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No.RP/FY13-14/081/030

Dated: 9th December, 2013

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To,

Shri Arvind kumar
Advisor (NSL)
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
J.L. Nehru Marg, (Old Minto Road),
New Delhi – 110 002

Sub: Consultation Paper on Revenue Sharing Arrangement for Calling Card Services

Ref: TRAI Consultation Paper No. 10/2013, dated 14.11.2013

Dear Sir,

This is with reference to your above mentioned Consultation Paper. In this regard, please find enclosed our response for your kind consideration.

Thanking you.
Yours Sincerely
For Bharti Airtel Limited

Ravi P. Gandhi
Chief Regulatory Officer (Policy)

Encl : As Above

Response to TRAI's Consultation Paper No. 10/2013 dated 14th November 2013 on Revenue Sharing Arrangements for Calling Card Services

In the Consultation paper various issues ranging from the very need for mandating access origination charge for NLD/ ILD Calling Cards to the quantum of charge has been put up for consultation. However, before embarking onto such quantitative issues, we would first like to articulate some fundamental issues that need to be considered:

- In 2003, the Authority introduced the Calling Party Pays (CPP) Regime along with Calling Party Network Pays (CPNP). Given the fact that termination being the monopoly of the terminating service provider, the Authority has fixed the termination charges which are to be paid to the operator in whose network the call is terminating. A ceiling has also been mandated with respect to NLD carriage to take care of affordability as well as competition in the carrier segment. However, origination charges are kept under forbearance primarily to enable operators to recover costs that could not have been recovered via termination as well as to provide the operators adequate flexibility to roll out innovative tariffs and pursue its business independently. The IUC regime has since then followed this policy of forbearance on origination. Any attempt to now mandate a fixed access origination charge is akin to regulating originating charges. Such a fundamental change requires a review of the entire IUC regime and the very concept of CPP/ CPNP. Setting up a standard access origination charge would eventually lead to an unbundling of the access network which is neither a policy mandate nor an outcome that has been put through a consultation exercise of its own. Since this is an extremely important issue, we believe a larger consultation exercise on the issue is warranted.

- Moreover, with the introduction of Unified License, the very concept of different licenses has been done away with. Now any operator can take a Unified License and provide all services Access, NLD, ILD, ISP, VSAT etc. under the same license. Therefore, in the changed scenario there is no need to mandate selling of calling cards by the NLD/ ILD operators. Any NLD/ ILD operator desirous of providing Calling cards may migrate its license to Unified License which will enable them to provide all access services including the prepaid calling cards.

- The amendment to the NLD/ ILD License which allowed NLD/ ILD operators to sell calling cards limited its scope to the services defined in the respective licenses i.e. carriage of switched bearer telecommunication services over a long distance/ international long distance. Since NLD/ ILD Licensees are not allowed to sell access services, calling cards can be provided in one of the two following ways:

    a) By taking a tolled local access number from access service providers wherein the access service provider has full control over charging the customer for the local access and NLD/ ILD operator collecting on the tariffs/charges for carriage and termination.

    b) Alternatively, NLD/ ILD operators can approach access providers to provide toll free access for the calling cards sold by them. In such circumstances, the NLD/ ILD operators are the customers to the access providers for local access and need to enter into a commercial arrangement for the same. Such arrangements should not be mandated with fixed access origination charges.

We would further like to put forth our submissions/ guiding principles to evaluate the need for Calling Cards and to subsequently arrive at a mechanism for determining a fair and equitable revenue sharing arrangement.

1. **Benefits to consumers:**

While we completely endorse the Authority's objective to ensure benefits to consumers in the form of lower tariffs and innovative services, we submit that the Indian telecom sector is currently dominated by a multitude of telecom players in all segments, be it Access, National Long distance or international long distance services. Indian telecom service providers operate in a highly competitive environment, and as a result offer amongst the lowest tariffs in the world.

