



[www.tiaonline.org](http://www.tiaonline.org)

10 G Street, NE, Suite 550  
Washington, DC 20002

Tel: +1.202.346.3240  
Fax: +1.202.346.3241

April 23, 2012

Via Electronic Mail to [jafn@trai.gov.in](mailto:jafn@trai.gov.in)

Dr. J. S. Sarma, Chairperson  
The Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan,  
Jawaharlal Nehru Marg  
(Old Minto Road) New Delhi 110 002  
India

RE: TRAI Consultation Paper Regarding Review of Access Facilitation and Collocation Charges of Cable Landing Stations (CLS)

Dear Chairman Sarma:

The Telecommunications Industry Association (TIA) appreciates the Telecommunications Regulatory Authority of India (TRAI) issuing a consultation paper on Access Facilitation and Collocation Charges of Cable Landing Stations (CLS). We trust that a number of our companies and other Associations will file comments.

Following-up on our meeting in December 2011 during the U.S.-India ICT Dialogue, we would like to reiterate the importance of competition, fair access, and following international best practices with regard to access facilitation and collocation charges for cable landing stations. We further advocate that the fee structure for connecting to a cable landing station be made on a cost-oriented basis and that India ensure fair and non-discriminatory access.

We note that current prices to access facilities at cable landing stations are unreasonably high and are not cost-based, and result in barriers to access and constrain the competitiveness of telecommunications operators in the market.

We therefore request that TRAI determine access facilitation charges (AFC) and co-location charges (CLC) based on a transparent process which includes consultation with stakeholders at all levels. We believe that CLS charges have remained extremely high as compared to other economies and that there is significant justification for reducing them.

TIA appreciates your time and consideration and stands ready to work with you as the Indian government moves forward on this and other important issues. If you have any questions about this document, please do not hesitate to contact me at [nfetchko@tiaonline.org](mailto:nfetchko@tiaonline.org).

Sincerely,

A handwritten signature in black ink, appearing to be 'N Fetchko', written over a horizontal line.

Nicolas Fetchko  
Director for International and Government Affairs