

To,  
Mr. Raj Pal, Advisor (F&EA),  
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## **TRAI Pre-Consultation Paper on Review of Tariff for National Roaming dated 20th December, 2012**

### **VOICE comments are:-**

#### **E- Issues for Pre-consultation**

**(i) Should the present cost based approach for determining tariffs for national roaming continue?**

**(ii) In case your response to issue (i) is in the affirmative, what cost components should be included in the determination of such charges? You may also comment on the information sought by TRAI from the service providers in the proforma placed at Annexure.**

**(iii) In case your response to issue (i) is in the negative, what should be the alternative approach for determining tariff for national roaming? Please support your view with a detailed methodology.**

VOICE COMMENTS: No tariff needs to be prescribed for national roaming, it should be eliminated and let market determine the all inclusive call rates within the maximum tariff for local calls already prescribed for call charges.

**(iv) In your opinion, should the burden of the cost for the incoming call be removed from the roaming subscriber? If yes, how should this cost be recovered? Would removal of the burden of the cost for the incoming call while roaming lead to an increase in overall call traffic across the country?**

VOICE COMMENTS: Yes. There may be an increase basic call rates in the beginning which will normlise subsequently due to-

- Competition as many a plans are already available in the market where no or nominal roaming charges are asked, and
- The withdrawal of roaming charges will lead to increase in traffic compensating the costs

**(v) In your opinion, if the difference between the tariff while roaming and the tariff in the home network is done away with, how would such an arrangement operate within the framework of the present licensing regime? What are the likely issues that may arise upon its implementation?**

VOICE COMMENTS: The subscribers to such entities with limited licensed reach should be well informed before a subscription is sold by these entities. But in reality market forces will ensure that-

- The subscribers to these entities will have such limited need only, or
- These entities will be forced to make arrangements with other service providers to satisfy their subscribers requirement of roaming,
- The tariffs will get normalized between limited and roaming requirements meaning licensees offering roaming may command premium rates vis-à-vis limited reach licensees
- There may even develop a market wherein subscribers go in for 2 SIMs, one for within circle calls and another for roaming calls.

**(vi) In your opinion, is there a need to prescribe a tariff for video calls while roaming? If your answer is in the affirmative, what methodology should be adopted for calculation of such tariff? In case cost based tariffs are to be prescribed, the service providers may kindly provide the cost data and costing methodology to be used.**

VOICE COMMENTS: No tariff needs to be prescribed for video calls, it should be left to market forces within the maximum tariff for local calls already prescribed for call charges.

**(vii) In your opinion, should TRAI also prescribe a tariff for SMS while roaming? If your response is in the affirmative, what method of calculation for such tariff should be adopted? In case cost based tariffs are to be prescribed, the service providers may kindly provide the cost data and costing methodology to be adopted.**

VOICE COMMENTS: No tariff needs to be prescribed SMS while roaming as many a plans are already available in the market where no roaming charges are asked, in fact national SMS packs at very nominal rates. Once again let the competition decide within the overall maximum tariff for local SMS already prescribed.

**(viii) In your opinion, would it be appropriate to allow special tariff vouchers for roaming subscribers?**

VOICE COMMENTS: There is no need for STV for roaming per se should be completely eliminated.

**(ix) Is there any other relevant issue related to ‘tariff for national roaming’ which the Authority should keep in mind while carrying out the proposed comprehensive review of the framework for tariff of national roaming services?**

VOICE COMMENTS: The term “roaming” should be done away with in view of NTP2012 and now the new regime of Unified Access Service (UAS) licensees where spectrum is dissociated from license. This will help in achieving national MNP which is the crying need of subscribers. This will also eliminate additional connections subscribers are forced to take while moving temporarily or permanently from one circle to other.

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