The tariff plans currently available offer STD tariffs as low as local call rates. ISD rates are equally competitive. For example; ISD tariffs to US/ Canada are available at 60 paisa per minute under tariff recharge whereas ISD tariffs to 30 countries are available for approx. Rs. 2.50 per minute. A list of competitive tariffs offered by various service providers in the Delhi Service Area is also attached as Annexure – I. As is evident, STD /ISD calling plans are quite affordable and there is no dearth of options available to the users. Consumers also have the option to migrate to other access providers in case the customer finds better tariffs there.

It may also be worthwhile to mention that STD and especially ISD calling is used by affluent people who have a higher than average paying capacity. Greater margins on ISD calls help, to an extent, in subsidizing the local calls. Low income customers, primarily making local calls, account for 90% of the subscriber base. A further reduction in ISD tariffs may lead to a rise in local tariffs, impacting the affordability of mobile services to the masses.

Technological advancements have also paved the way for much economical and cheaper alternate outgoing/ incoming international route to customers in the form of OTT applications/ services such as Skype/ Viber. Many consumers have adopted the use of such tools resulting in a significant displacement of outgoing/incoming international traffic that would have otherwise utilized telecom networks.

Another important concern for consumers as well as service providers is Quality of Service (QoS). At present, the quality of service is maintained by the originating service provider, a party solely responsible and liable to consumers for any lapses or deficiencies in service quality. In the case of calling card services, the liability of QoS still remains with the originating operator while call routing and revenue collection is controlled by the NLD/ ILD calling card operators. Any deficiency in services that can be entirely attributed to NLD/ ILD operators, would not be apparent to consumers, who would perceive said deficiencies as a fault on the part of originating operators. It is also entirely plausible that consumers plagued by such issues would contact call centers of originating operators for resolution. Calling cards sold by operators other than the access service providers will thus pose a daunting and seemingly impossible challenge vis-a-vis to completely alter the mindset of consumers with respect to provision of services.

2. **Address the issue of imbalance of international traffic:**

The consultation paper by the authority rightly recognizes the disparity between ILD outgoing and incoming minutes. The ratio of incoming to outgoing calls has increased from three times to sixteen times over the last 7 years. This implies that today for every outgoing call from India, the country is receiving 16 incoming international calls (as against the ratio of 1:3 in 2005-06).

This imbalance of traffic warrants a deeper analysis in the matter. The present termination charge on Incoming ILD calls to India (40 paisa/minute) is amongst the lowest termination charges prevailing worldwide while the average termination rate paid by Indian operators is estimated at approx. Rs 3.50/minute for outgoing international calls. This incongruity in termination rates has created a pricing arbitrage of Rs 3.10 /min in favour of international operators leading to an abnormally high imbalance in incoming calls to India vs. outgoing calls from India.

The Indian operators' costs towards termination charges for outgoing calls are much higher in comparison to the revenue earned by them in the form of termination charges paid by foreign operators. This imbalance has led to:

- Indian customer subsidizing the calling costs for international operators.
- Adverse impact on profitability of Indian telecom operators.
- Lost opportunity to earn higher foreign exchange by the country.

To induct competition, termination rates for incoming ILD calls should be increased. This would enable operators to:

- Offer more competitive ILD outgoing rates
- More investments in infrastructure thereby improving the Quality of Service
- Earn valuable foreign exchange for the country

Assuming there is no reduction in inbound traffic volume into India post termination charge increase, the opportunity cost associated with this increase in termination rates for incoming traffic could be as high as $ 3.6 bn p.a. in incremental forex earnings as is shown below.

Incoming Minutes	:	68 billion per annum
MTR rate increase	:	Rs 3.10/min (increase from current Rs 0.40/min to International Average Rs 3.50/min)
Forex Earnings	:	Rs 210 billion per annum (~ $ 3.6 billon per annum)

3. **Equitable revenue share between Access, NLD/ILD Operators:**

The Authority would agree that compared to other categories of licensed operators, access operators make heavy investments in networks and manage the complete life cycle of subscribers from acquisition, verification, billing and servicing. The entire CAPEX/OPEX related to access subscriber's life cycle lies with the Access provider by deploying high cost access equipment such as BTS/BSC/MSC and other core network equipment's while NLD/ILD operators rarely contribute towards the same and their role is solely limited to carriage. The cost of installing the IN architecture by NLD /ILD is miniscule as compared to the gigantic network costs deployed by the Access Provider.

