

19th May 2025

Mr. Vijay Kumar,
Advisor (Financial & Economic Analysis),
Telecom Regulatory Authority of India
Tower F, NBCC World Trade Centre,
Nauroji Nagar, New Delhi-110029

Subject: Pre-consultation Paper on “Review of Tariff for Domestic Leased Circuits (DLCs)”

Dear Sir,

This is with reference to the Pre-Consultation Paper on “Review of Tariff for Domestic Leased Circuits (DLCs)”.

In this regard, please find enclosed our brief response to the pre-consultation process, we hope this shall be given due consideration by the Authority.

This is for your kind information and consideration.

Thanking you,

Yours sincerely
For **Lightstorm Telecom Connectivity Private Limited**



Rajiv Nayyar
Director

Email: rajiv.nayyar@lightstorm.net

Brief inputs by Lightstorm

We recommend the following:-

- The DLC market is flourishing as the prices offered in the market are at discount to the ceiling rates defined in TTO for DLC.
- The market demand is growing for new technology VPN, MPLS, SD-WAN in the enterprise segment. The SLA for this type of bandwidth is mutually agreed between enterprise customer and service provider, hence no need for omnibus regulation.
- **There is no need for ceiling tariff regulation in the DLC segment**, however in case TRAI feels then the status quo should be maintained with no fresh regulations.

In addition, there are other related issues that should be included in the present consultation for building resilience and market growth.

- **Building resilience through infrastructure sharing** – The transmission equipment should be permitted to be shared between licensees without restriction.
- **Route diversity** – More intra-city routes should be opened for sharing between transmission companies and telecom companies
- **Enterprise regulation** – The present set of regulations governing customer acquisition, tariff reporting, service quality, security conditions and infrastructure sharing, requirements of IPDRs etc. are aimed for retail segment. These regulations do not squarely apply to enterprise segment. We recommend that a stakeholder consultation should be conducted and segregation of regulations w.r.t. enterprise segment should be done and notified.
- **Redundant infrastructure** – The license has specific conditions on infrastructure build for security agencies, however these are redundant and not put to use. These should be removed as part of license reforms.