

Subject: **Counter Comments on review of IUC**

To: cp@traf.gov.in, interconnection.traf@gmail.com, sksinghal@traf.gov.in

Cc: moc-office@gov.in, mcitoffice@gov.in

Date: 11/03/19 09:42 PM

From: NAMRATA MIGLANI-DM <namrata.miglani20@bimtech.ac.in>

Dear Sir,

We'd like to draw your kind attention to the following points please:

1. In 2011, TRAI had published a discussion paper on IUC and thereafter filed the recommendations of its in an affidavit in the Hon Supreme Court in October 2011 following public hearings and detailed consultations. TRAI had recommended reducing the IUC to 10 paise in 2012 and thereafter to zero in two years upon becoming convinced that the IUC must be decreased over a period of time to zero - also known as 'Bill and Keep regime'.
2. TRAI had listed out many benefits of lower Bill and IUC and Keep regime i.e (i) improved capacity utilization to lower telecom tariffs (ii) typically in the interests of customers, (iv) IUC functions as a hurdle for reducing tariff. If IUC is eliminated there'll be tariff innovations top to lower tariffs. Over seven years later, the suggestions are still to be fully implemented, although phone users have been looking out for the total roll out.
3. IUC was cut down by TRAI to six paise a second from fourteen paise a second in 2017 with an announcement by TRAI that it is going to become zero starting 1st January 2020, according to the view that costs incurred by operators will drop. TRAI also agreed in 2017 that the move to cut IUC was justified at a moment when communication apps are actually starting to be much more common, resulting in a decrease in voice traffic.
4. In a shocking U-Turn, TRAI has come out with another round of consultation activity on the subject titled "Issues related to Interconnection Regulation, 2017 on 25th September, 2019 and possibly plan to extend IUC regime which we think is actually uncalled for and anti consumer decision. We're also confident that the continuance of IUC regime is going to affect the perception of Hon'ble Prime Minister on "DIGITAL INDIA" and the recent speech of his in Boston (USA) that "DATA Is actually NEW GOLD".
5. TRAI had earlier submitted that lower termination charge helps the customer, it doesn't have a damaging impact on the telecom operator since it's open to the operator to recover whatever cost it incurs through the list tariffs, subject to competitive market conditions.

Thus, the proposed consultation process is actually uncalled for and might have been positioned to help few telecom operators despite the fact that prevalent use of mobile communication technology to achieve gains in social goals has been the basis off the present Indian government's ' Digital India' drive.

Hence there's a need to fix costs to end consumers as small as we possibly can. A lot to the detriment of customer interest, IUC functions as a barrier to reduction in Tariffs. Consequently, we request you to take up the problem and get it resolved to pave the way for introduction of pro-consumer and pro-technology Bill & Keep policy for huge interest of the nation.

Thanking you

With Regards

Yours sincerely

Namrata Miglani

PGDM 2018-20

Sec C

Class Representative (2018-20)

Executive Member- Alumni Conduit

Executive Member- BIZMARK

Birla Institute Of Management Technology

Greater Noida