

VIL/LT/14-15/281  
14 October 2014

**Telecom Regulatory Authority of India**  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg  
New Delhi – 110 002

Kind attn. : Shri Manish Sinha- Advisor, F&EA — T  
Subject : **Response to the TRAI Draft "The Telecommunication Tariff (fifty Ninth amendment) Order, 2014"**

Dear Sir,

This is in reference to the Draft Amendment to the Telecommunication Tariff Order, 2014 dated 24<sup>th</sup> September 2014.

We firmly believe that since this draft TTO pertains to tariffs, the tariff reporting requirement should be uniform across all telecom service providers. We also believe that there is no linkage between number of subscribers of an operator with the regulatory obligations of tariff reporting.

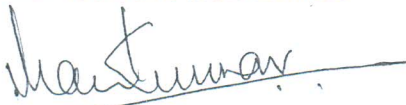
In light of the above, we suggest that in *clause 7 of the Telecommunication Tariff Order, 1999, in sub-clause (i)(b) "Provided also that nothing contained under this sub-clause shall apply to any Internet service provider during a financial year if the total number of its subscribers is less than ten thousand on the last day of the preceding financial year"*, we submit that any special exemption based on licensing, services offered and any exemption based on subscriber base count may not be introduced.

However, clause 7 (i)(a) of TTO'99 is acceptable and a similar exemption as granted to access providers may be extended to all ISPs irrespective of the size of their subscriber base.

We would request the Authority to conduct a comprehensive and holistic review of the TTO and the various amendments including penalty provision, so that the Authority's objectives are met but along with that the cost of regulatory compliances are also optimized.

Thanking you.

Yours sincerely,  
For **Vodafone India Limited**



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