

VIL/LT/18-19/125  
31<sup>st</sup> October 2018

**Shri U. K. Srivastava**  
**Pr. Advisor (NSL)**  
Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg (Old Minto Road)  
New Delhi – 110 002

**Subject** : Vodafone Idea Limited response on the Consultation Paper on Estimation of Access Facilitation Charges and Co-location Charges at Cable Landing Stations dated 18<sup>th</sup> October 2018

**Reference** : TRAI Consultation paper on Estimation of Access Facilitation Charges and Co-location Charges at Cable Landing Stations issued on 18th October 2018

Dear Sir,

This is in reference to Consultation paper on Estimation of Access Facilitation Charges and Co-location Charges at Cable Landing Stations issued on 18th October 2018.

Please find enclosed our comments on the questions raised in the captioned consultation on estimation of Access Facilitation Charges and Co-location Charges at Cable Landing Stations issued as Annexure A.

We request you kind consideration and support on our submissions.

Thanking You

Yours Sincerely,

For **Vodafone Idea Limited**



**Vineet Kumar**  
Vice President - Regulatory Affairs

**Vodafone Idea response to the consultation paper on estimation of access facilitation charges and Co-location charges at Cable landing Stations**

**Question No. 1.**

What should be the 'utilization factor' for determination of annual access facilitation charges, annual operation and maintenance charges for capacity provided on IRU basis, and co-location charges in the Schedules appended to "The International Telecommunication Cable Landing Stations Access Facilitation Charges and Co-Location Charges Regulations, 2012" dated 21.12.2012 ?

**Vodafone Idea Response:** In our view, there is a need to keep sufficient head-room on the network for upgrades and rerouting for cable failures. Accordingly, utilization factor based on which the cost allocation is to be done, should be in 50-60% range.

**Question No. 2**

What should be the 'conversion factor' (refer Para 2.22) for determination of annual access facilitation charges and annual operation and maintenance charges for capacity provided on IRU basis in the Schedules appended to "The International Telecommunication Cable Landing Stations Access Facilitation Charges and Co-Location Charges Regulations, 2012" dated 21.12.2012?

**Vodafone Idea Response:** We agree with the conversion factor of 2.6, as has been an industry accepted practice.

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