Investments by NLD and ILD operators do not match up to those made by access providers. As per current estimates, 95 % of the investment is by access service providers compared to approx. 5% by the Long Distance/ International Long Distance operators.

To ensure adequate recovery and return on investments for each operator, any revenue sharing arrangements between access providers and NLD/ILD operators should be equitable and commensurate with the investments made by each. A level playing field will be ensured if the total revenue post deduction of termination charges is shared between the originating and transiting operator on the basis of investments made by the respective operators. Failure to do so may cause irreversible damage to investments made by access operators while enriching the NLD/ILD operators at the cost of investments made by access operators.

Before submitting a detailed response on the fixation of origination access charges for IN based long distance calling cards, the preliminary submissions against this action are as follows:

a) Mandating access origination charge is anti-extant IUC regime.
b) Regulating access origination charges in calling cards amounts to unbundling of access network which has neither been the intention of Authority nor DoT at the time of enabling provisions for calling card services to NLD/ILD operators. No consultative process has also been followed for the same at any point in time.
c) Withdrawal of flexibility granted by the Authority to recover costs from origination charges by the originating network is against the ethos of IUC regime.
d) This will lead to an inequitable change in IUC regime indirectly and in isolation without causing a corresponding change in the relevant components of IUC framework.
e) If access origination charges are to be fixed, they should be on revenue share in direct proportion to the investments made by the Access and NLD/ ILD operator.
f) Authority's conclusion of non-presence of effective competition in the NLD/ILD tariffs is incorrect.
g) Asymmetry in international traffic is due to very low termination charges in India. Hence, rates for terminating international incoming calls to India should be increased to reduce disparity.

Considering the above, we would like to make the following submissions on the questions raised by the Authority in this consultation paper:

Q1. Whether the access charges to be paid by NLDOs/ ILDOs to access provider for calling cards should be prescribed both for NLD and ILD calls and for ILD calls only?

Bharti Airtel's Response:

With the introduction of Unified License, the very concept of different licenses has been done away with. Now any operator can take a Unified License and provide all services Access, NLD, ILD, ISP, VSAT etc. under the same license. Therefore, in the changed scenario there is no need to mandate selling of calling cards by the NLD/ ILD operators. Any NLD/ ILD operator desirous of providing Calling cards may migrate its license to Unified License which will enable them to provide all access services including the prepaid calling cards.

Further, we submit that the Authority should not prescribe access charges to be paid by NLD /ILD for long distance calling card services, because such an action on the part of Authority will lead to:

- Interference with the existing forbearance regime on origination charges
- Unbundling of the access network
- Adverse impact on investments by access operators who have contributed a major portion of the total investments made in the entire telecom network.

1. Policy of Forbearance on the Origination Charge:

The current IUC regime rests on the premise of "Calling Party Pays" (CPP) along with Calling Party Network Pays (CPNP) whereby all charges from the customer are solely collected by the originating operator, and then distributed between the operators. This regime embodies three basic Interconnection Usage Charges viz; Origination, Carriage and Termination charges.

Given the fact that termination being the monopoly of the terminating service provider, the Authority has fixed the termination charges that are to be paid to the operator in whose network the call is terminating. A ceiling is also mandated with respect to NLD Carriage to take care of affordability as well as competition in the carrier segment. However, origination charges are kept under forbearance primarily to enable operators to recover costs that could not have been recovered via termination as well as to provide operators adequate flexibility to roll out innovative tariffs

The relevant extracts where TRAI has explained the rationale for forbearance in Origination are reproduced below:

- 5.3.23 of the Explanatory Memorandum, IUC Regulation 2009 states as:

  '……….. Service providers are free to recover their CAPEX from the rental and the Origination charges that is under forbearance………..'

