

November 28, 2013

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Mr. Arvind Kumar
Advisor (NSL)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhavan
Jawahar Lal Nehru Marg
New Delhi 110 002

Dear Mr. Kumar

Please find enclosed a copy of our submission in response to the Consultation Paper Number 10/2013 on 'Revenue Sharing Arrangements for Calling Card Services'.

We are of the opinion that the introduction of calling cards would provide a powerful tool in the hands of the consumer to choose a cost effective long distance operator as well as create competition in the sector, as has been demonstrated elsewhere in the world.

Currently, the incoming outgoing ILD traffic ratio is 1:19 tilted towards incoming traffic. The high levels of incoming traffic clearly demonstrate that this is on account of VOIP telephony as well as calling cards. For 2012-13, the outgoing ILD traffic was approximately 4.6 billion. This number can easily go up to 9-10 billion, by a safe estimate, once the cost-effective calling cards are introduced.

The increase in outgoing ILD traffic will also imply that the access charge retention would go up significantly for access service providers. We suggest fixing a percentage of say, 10-15% of the access charge retention for the benefit of the calling card service provider.

The issues mentioned above are further elucidated in the submission, for your kind perusal and consideration.

Season's Greetings & Best Personal
Yours sincerely,
Yours

[Signature]
28 Nov 2013

B.K. Syngal
Senior Principal

Encl: as above

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