

At the outset we welcome TRAI's Consultation on review of Port charges, since the last revision in 2007 further downward revision was long overdue.

Issues for Consultation:

The stakeholders are requested to send their comments on the cost data and costing methodology used for estimating the port charges in this consultation paper. The stakeholders may also send their comments on the period for which these charges should remain operative.

UNINOR response:

The Authority has not given any justification for departure from existing practice of uniform prescribed ceiling rates for MSC and Tandem/ TAX exchange. The table 2.2 of the consultation paper indicates per line price of IP TAX as 50% of the TDM TAX. Currently most of the TAXs are being migrated to IP technology which is giving per line cost close to MSC costs. This is all the more reason that we continue with the uniform ceiling rates based on MSC costs.

We would also like the Authority to address the issue of Port charges, interconnecting media charges and different Industry interpretations of 2 year operative period in line with the Draft NTP 2011 (Src; DOT website), (the same has been approved as NTP 2012) which mandates non-discriminatory interconnection as an objective.

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*25. Mandate an ecosystem to ensure setting up of a common platform for interconnection of various networks for providing **non-exclusive and non-discriminatory access**.*

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TRAI has also not furnished any justification for picking up higher cost quote from the service providers as against the lowest quote. In fact the cost of the most efficient operators should be taken for the purpose of Port charge calculation.

Period for which these charges should remain operative:

There is a need to revisit the port charges regulation every 2 years, as technology is fast changing and consequently affecting the costing methodology and costs.

We hope the above will warrant the Authority's consideration for increased competition and level playing field.