- Submission made by the Authority as referred to in Hon'ble TDSAT Judgment dated 29th September 2012 reads as under:

"………CAPEX should be recovered from other streams of revenue like rental, origination charge, administrative, VAS and other charges which are under forbearance. The OPEX must be recovered from MTC in the case of mobile termination, In other words, operational costs which are relatable to the actual usage of the network of the other service provider for MTC, FTC etc.(airtime)……..''

- Clause 1.2.5 sub clause (iv) of CP No. 17/2008 and a corresponding clause D sub clause 2.11 of CP no. 4/2011:

  "Origination Charges
  The Authority has decided that the originating network must pay from the tariffs the carriage and termination charge for the calls and retain the residual towards the expenses of originating the call. The origination charge was therefore not specified. As the other components of the calls, carriage and termination were fixed, keeping the origination under forbearance has provided flexibility in tariff and also ensured that access networks do not pass on the burden of their own tariff decisions to other networks involved in completing the call."

- Clause F sub clause 3.43 of CP no. 4/2011:

  "F- Origination Charge
  3.43 At present, origination charge is under forbearance. Forbearance in origination charges allows operators to roll out innovative tariff plans. Prescribing origination charge along with all other components of IUC would amount to fixation of retail tariffs and would take away the flexibility currently available with service providers to offer different call charges to attract diverse segments of subscribers. During pre- consultation, service providers also submitted that since market forces are working well, there is no need for regulating origination charges. Internationally, the trend is for keeping origination charges under forbearance wherever tariff is also under forbearance."

To conclude, forbearance in origination charge has been made with a view to inter-alia; to provide flexibility to originating access providers to recover not only the cost of origination but also the deficit due to fixation of termination charge which is much lower than the full cost.

2. Any attempt to now mandate fixed access origination charges would result in regulating originating charges. Such a fundamental change requires a review of the entire IUC regime and the very concept of CPP/ CPNP.

The calling card service, like any other telecom service, essentially involves origination (access), carriage and termination. Access providers are solely authorized to provide end to end access services including the STD/ ISD services. The role of NLD/ILD operators is confined only to carriage of switched bearer services over long distance/ international long distance as is apparent from the licensing terms of UASL, NLD and ILD shared below:

- **Clauses from UASL License:**

  *'2.2 (a) The SERVICES cover collection, carriage, transmission and delivery of voice and/or non-voice MESSAGES over LICENSEE's network in the designated SERVICE AREA and **<u>includes provision of all types of access services</u>**......'*

- **Clauses from NLD License:**

  *'2.2 (a) The NLD Service refers **<u>to the carriage of switched bearer telecommunications service over a long distance</u>** and NLD Service Licensee will have a right to carry inter circle traffic excluding intra -circle traffic except where such carriage is with mutual agreement with originating service provider.'*
  *'2.2 (d) .... Further, NLD Service Providers can access the subscribers directly only for provision of Leased Circuits/ Close User Groups (CUGs) and also for **<u>provision of national long distance voice service only through Calling Cards, falling within the scope of, and, in accordance with clauses 2.2(a) and 2.2(b) above</u>**. ....'*

- **Clauses from ILD License:**

  *'2.2 (a) The ILD Service **<u>is basically a network carriage service (also called Bearer) providing International connectivity to the Network operated by foreign carriers</u>**. The ILD service provider is permitted full flexibility to offer all types of bearer services from an integrated platform. .... ILD service provider shall not access the subscribers directly (except for Leased Circuits/CUG) which should be through NLD service provider or Access Provider. **<u>However, the ILD service provider may access the subscribers directly only for provision of International Long Distance voice service through Calling Cards only</u>**.........'*

It is therefore apparent that NLD/ ILD operators are allowed to sell calling cards limited to the scope of services defined in the respective licenses i.e. carriage of switched bearer telecommunication services over a long distance/ international long distance. NLD/ ILD Licensees are not allowed to sell access. Calling cards can therefore be provided in one of the two following ways:

a) By taking a tolled local access number from access service providers wherein the access service provider charges the customer directly for local access and the charges/ tariffs for carriage and termination are collected by the NLD/ ILD operator.

b) Alternatively, NLD/ ILD operators can approach access providers to provide toll free access for the calling cards sold by them. In such cases, NLD/ ILD operators become customers of access providers for local access and need to enter into commercial arrangements for the same and is not in nature of interconnection. Hence, this arrangement cannot be mandated with fixed access origination charge.

