 20/11/2017
2. This office letter no RegIn/370-2/2013/5179 dated 01/11/2017

Dear Sir,

It is brought to your kind notice that subsequent to the acquisition of M/s SSTL by M/s RCOM, both the companies have refused to own up the liabilities of M/s SSTL. M/s SSTL says that post its acquisition by RCOM, all its liabilities have been transferred to RCOM; however M/s RCOM says SSTL is responsible for interconnect agreement which was there between BSNL and SSTL. In between, there exists huge outstanding pertaining to SSTL which BSNL is finding very difficult to realize. Despite our requests, M/s RCOM and M/s SSTL have also not provided Merger Agreement of 02.11.2015 signed between M/s RCL and M/s SSTL, to ascertain which contract/ liabilities have been transferred from M/s SSTL to M/s RCL.

Under such circumstances, kind intervention of the licensor is requested to clarify as to who owns the liabilities of SSTL. Post merger/ acquisitions, it is becoming very difficult for BSNL to realize outstanding from private operators. Merger/ Acquisitions should not be allowed as a tool by private TSPs to cause loss to BSNL. Necessary instructions in this regard may be issued at the earliest so that BSNL is able to realize its outstanding dues.

Kind regards,


10/9/2018
(Harinder Kumar)
GM (Regulation)

Regulation Cell,
Corporate Office,
5th Floor, Bharat Sanchar Bhawan,
Harish Chandra Mathur Lane,
Janapath, New Delhi-110001
Ph: 011-23037206 FAX: 011-23322307



भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

No. RegIn/370-2/2013/ 7516

Dated: 30th Oct, 2018

To,
Sr DDG (AS-I)
Department of Telecommunication,
Sanchar Bhawan,
20, Ashoka Road,
New Delhi – 110001

Subject: Acquisition of SSTL by RCOM – regarding realization of outstanding dues of BSNL.

- Ref: 1. Letter no AS-21/1/2016-AS-V dated 05-10-2018
2. This office letter no RegIn/370-2/2013/7186 dated 10/09/2018

Dear Sir,

Kindly refer to your office letter referred to above at (1) on the aforementioned subject.

In this regard, it is submitted that DoT is the Licensor who grants license and any arrangement of acquisition and merger between parties also needs to be approved by DoT. Scheme of acquisitions and mergers cannot be allowed to be used by the parties to shun their responsibilities, causing loss to third parties such as BSNL. As already intimated to DoT, both the companies i.e. RCOM and SSTL have refused to own up the liabilities of M/s SSTL. M/s SSTL says that post its acquisition by RCOM, all its liabilities have been transferred to RCOM; however M/s RCOM says SSTL is responsible for interconnect agreement which was there between BSNL and SSTL. **Despite our requests, M/s RCOM and M/s SSTL have also not provided Merger Agreement of 02.11.2015** signed between M/s RCL and M/s SSTL, to ascertain which contract/ liabilities have been transferred from M/s SSTL to M/s RCL

Under such circumstances, kind intervention of the licensor is again requested to clarify as to who owns the liabilities of SSTL, post its merger/ acquisitions with RCOM. DoT as Licensor and also as administrative head of BSNL needs clarify and help BSNL to realize outstandings from private operators including SSTL/ RCOM.

Kind regards,


30/10/2018
(Harinder Kumar)
GM (Regulation)



No. RegIn/370-2/2013/8097

Dated: 13th Feb, 2019

To,
Principal Advisor (NSL)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan, Jawahar Lal Nehru Marg,
(Old Minto Road), Near Dr. Zakir Husain College,
New Delhi – 110002

Subject: Acquisition of SSTL by RCOM – regarding realization of outstanding dues of BSNL.

Dear Sir,

It is humbly submitted that even as private TSPs close their services on account of their business needs, merger, acquisitions, etc, they do not clear all the outstandings of BSNL.

