



Interconnection TRAI <interconnection.trai@gmail.com>

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## Response to the TRAI Consultation Paper on Review of Interconnection Usage Charges by Shyam Spectra Private Limited

1 message

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amit.kumar@spectra.co <amit.kumar@spectra.co>

Tue, Dec 10, 2019 at 4:26 PM

To: "sksinghal@trai.gov.in" <sksinghal@trai.gov.in>, Interconnection TRAI <interconnection.trai@gmail.com>

**Kind Attention: Shri S.K. Singhal, Advisor (BB&PA)**

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Dear Sir,

We are herewith submitting our response on Consultation Paper on Review of Interconnection Usage Charges dated 8<sup>th</sup> November 2019 for your kind consideration.

Thanking you.

Regards,

**Amit Kumar**

Manager – Regulatory

Shyam Spectra Private Limited

*(formerly known as Citycom Networks Private Limited)*

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## Spectra's response on Consultation Paper on Review of Interconnection Usage Charges

- 1) **Keeping in view the changes happening in the international telephony market structure, is there a need for change in the regulatory regime for International Termination Charge (ITC) i.e. change the existing regulatory regime from fixing uniform rate of ITC to an alternate approach? Kindly justify your comments with supporting arguments.**
- 2) **If your response to the Q1 is affirmative, then what should be the alternate approach? Kindly elucidate the alternate approach and benefits of the same vis-à-vis the present approach.**
- 3) **If your response to the Q1 is negative, then in the changing international telephony market structure, what other regulatory measures are required to be taken by the regulator for protecting the interests of Indian consumers and service providers? Kindly justify your comments with supporting arguments.**
- 4) **Your comments on any other issue related with the international termination charges may also be given.**

Response:

The work done for terminating the calls by Access Service Provider is same of for domestic & International calls. In view of the same International Terminating Charge is to be brought equal to domestic termination charge and if it may be considered to be done in two stages:

Stage 1: Reduce the ITC to 15 paisa/minute

Stage 2: make it equal to Domestic Termination Charge

The way there is a carriage charge for NLD, there should be carriage charge for ILDOs as well.

It will also help to discourage OTT calling, thereby arrest security concern and ultimately encourage competition among the operators.

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