In both the scenarios, the right to provide access lies with the access provider and cannot be withdrawn/ curtailed.

3. **Existence of High Competition:**

While we endorse the Authority's objective to ensure benefits to consumers in the form of lower tariffs and innovative services, we submit that the Indian telecom sector is currently dominated by a multitude of telecom players in all segments, be it Access, National Long distance or international long distance services. Indian telecom service providers operate in a highly competitive environment, and as a result offer amongst the lowest tariffs in the world.

The tariff plans currently available offering STD are as low as local call rates. ISD rates offered by the telcos are equally competitive. For example, ISD tariffs to US/ Canada are available at 60 paisa per minute under tariff recharge whereas ISD tariffs to 30 countries are available for approx. Rs. 2.50 per minute. A list of competitive tariffs being offered by various service providers in Delhi Service Area is also attached at Annexure – I. As is evident, packs available for STD /ISD calling are affordable and there is no dearth of options available to the users. Consumers also enjoy the added advantage of migrating to other access providers in case the consumer finds better tariffs there.

In view of the submissions above, we contend that there is no need to mandate access origination charge for both NLD/ ILD calling Cards as the purpose of consumer benefit is already being served.

Q2. As the work done by the Access Provider is the same for NLD and ILD calls should the originating access charges for NLD and ILD calls be the same or different?
&
Q3. What method should be applied for prescribing originating access charge to the Access Provider? Please provide all details including data and calculation sheets, if any.
&
Q4. Whether the access charges should be same for mobile and fixed line?

Bharti Airtel's Response:

1. **Fixing of origination charges for NLD/ ILD Calling Cards will require review of existing IUC regime:**

An attempt to fix the access origination charge on the basis of cost would have serious implications and will require a comprehensive review of the present IUC regime. The present IUC regime has prescribed complete forbearance on origination charges in its

"Telecommunications Interconnection Usage Charges (Tenth Amendment) Regulations" dated 9th March 2009. The very rationale for forbearance on origination is to provide flexibility to the operators to recover their costs.

The fixation of access origination charges on NLD/ ILD calling cards will be an attempt to modify the IUC regime which will be precarious to the access operators who are already under severe pressure due to below cost termination charge. This can almost be entirely attributed to the non-inclusion of many cost items such as CAPEX, Sales and Marketing, Customer Care etc by the Authority on the pretext that forbearance in origination charge would help operators to recover these costs. The complete IUC framework would thus require a review in case origination access charges are also mandated to be fixed by the Authority..

Moreover, it is also submitted that the present termination charges of 20 paisa per minute is well below the actual cost and is presently under litigation. Operators had approached the TDSAT, which made favorable observations in this regard. Since the issue of termination charges is pending litigation therefore in the interim, the present termination charges cannot be used as the basis for determining any access origination charges for calling cards.

2. **Revenue Share for calling cards to be in proportion to the investments made by operators :**

Without prejudice to our contentions, if at all the Authority decides to fix the access origination charges, such revenue share should be in proportion to the costs and investments made by operators.

The Indian telecom sector is currently witness to a multiplicity of telecom players in all segments, be it access, National Long distance or international long distance services thereby providing a highly competitive environment. In our view, the total IUC for completing a call in a multi-operator environment to be shared for origination, transit and termination should be done on the basis of investments made by operators for the carriage of the call. Further, there is no reciprocity between an NLD/ILD operator and Access Service Provider, therefore the revenue share awarded to each must be sufficient to enable recovery of full investment costs.

It is also worthwhile to mention that in a multi operator environment, a level playing field is critical to foster healthy competition, which eventually translates to enhanced benefits for consumers. The investments made by Access, NLD and ILD operators vary considerably. As per current estimates, 95 % of the investment is made by access service providers as opposed to a meager 5% by Long Distance/ International Long Distance operators.