In this regard it is submitted that TRAI is the Regulator and fully authorized to ensure and protect payments due to BSNL from other TSPs. In this matter it is further submitted as:

- 1 BSNL is a Government of India PSU and may not be compared with Private TSPs.
2. Any decision with regard to operation, viability and sustainability of BSNL lies fully with the Government of India, unlike in cases of Private TSPs where profitability and business is the driving force.
3. BSNL, being a Government company is always obliged to provide its costly infrastructure and interconnection to other TSPs for their rollout, without any obstruction; however, it has been observed that other TSPs close their services on account of their business needs, merger, acquisitions without making payment of all outstandings of BSNL.
- 4 A recent case was recently referred to DoT wherein both SSTL and RCOM have refused to own the past liabilities of SSTL on account of merger of SSTL with RCOM. With RCOM itself also closing its services, without making payments to BSNL, it has become arduous task for BSNL to recover its dues from SSTL and RCOM. While BSNL was able to recover some outstandings through encashment of Bank Guarantee, recent Interconnection Regulation of linking Bank Guarantee to IUC only and also making BSNL liable to pay Bank Guarantee to other TSPs, things have become very difficult for BSNL. No private TSP is agreeable to furnish Bank Guarantee to BSNL only.
5. In view of above, in matters of merger/ acquisitions of TSPs and also in matter of entry of new TSPs in the sector, it is very important and necessary to protect the interest of BSNL, and accordingly, provisions should be put in place in Regulations to ensure that other TSPs clear all the outstandings of BSNL and obtain no objection certificate from BSNL before closing their services on account of merger, or acquisition, or any other business reasons.



No. Regln/370-2/2013/ 8096

Dated: 13th Feb, 2019

To,
Sr DDG (AS-I)
Department of Telecommunication,
Sanchar Bhawan,
20, Ashoka Road,
New Delhi – 110001

Subject: Acquisition of SSTL by RCOM – regarding realization of outstanding dues of BSNL.

- Ref: 1. Letter no AS-21/1/2016-AS-V dated 31-01-2019
2. This office letter no Regln/370-2/2013/7186 dated 30/10/2018

Dear Sir,

Kindly refer to your office letter referred to above at (1) on the aforementioned subject.

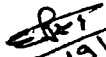
In this regard it is submitted that DoT is the Licensor who grants license and it is understood that any arrangement of acquisition and merger between parties and also closure of services needs consent from the Licensor. In this matter it is further submitted as:

1. BSNL is a Government of India PSU and may not be compared with Private TSPs.
2. Any decision with regard to operation, viability and sustainability of BSNL lies fully with the Government of India, unlike in cases of Private TSPs where profitability and business is the driving force.
3. BSNL, being a Government company is always obliged to provide its costly infrastructure and interconnection to other TSPs for their rollout, without any obstruction; however, it has been observed that other TSPs close their services on account of their business needs, merger, acquisitions without making payment of all outstandings of BSNL.
4. A recent case was recently referred to DoT wherein both SSTL and RCOM have refused to own the past liabilities of SSTL on account of merger of SSTL with RCOM. With RCOM itself also closing its services, without making payments to BSNL, it has become arduous task for BSNL to recover its dues from SSTL and RCOM. While BSNL was able to recover some outstandings through encashment of Bank Guarantee, recent Interconnection Regulation of linking Bank Guarantee to IUC only and also making BSNL liable to pay Bank Guarantee to other TSPs, things have become very difficult for BSNL. No private TSP is agreeable to furnish Bank Guarantee to BSNL only.
5. In view of above, in matters of merger/ acquisitions of TSPs and also in matter of entry of new TSPs in the sector, it is very important and necessary to protect the interest of BSNL, and accordingly, provisions should be put in place in License to ensure that other TSPs clear all the outstandings of BSNL. In matters of merger/ acquisitions of TSPs especially, DoT must ensure

that all outstandings of BSNL, which is a Government of India PSU, is settled before issuing no objection certificate to the TSPs. Even otherwise, some protection must be in place to safeguard financial interest of BSNL and the TSPs must make all payments due to BSNL before closing their services on account of merger, or acquisition, or any other business reasons.

Accordingly, the Licensor is kindly requested that provisions should be made in the License to securitize and ensure payment of all outstandings to BSNL from other TSPs closing their services.

Kind regards,


13/2/2019
(Harinder Kumar)
GM (Regulation)

Regulation Cell,
Corporate Office,
5th Floor, Bharat Sanchar Bhawan,
Harish Chandra Mathur Lane,
Janpath, New Delhi-110001
Ph: 011-23037206 FAX: 011-23322307



भारत संचार निगम लिमिटेड

(भारत सरकार का उपक्रम)

BHARAT SANCHAR NIGAM LIMITED

(A Govt. of India Enterprise)

No. Regn/370-2/2013/ 8518

Dated: 07th May, 2019

To,
Principal Advisor (NSL)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan, Jawahar Lal Nehru Marg,
(Old Minto Road), Near Dr. Zakir Husain College,
New Delhi -- 110002

Sub: Acquisition of SSSL by RCOM – regarding realization of outstanding dues of BSNL.

