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Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhavan,
Old -Minto Road, Near Zakir Husain College,
New Delhi – 110 003

Subject: ISPAI response to TRAI Draft Telecommunication Tariff (Fifty Ninth Amendment) Order 2014 dated 2.09.2014

Dear Sir,

At the very outset, we would like to express our thanks and gratitude to the Authority for having considered ISPAI representations on the subject and providing some relief to the smaller ISPs in respect of regulatory compliance liabilities which are imposed upon them.

The background of our request was that there are several smaller ISPs who are offering internet services but do not have the requisite manpower in expertise for the purpose of reporting the tariffs and such local entrepreneurs basically follow the plans of their upstream ISPs by and large. In this connection while the Draft TTO meets most of the objectives, there is one important gap which we wish to bring to the kind attention of the Authority.

The organizational set up of Category-C ISPs which have district based operations is very small and consists of only operative staff who are not well versed on compliance issues. It would therefore be in the fitness of the things that Category –C ISPs are also exempted from the requirement of tariff filing irrespective of the number of broadband connections being provided by them.

We would request your kind consideration on the above issue and once again thank you for having considered our representation and coming out with the Draft Telecommunication Tariff (Fifty Ninth Amendment) Order 2014 dated 2.09.2014.

Looking forward for your favorable consideration.

Thanking you,

With Best Regards,
For Internet Service Providers Association of India



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