

## **7. Videocon Telecommunications Limited**

VTL/Reg/TRAI/1402/3881

January 12, 2014

**Sh. A. Robert J. Ravi**

Advisor (CA & QoS),

Telecom Regulatory Authority of India,

Mahanagar Doorsanchar Bhawan (next to Zakir Hussain College),

Jawaharlal Nehru Marg (Old Minto Road),

New Delhi 110002

**Subject:           Comments on Draft Telecom Communications Customer Preference (Fifteenth Amendment) Regulations, 2014**

Dear Sir,

This is with reference to Draft Telecom Commercial Communications Customer Preference (Fifteenth Amendment) Regulations, 2014 (XX of 2014) published by TRAI on January 29, 2014 for opinion of stakeholders.

At the outset, we would like to submit that the we are aligned with the Authority's opinion that steady steps needs to be taken to stop the UCC peril and support the views of the Authority to discipline the entities whose resources are used for originating UCC.

In regard to the draft regulation, we would like to submit the following:-

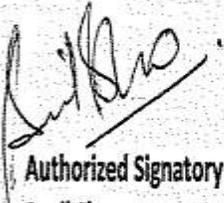
- a. **"Restoration"** should be limited to provisioning of same number which was being used by entity prior to disconnection.  
In adherence to subscriber verification instructions issued by Government of India after disconnection (Permanent Disconnection) of any number the allocation of same number is termed as sale of new connection.

- b. In our opinion telecom resources should only be restored after making a payment of Rs. 5,000/- (Rupees **Five Thousand** Only) for each telecom resource, subject to the condition that the total amount payable by the subscriber shall not exceed five lakh rupees.  
Restoration Charges of Rs. 5,000/- per resource will bring entities into discipline and will results in declining of UCC menace.
- c. Based on the order of TRAI, TSPs have to disconnect and restore the resources which involves operation expenditure, therefore operators should be financially incentivized by passing the monetary benefits of restoration charges via set-off to the financial disincentives being levied to TSPs as defined under the provision of TCCCPR, 2010 (Thirteenth Amendment).

We hope that our views will be considered appropriately.

Thanking you,

Yours sincerely,  
for Videocon Telecommunications Limited



Authorized Signatory  
Sunil Sharma  
DGM (Corporate Regulatory)

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