Ref: 1. Letter no 6-3/2019-BB&PA dated 27-03-2019
2. This office letter dated 19.02.2019

Dear Sir,

Your kind attention is invited to this office letter of even no dated 19.02.2019 on the subject. BSNL had requested the Authority for affecting suitable provisions in Regulations to securitize and ensure payment of all outstanding to BSNL from other TSPs who are closing their services on account of merger/ acquisition.

However, it is humbly submitted that, TRAI, vide letter no 6-3/2019-BB&PA dated 27-03-2019, has instead, referred to TRAI Interconnection Regulations 2018, and stated that such provisions exist which protects the concerns of BSNL.

In this regard, it is humbly submitted that the core issue of TSPs closing their services on account of merger/ acquisition, as raised by BSNL, remains unaddressed. It appears that TRAI has probably mis-interpreted the issue raised by BSNL. The Regulations on interconnection as quoted by TRAI can only be adjudicated, and that too only to a certain extent, on the parties to Interconnect Agreement; however, the same cannot be applied on defaulters who merge/ acquire into another entity. Moreover, disconnection of POI and encashment of Bank Guarantee do not always ensure full realization of outstanding, which apart from IUC, also includes other commercials engagements between the TSPs arising out of interconnectivity. Some matters which delve into Hon'ble Courts and to Ombudsman have substantial amounts at stake and needs redress by TRAI. Further, since interconnectivity is mandatory as per TRAI Regulations, and TRAI has also issued Regulations on Interconnectivity also defining maximum applicable IUC Bank Guarantees for IUC, we understand that TRAI has enough authority to also issue suitable Regulations/ Directions for protection of the impending losses being suffered by BSNL, a Government of India PSU, due to non-payment by other private TSPs, who merge/ acquire into another entity.

In view of above the Authority is requested to kindly reconsider the representation of BSNL vide letter dated 19.02.2019 and put provisions in place in Regulation/ Direction to ensure that other TSPs either clear all the outstanding dues of BSNL and obtain no objection certificate from BSNL before closing their services on account of merger, or acquisition, or any other business reasons; or, submit Bank Guarantee of equivalent amount with BSNL so that BSNL is not at loss. At least, in matters of acquisition and merger, there should be clarity enough on the ownership of the liabilities of merged/ acquired entity and the TSP (s) into merger/ acquisition should be mandated to spell out the same to the Authority and also BSNL and other TSPs with whom it is having interconnection agreement. In this regard, the Authority may also give suitable recommendations to DoT to ensure ownership of liability of TSPs exiting the market.

Kind regards,


(Harinder Kumar)
GM (Regulation)

Regd. & Corporate Office: Bharat Sanchar Bhawan, Harish Chandra Mathur Lane, Janpath, New Delhi – 110001

Website: www.bsnl.co.in



No. 590-02/2018-Regln/ 8919

Dated: 29th July, 2019

To,

Sr DDG (AS)
Department of Telecommunication,
Sanchar Bhawan,
20, Ashoka Road,
New Delhi – 110001

Sub: Merger of Consumer Mobility Business of M/s TTSL/ TTML with M/s BAL/BHL – regarding

Ref: Letter from M/s Bharti Airtel Limited Dated 16/07/2019

Sir,

BSNL is in receipt of letter from M/s Bharti Airtel Limited Dated 16/07/2019 (**copy enclosed**) regarding intimation of merger of the Consumer Mobility Business of M/s Tata Teleservices Limited ("TTSL") and M/s Tata Teleservices Maharashtra Limited ("TTML") with M/s Bharti Airtel Limited ("BAL")/ M/s Bharti Hexacom Limited ("BHL").

