

Letter No. VTL/Reg/TRAI/1312/3768  
Date: 09-December, 2013

**Advisor (NSL)**  
Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg (Old Minto Road)  
New Delhi — 110 002

**Subject: VTL Response on Consultation Paper on Revenue Sharing Arrangement for Calling Card Services**

**Ref: TRAI Consultation Paper No. 10/2013 dated 14.11.2013**

Dear Sir:

Videocon Telecommunications thanks the Authority to provide an opportunity to respond to TRAI's consultation Paper on "Revenue Sharing Arrangement for Calling Card Services". We hereby submit VTL's response to issues specifically raised in the Consultation Paper:

- 1. Whether the access charges to be paid by NLDOs/ILDOS to access provider for calling cards should be prescribed both for NLD and ILD calls or for ILD calls only?**

It should be for both.

- 2. As the work done by the Access Provider is the same for NLD and ILD calls, should the originating access charges for NLD and ILD calls be the same or different.**

VTL is of the opinion that call access charges for ILD calls need to be higher than that for NLD calls, since the network arrangements for the ILD calls may require high quality and grade of service.

- 3. What method should be applied for prescribing originating access charge to the Access Provider? Please provide all details including data and calculation sheets, if any.**

Access charges should be same as terminating charges.

- 4. Whether the access charges should be same for mobile and fixed line?**

VTL is of the opinion that access charges should be equal.

- 5. What are the issues that need to be addressed to ensure calling cards are also used when a subscriber is roaming?**

Visiting network should not have direct settlement with the NLD Operator. It should be through the home network operator and roaming agreements needs to be suitably amended to incorporate the revenue share on account of Calling Cards.

6. **What are the prevalent regulatory practices in other countries regarding access charges in case of calling cards?**  
&
7. **Any other relevant information related to subject along with all necessary details.**

Calling cards are very popular & very much in use in foreign countries. Call Rates are much cheaper by using calling cards in comparison to international roaming charges.

Thanking you.

Yours sincerely,

for **Videocon Telecommunications Limited**



**Advisor — Regulatory**

**+91 8800315599**