ASIA PACIFIC CARRIERS' COALITION

(Incorporated in the Republic of Singapore)

By Email & Post

Our Ref: SS/RSN/RCS/sco/308688/1

7 November 2012

Telecom Regulatory Authority of India Mahanagar Doorsanchar Bhawan, Jawaharlal Nehru Marg New Delhi 110 002 India

Attention: Mr Rahul Khullar

Honourable Chairman

Email: ap@trai.gov.in

Dear Sir,

International Telecommunication Access to Essential Facilities at Cable Landing Stations (Amendment) Regulations, 2012.

The Asia Pacific Carriers' Coalition (APCC) would like to thank the Honourable Authority for issuing the amendment on the International Telecommunication Access to Essential Facilities at Cable Landing Stations (Amendment) Regulations, 2012 and also for inviting response to the consultation paper on Estimation of Access Facilitation Charges and Co-location Charges at Cable Landing Stations.

We believe that after passing the amendments, the AFC and CLC will be more in line with the other international markets.

We also request you to make these amendments applicable to those operators with existing agreements with the CLS owners as otherwise they will be at a competitive disadvantage.

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Yours Faithfully

Simon Smith President

Asia Pacific Carriers' Coalition