In this regard, BSNL has observed the following:

- A. The present issue relates to merger of consumer mobile business of M/s TTSL/ M/s TTML into M/s BAL & M/s BHL.
- B. DoT instructions on merger/ acquisitions dated 20-02-2014 clarifies on merger of License/ service authorization under UL; however, in the present case there is no merger of License/ service authorization under UL, taking place between TTSL/ TTML & BAL/ BHL.
- C. No DoT letter has been provided by M/s Bharti Airtel Limited to BSNL approving merger of consumer mobile business of TTSL into BAL & BHL; and consequent transfer of all assets of DoT pertaining to TTSL viz MSC codes, LRNs etc to BAL & BHL.
- D. M/s Bharti Airtel Limited is, instead, referring to Hon'ble TDSAT order dated 02.05.2019 and 06.05.2019. On perusal, it has been found that Hon'ble TDSAT has passed orders in Pet 21 of 2019 and 22 of 2019 (Bharti Airtel Ltd (And Anr) Vs Union of India) on 02.05.2019 and 06.05.2019; however the case is still pending. Further, complete order dated 02.05.2019 is not available on the Hon'ble TDSAT website. Modification to order of 02.05.2019, passed by Hon'ble

TDSAT on 06.05.2019 is available. The reference in M/s Airtel letter is probably to modification order of Hon'ble TDSAT dated 06.05.2019.

E. We are in also receipt of letter from TRAI wherein TRAI has written to Airtel as:

3. *In this regard, it is to state that TRAI has so far not received any communication/ order from DoT regarding transfer of consumer mobile business of TTSL and TTML to Bharti Airtel Limited. It is therefore requested to furnish the relevant orders issued by DoT on the above subject.*

In view of above, the Licensor is requested to issue instructions/ guidelines with regard to merger of Consumer Mobility Business of M/s TTSL/ TTML with M/s BAL/BHL and action required to be taken by BSNL.

With kind regards

Encls: As above


(Harinder Kumar)
GM (Regulation)

Copy to:

1. Pr Adv (NSL), TRAI, New Delhi – with request to issue necessary guidelines in the subject matter.

Bharti Airtel Ltd.
India & South Asia
Airtel Center, Plot No. 16
Dwarka Vihar, Phase - IV
New Delhi - 110042

www.airtel.in
Call +91 124 424222
Fax +91 124 4248063

Without Prejudice



Letter No: RP/FY 18-19/131/157

16th July, 2019

To

Shri H.K. Makkar
GM-Regulation,
Mahanagar Telephone Nigam Limited
9 - CGO Complex, Lodhi Road,
New Delhi - 110003

Subject: Intimation of merger of the Consumer Mobility Business of M/s Tata Teleservices Limited ("TTSL") and M/s Tata Teleservices Maharashtra Limited ("TTML") with M/s Bharti Airtel Limited ("BAL")/ M/s Bharti Hexacom Limited ("BHL")- Regarding

Reference: Letter No 590-2/2018-Regln-8814

Dated 11 July, 2019

Sir,

We write in reference to your letter dated 11 July, 2019, wherein you have sought the relevant orders issued by DoT with respect to transfer of consumer mobile business of Tata Teleservices Limited/ Tata Teleservices (Maharashtra) Limited ("Tata") to Bharti Airtel Limited/ Bharti Hexacom Limited ("Airtel"):

1. In this regard, it is submitted that the merger between Tata and Airtel has been operationalised consequent to the Hon'ble TDSAT orders dated 02.05.2019 and 06.05.2019 wherein the tribunal has stated thus:
"And the Petitioners will be free to operationalise the spectrum and undertake other consequential activities."
2. The same has been duly intimated to DoT vide letters dated 25.06.2019 (copy enclosed as **Annexure 1**) and accordingly the respective "consumer mobile business" of Tata under their respective license (UL/ UASL) have been demerged from Tata under the Scheme of Arrangements approved by Hon'ble National Company Law Tribunal at Delhi and Mumbai. The said consumer mobile business of Tata, along with their "associated resources" have now, in terms of the Schemes of Arrangement, been transferred to Airtel w.e.f. 01.07.2019.
3. The Hon'ble TDSAT orders permit us to operationalise the spectrum and undertake other consequential activities. The requirement of DoT to issue any letter in this instance or in the instance does not arise.