Originating access operators make heavy investments in networks, managing the complete life cycle of subscribers from acquisition, verification, billing and servicing as compared to other categories of licensed operators. The entire CAPEX/OPEX related to access subscriber's life cycle lies with the Access provider by deploying high cost access equipment such as BTS/BSC/MSC and other core network equipment's while NLD/ILD operators do not contribute in any significant manner towards the same and their role is solely limited to carriage. The cost of installing the IN architecture by NLD /ILD is miniscule when compared to the gigantic network costs deployed by the Access Provider.

For adequate recovery and return on investments by each of the operators, it is imperative that **the total revenue post deducting the termination charges paid for terminating a call must be shared between the originating and transiting operator on the basis of investments made by the respective operators**.

3. **Data for determining Access Origination Charges:**

Although we believe that the origination charge should be kept under forbearance, in the event that the Authority plans to go ahead with the establishment of these fixed charges, then, as submitted above, the level of investment should be the primary criteria for determining the revenue share between the Access and NLD/ ILD service providers.

In this regard, it is also submitted that the Accounting Separation Reports for all operators be available with the Authority. The same shall provide details with respect to infrastructure/ investment made by various categories of operators. The Authority may consolidate the investment data for all the Access, NLD and ILD operators separately to arrive at a revenue sharing model that takes into consideration the amount invested by each party.

It is worthwhile to mention that there has been a multifold increase in spectrum and regulatory costs for the mobile network. The same must be factored in while determining any access origination charges.

This will ensure that the Access as well as the NLD/ ILD operators get their due share commensurate with the investments made.

Q5. What are the issues that need to be addressed to ensure calling cards are also used when a subscriber is roaming?

Bharti Airtel's Response:

Presently, national roaming charges are applicable when a subscriber roams on to another circle. However, in case calling cards are allowed to be accessed on roaming, the following issues will merit consideration:

- Who will collect the access origination charges from the customer – The Roaming Provider or the Roaming Seeker?
  - In case if the roaming seeker collects the revenues, the call would have to be routed to the home circle so that the home circle is able to account for all such calls. In such a scenario, the question arises as to who will bear the cost of NLD carriage?

- In case the revenues for access origination are to be collected by the roaming provider, a subscriber can use the roaming network of other service areas without paying for any roaming charges irrespective of the duration of call made via NLD/ ILD calling cards as the same will not attract any roaming charges.

- It will also be technically difficult to stop NLD/ ILD operators from offering intra circle calls to subscribers.

Q6. What are the prevalent regulatory practices in other countries regarding access charges in case of calling cards?

Bharti Airtel's Response:

A majority of countries around the world have an Access License that covers the entire nation. Hence, internationally, the concept of NLD calling cards is for the most part non-existent.

In respect of international calling cards, most countries allow carriage of calls via public internet which is conceptually different from what is being proposed in the Indian context.

Any comparison with international practices would be incomplete at best and provide little if no insight into the approach that should be adopted in India.

Q7. Any other relevant information related to subject along with all necessary details.

Bharti Airtel's Response:

- While NLD calling cards are meant only for STD calls, it may also open local/ intra-circle call routing to NLD operators. It may not be possible for the originating operator to ascertain that intra-circle calls are not routed by the NLD operator. The Authority should therefore build in sufficient safeguards to ensure that NLD operators are not able to offer local/ intra-circle calls in the grab of offering NLD services.

- Different access codes/ cards should be used for NLD and ILD Calling cards due to the following reasons:

  - **Access Operator:** In case the same access code is used for both NLD/ ILD Calling Cards, there is no visibility to the access provider whether the call made by the subscriber is NLD or ILD. It is therefore important that the access codes for both NLD and ILD be different for proper recording and accounting purposes.

  - **Security Reasons:** In case lawful interception is to be carried out on the basis of the card purchased, it will be easier if the calling cards are accessed using different codes. It will also aid for the security agencies in identification and tracking.

