



Mob: 99654 69766

Email: litigantsindia@gmail.com

LITIGANTS WELFARE ASSOCIATION

Regd.

(Promoted exclusively to protect the interest of Innocent litigants)

18/37, South Vellala St., Pandamangalam, Woriyur,
Tiruchirappalli – 620 003
Tamil Nadu

**The Chairman,
Telecom Regulatory Authority of India,
New Delhi – 110 002**

Kind attn. - Shri Arvind Kumar, Advisor
(Broadband & Policy Analysis)

Dear Sir,

Sub: Our (CAG of TRAI) suggestion in consultation paper on Review of
Interconnection Usage Charges – reg.

We most respectfully submit the following as our suggestions in this consultation paper for your kind perusal and consideration in the larger interest of telecom consumers of our Nation:

We would like to submit the following generic grievances of the telecom consumers for your kind perusal before submit our view in specific:

1. The regulator is striving to take good initiative to provide better service to the consumers by releasing the numbers of Consultancy Paper in various subjects. But all consultancy papers, comments and counter comments are only in English. Considering present tele -density (around 80% of our Citizens are using mobiles, TV Channels and major percentages are using mobile data. But, in many of the consultation papers, the comments posted from the consumer side only single digits. It clearly shows; how many telecom consumers in our National is capable in posting comments after knowing your Consolation papers.

2. While on the subject, these types of consultations may be made available through posting in all the regional languages, for getting wider views comments, considering at present, the telecom services are reaching out to the grass root levels.
3. This task may handover to your CAG by paying nominal charges. They post the consultancy papers with in their local language and collect the comments and send the consolidate view to TRAI though English to take final decision.
4. The service providers are deducting mobile phone balance in excess using of data. This seems as exorbitant. If there is no balance in data, they may stop access or allow some minute with warning at the rate of some minimum charges. It is alleged some providers are deducting Rs.800/- for mere 30 minutes of excess usage of data access.
5. If the consumers disconnect or close their speech with a minute when it close, it shows as usage time as 1 minute 1 second; but they deduct charges for 2 minutes, these are unfair trade practices.

Issues for Consultation

In view of the recent technological developments in the telecommunication services sector, which of the following approaches is appropriate for prescribing domestic termination charge (viz. mobile termination charge and fixed termination charge) for maximization of consumer welfare (i.e. adequate choice, affordable tariff and good quality of service), adoption of more efficient technologies and overall growth of the telecommunication services sector in the country?

- (i) Cost oriented or cost based termination charges; or
- (ii) Bill and Keep (BAK)?

Please provide justification in support of your response.

Ans. BAK is preferred since it is easier for the callers and no confusion regarding call termination charges.

Q2: In case your response to the Q1 is 'Cost oriented or cost based termination charges', which of the following methods is appropriate for estimating mobile termination cost?.

- (i) LRIC+ (ii) LRIC, (iii) Pure LRIC –

Ans. Not applicable; presently this will be applicable since this is the cheapest and basic cost recovery is ensured.

Q3: In view of the fact that the estimates of mobile termination cost using LRIC method and LRIC+ method yielded nearly the same results in year 2011 (as filed in the Hon'ble Supreme Court on 29.10.2011) and in year 2015 (as estimated for the Telecommunication Interconnection Usage Charges (Eleventh Amendment) Regulations, 2015 dated 23.02.2016), would it be appropriate to put to use the estimates of mobile termination cost arrived in the exercises of year 2011 and year 2015 in the present exercise?

Ans. NO

Q4: If your response to the Q3 is in the negative, whether there is a requirement of running the various LRIC methods afresh using the information on subscriber, usage and network cost for F.Y. 2015-16 for estimation of mobile termination cost?

Ans. YES

Q5: In what manner, the prescription of fixed termination charge as well as the mobile termination charge from wire-line networks as 'zero' through the Telecommunication Interconnection Usage Charges (Eleventh Amendment) Regulations, 2015 is likely to impact the growth of the Indian telecommunication services sector as a whole? Please support your viewpoint with justifications.

Ans. Just like petrol bunks the customer knows how much data he has used at that particular sitting and accumulation without zero is misleading confusing. Many will not remember or recollect the previous readings. So termination charge from ZERO will lead to confidence build up as well as ensure transparency to a higher degree.

Q6: Whether termination charges between different networks (e.g. fixed-line network and wireless network) should be symmetric?

Ans. YES.T SHOULD BE SYMMETRIC.

Q7: Which approach should be used for prescribing International Termination Charge in the country? Should it be kept uniform for all terminating Networks?

Ans. SHOULD BE KEPT UNIFORM FOR ALL TERMINATION CHARGE IN THE COUNTRY .

Q8: Whether, in your opinion, in the present regulatory regime in the country, the stand-alone ILDOs are not able to provide effective competition owing to the presence of integrated service providers (having both ILDO and

Ans. YES

Q9: If your response to the Q8 is in the affirmative, which of the following approach should be used as a counter-measure?

(i) Prescription of revenue share between Indian ILDO and access provider in the International Termination Charge; or

(ii) Prescription of a floor for international settlement rate (levied by ILDO upon the foreign carrier) for international incoming calls; or

(iii) Any other approach (please specify)

Please provide justification in support of your response.

Ans.PRESCRIPTION OF A FLOOR FOR INTERNATIONAL INCOMING CALLS.

W thanks and regards.

**A.Rajan,
Secretary.**