Keeping in view we request BSNL to kindly change the network routing as per our proposal. (**Annexure- 1**)

Sincerely,

For Bharti Airtel Limited



Ravi P Gandhi
Chief Regulatory Officer
And Authorised Signatory for Bharti Hexacom Limited

Enclosure: As above

Registered Office: Bharti Airtel Limited, 1 Nelson Mandela Road, Vasant Kunj, Phase II, New Delhi - 110 070, India

Tel: +91 124 4242222 | Fax: +91 124 4166 6137 | E-mail: 121@in.airtel.com | Corporate Identity Number: L74899DL1995PLC001444

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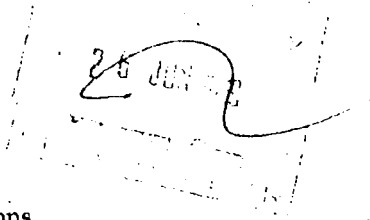
Accordingly, the Authority is kindly requested that provisions should be made in the Regulations to securitize and ensure payment of all outstandings to BSNL from other TSPs who are closing their services.

Kind regards,

H.K.
19/2/2019
(Harinder Kumar)
GM (Regulation)



Ref. No. RP/FY19-20/037/444
Dated: 25th June 2019



To,
Deputy Director General (AS),
Department of Telecommunications,
Sanchar Bhawan, 20, Ashoka Road,
New Delhi - 110 001

Subject: Intimation regarding compliance of Hon'ble TDSAT orders in the transfer of consumer mobile business operations of Tata Teleservices Limited [TTSL] and its consequent merger into Bharti Airtel Limited [BAL] & Bharti Hexacom Limited [BHL] and Appointed Date

Reference:

1. DoT letter No. AS-21/2/2018-AS-V dated 10th April 2019
2. Hon'ble TDSAT order dated 24th April 2019 in Telecom Petition No 24 of 2019
3. Hon'ble TDSAT order dated 2nd May 2019 in Telecom Petition No 21 of 2019
4. Hon'ble TDSAT order dated 6th May 2019 in Telecom Petition No 21 of 2019
5. Joint letter No. RP/FY19-20/037/435 dated 22nd May 2019

Dear Sir,

1. This is with reference to various communications, including those mentioned above, exchanged with DoT regarding demerger of the 'consumer mobile business' of TTSL and consequent merger/transfer of the said consumer mobile business of TTSL into BAL & BHL.
2. In continuation of our letter dated 22nd May 2019, it is submitted that on 30th May 2019, the Hon'ble Special Bench of the NCLT Delhi passed an order further allowing for filing its order of approval of Scheme of Arrangement with the Registrar of Companies (ROC) on or before 25th June 2019. A copy of the said order is attached as **Annexure I**.
3. The ROC filing has been done on 25th June 2019 thereby operationalizing the merger with an Appointed Date of 1st July 2019. The copy of acknowledgement showing the ROC filing is attached as **Annexure II**.
4. In light of the orders passed by Hon'ble TDSAT and the subsequent orders passed by Hon'ble Special Bench of NCLT Delhi, please be informed that:

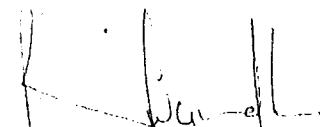


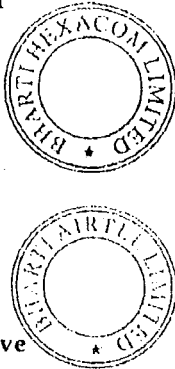


- (i) The merger of Consumer Mobile business of TTSL to BAL & BHL has been completed with an Appointed and Effective Date of 1st July 2019.
 - (ii) All statutory formalities towards operationalizing the demerger of the 'consumer mobile business' of TTSL and consequent merger/transfer of the said consumer mobile business of TTSL into BAL & BHL have been completed with an Appointed and Effective Date of 1st July, 2019.
5. Further, we also request DoT to take the transfer/merger of the 'Demerged Undertaking 1' of M/s TTSL ("Transferor Company") to M/s BAL ("Transferee Company 1") and the transfer / merger of the 'Demerged Undertaking 2' of M/s TTSL to M/s BHL ("Transferee Company 2") on its record as also directed by Hon'ble TDSAT.

Thanking you,
Yours Sincerely,

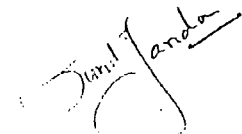
For Bharti Airtel Limited &
Bharti Hexacom Limited


Authorized Signatory
Ravi Parkash Gandhi
Chief Regulatory Officer



Enclosed: As mentioned above

For Tata Teleservices Limited


Authorized Signatory
Sunil Tandon
President - Regulatory & Corporate Affairs