- Charging of calls by the Access provider has to be on the basis of MOUs recorded on the Toll Free number and not on the basis of MOUs that are successful to the third party. The NLD/ ILD Calling card provider will have to be responsible for any misuse of the access code.

Annexure – I

Service Area: Delhi

Operator	Denomination (in Rs.)	Talk Time Range Value (Rs)	Validity (days)
Airtel	7	Local mobile -1.2p/sec, STD mobile-1.5p/sec, All Landline -2.5p/sec	30
Airtel	15	22 Local+ National Mobile Mins	same day midnight
Airtel	19	Mobile STD calls at 50P/min	28
Airtel	23	Local & STD mobile calls at 50 Paise/min	14
Airtel	25	37 Local and STD mobile mins	3
Airtel	26	200 Free Local+STD SMS	14
Airtel	29	50 STD Mobile Minutes	4
Airtel	32	57 STD Min valid for UP and Bihar	5
Airtel	33	Local and STD mobile calls at 40 p / min	14
Airtel	37	Discounted ISD tariff to 30 countries.	28
Airtel	38	STD mobile calls @ 40p/min	28
Airtel	42	450 Free Local+STD SMS	28
Airtel	44	78 UP/BIhar/Uttrakhand/Jharkhand STD minutes	7
Airtel	46	Local & STD mobile calls at 50paisa/min	28
Airtel	48	STD calls at 30P/min for 1st 100 min, thenafter at 50P/min	28
Airtel	51	15 ISD minutes to 30 Countries*	7
Airtel	53	85 minutes (Local+STD)	7
Airtel	55	100 STD Minutes	7
Airtel	57	US,canada@1p/sec till18000 secs*	25
Airtel	62	700 Free Local+STD SMS	28
Airtel	65	Local & STD mobile calls at 40 paise/min	28
Airtel	88	1000 Free Local+STD SMS	28
Airtel	96	200 STD Mins, 160 MB 2G Data	STD Mins-28 Days, Data-14 Days
Airtel	97	35 minutes ISD pack*	14
Airtel	111	200 Local +STD mins	14
Airtel	115	200 Local+STD Minutes	28
Airtel	153	60 minutes ISD minutes pack*	14
Airtel	218	2400 Locl + STD SMS Free	28
Airtel	249	500 STD Minutes	28
Airtel	399	900 Local + STD Minutes	28
Vodafone	1	All Local calls @ 1.2p/sec & all STD calls @ 1.5p/sec	30
Vodafone	2	All Local calls @ 60p/min & all STD calls @ 90p/min	30
Vodafone	5	All Local calls @ 1.2p/sec & all STD calls @ 1.5p/sec	90
Vodafone	6	All Local calls @ 60p/min & all STD calls @ 90p/min	90
Vodafone	28	All Local & STD calls @ 1.2p/sec	28
Vodafone	33	All Local Mobile calls @ 1.2p/2sec and All Landline & STD calls @ 1.5p/sec	12
Vodafone	34	All calls (Loc+ STD) @ 40p/min for 14 days	14
Vodafone	36	Australia, Bhutan, Kuwait, Pakistan, Russia, Saudi Arabia, UAE, Nigeria @ 6.9 Rs/min Bahrain, Bangladesh, Indonesia, Italy, Malaysia, Thailand @ 3.99 Rs/min Maldives @ 34.99 Rs/min Philippines, Qatar, UK, Yemen, Iraq @ 8.5 Rs/min China, New Zealand, Singapore @ 2.99 Rs/min Afghanistan, Oman @ 12.99 Rs/min USA/Canada @ 1.99Rs/min Srilanka @ 5.5 Rs/min Nepal @ 7.5 Rs/min Discounted tariff valid for 28 Days	28
Vodafone	38	All STD calls @ 40p/min	28

