

No.: 111/TRAI/2016-17/ACTO

Dated: 27th October, 2016

Shri S. K. Mishra  
Pr. Advisor (F&EA)  
Telecom Regulatory Authority of India  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg,  
New Delhi-110002

**Subject: ACTO's Counter Comments to TRAI Consultation Paper No 19/2016 dated 19<sup>th</sup> August 2016 on Spectrum Usage Charges & Presumptive Adjusted Gross Revenue for Internet Service Providers & Commercial Very Small Aperture Terminal Service Providers**

Dear Sir,

This is with reference to the comments filed vide by Association of Competitive Telecom Operators (ACTO) vide letter No. 109/TRAI/2016-17/ACTO dated 13th October, 2016 on TRAI's Consultation Paper No. 19/2016 dated 19th August 2016 on Spectrum Usage Charges & Presumptive Adjusted Gross Revenue for Internet Service Providers & Commercial Very Small Aperture Terminal Service Providers

We have reviewed comments received from stakeholders. The comments of just one stakeholder have expressed a view which is not in line with ACTO. That itself suggest that there is no merit in the concept itself.

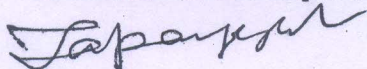
In addition to our comments provided vide letter dated 13th October, 2016, we would like to file our counter reply to such comments for the kind consideration of Hon'ble Authority.

We hope that our counter comments (enclosed as Annexure - I) will merit consideration of the Hon'ble Authority.

Thanking you,

Respectfully submitted,

Yours sincerely,  
for Association of Competitive Telecom Operators



Tapan K. Patra  
Director

Encl.: As above

