



**MAR 02, 2026**

To: Shri D Manoj, Principal Advisor F&EA, TRAI  
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**Sub:** ZooM response to TRAI CP on Domestic Leased Circuits (DLCs) No 01/2026 Dt 23JAN26 on MPLS VPN DLCs.

Dear Sir,

**About ZVC India Pvt. Ltd. (Zoom India):** Zoom India has obtained All India Unified License (Access Service) for all 22 **circles** and our PoI Interconnection with all operators is primarily through connecting to their MPLS VPN Ports by obtaining links/circuits & MPLS Ports from the respective operators.

***TRAI Q3:** Should the MPLS-VPN DLCs be brought under the tariff regulation framework? Please provide your response with justification.*

**Zoom Response to Q3: YES for MPLS Ports/Ethernet/ SD WAN Ports/P2P (excluding local leads).**

**Zoom Response to Q14, Q18 & Q20: TRAI To Publish Prevailing Prices (benchmarking approach of Australia):** Instead of cost analysis & tariff regulation, we suggest TRAI can publish prevailing prices.

- A. TRAI Can collect billing information from operators and publish prevailing rates by operator anonymously (SP1,SP2..) for various capacity and distances (like in Annexure to Schedule IV of THE TELECOMMUNICATION TARIFF (FIFTY SEVENTH AMENDMENT) ORDER, 2014.
- B. Collection of information can be done on an annual basis and published once a year. This will help customers to refer to this information and help them negotiate fair prices with Service Providers. This will also avoid TRAI getting into cost analysis, which may be complex.
- C. Absence of prevailing price information over the last decade is reflected in steep discounts reported by operators (Refer CP Page 37 TRAI Table 2.4). While one operator SP-3 seems to have a fair discount rate of 20% closer to their base tariff, many are steeply discounted between 59%-98% defeating the meaning of a base tariff. Moreover, operators do not share their base tariff rates. Customers are in the dark about what a fair price is.

We suggest the above benchmarking methodology to bring in transparency without burdening operators to share cost information and TRAI doing a cost analysis. Our above proposal is quite similar to the Australian benchmarking approach.



**For Access Service POI Interconnections, as we must obtain connectivity from all operators our experience is as below:**

- i. Two operators have offered reasonable fair price for circuits.
- ii. Two operators start at very high prices and later reluctantly reduce prices after multiple rounds of negotiations which has delayed our Pol's.
- iii. One operator has charged us very high prices which essentially is an XC- Cross Connect within the same building.
- iv. **One Operator is using a decade old list price.** This operator offers 50% to their smallest customers but insists on 100% list price from us, as they consider us as their competitors, and are of the view that we don't deserve discounts/market rates offered to their other small customers whose annual billing is significantly less than our annual billing. This has resulted in:
  - a. We are paying exorbitant prices in the order of 3 to 4 times what we pay to other operators.
  - b. **Request Authority to recommend operators to offer discounts for circuits for Pol/Interconnections at par with prevailing rates & discounts offered to their other customers.**
  - c. **Request Authority to mandate PSU operators to publish rates on an annual basis which are more realistic than decade old, outdated prices.**

**In conclusion** we suggest **TRAI To Publish Prevailing Prices** as detailed in our response in the first page to **Q14, Q18 & Q20**. This will bring sufficient transparency without burdening operators from sharing cost information and TRAI doing a cost analysis.

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Thanking You,  
For and on behalf of ZVC INDIA PRIVATE LIMITED (Licensee)

**DINESH K  
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