Vodafone	46	All Local and STD calls @ 45p/min for 28 days	28
Vodafone	47	All Local & STD calls at 1.2p/s	60
Vodafone	55	90 Local + STD mins	7
Vodafone	58	ISD Bonus Card: USA/Canada @ @ 1p/sec	25
Vodafone	68	All STD calls @ 40p/min	60
Vodafone	79	First recharge 79: Rs 30 talktime, 400 MB 2G data, 100 Local & Natl SMS, All calls @ 40p/min	28
Vodafone	81	All Local & STD calls at 1.2p/s	90
Vodafone	103	First recharge 103: Talktime Rs 103, 50MB 2G data with 7 days validity, Local & STD calls @ 40p/min for 30 days	30
Vodafone	115	200 Local + STD minutes valid for 28 days	28
Vodafone	149	1 GB 2G data,STD at 40p, 100 national SMS & 50 local V-V minutes	28
Vodafone	275	1 GB 3G data,STD at 40p, 100 national SMS & 50 local V-V minutes	28
Vodafone	299	600 STD minutes valid for 30 days	30
Vodafone	398	900 Local + STD Minutes for 28 days	28
Idea	1	Local mobile @ 1.5p/s & Local LL@ 2p/sec, STD mobile @1.5p/s & STD LL @ 2p/sec	90
Idea	3	Local/STD Calls to mobile @ 1.3p/sec & Local/STD Calls to LL @ 1.5p/sec	90
Idea	4	Local Calls to mobile @ 1.2p/sec & STD Calls to Mobile @ 1.5p/sec & All Landline Calls @ 2p/sec	90
Idea	11	Nepal/ Pakistan/ Bangladesh @ Rs.6.99/min; US/Canada @ Rs.1.99/min, Gulf (excluding Oman & Qatar) @ Rs8.99/min, Sri Lanka @ Rs.6.99/min, Afghanistan @ Rs 13.99/min, Australia (Mob) @ Rs.6.99/min, UK(Fixed), Australia (Fixed) /Malaysia / Singapore / Thailand / Hong Kong /China @ Rs 2.5/min, Nigeria @ Rs 8.99/min	10
Idea	15	25 STD min for 2 days	2
Idea	22	35 Local STD Mins	2
Idea	23	Nepal/ Pakistan/ Bangladesh @ Rs.6.99/min; US/Canada @ Rs.1.99/min, Gulf (excluding Oman & Qatar) @ Rs8.99/min, Sri Lanka @ Rs.6.99/min, Afghanistan @ Rs 13.99/min, Australia (Mob) @ Rs.6.99/min, UK(Fixed), Australia (Fixed) /Malaysia / Singapore / Thailand / Hong Kong /China @ Rs 2.5/min, Nigeria @ Rs 8.99/min	30
Idea	24	43 STD min for 4 days	4
Idea	32	All STD calls @ 40p/min	28
Idea	39	All Local/ STD calls @ 40p/min	20
Idea	43	STD Calls @30p/min till 100mins, post that STD calls @50p/min	28
Idea	45	80 STD min for 7 days	7
Idea	48	Local Idea Calls @30p/min , Local Others & STD Calls @ 40p/min	28
Idea	55	90 Local/ STD Mins	7
Idea	57	US/ Canada @ 1.5p/sec	30
Idea	66	75 Loc/STD Mins for 30 days + UP - Bihar STD @40p/min for 30 days + Local Mobile 1.5p/s & Local LL 2p/s, STD Mobile 1.5p/s & STD LL 2p/s for 90 days^	90
Idea	94	All STD Calls 40p/min	90
Idea	95	170 STD min for 14 days	14
Idea	109	190 Local/ STD Mins	28
Idea	139	All Local & STD Calls 40p/min	90
Idea	149	260 Local STD Mins	28
Idea	224	500 STD mins free	30
Idea	Talktimededu ctionofRs.25/	1) 40 Local/STD Minutes for 3 days validity. 2) 250 Local/ STD SMS for 30 days validity. 3) 45 Local Mobile Minutes for 3 days validity	As per pack selected

RCOM	28	UAE, Qatar-Fixed, Yemen Rep, Philippines - 16p/sec, Saudi Arabia-Mo, Japan - 14p/sec, USA (ex Puerto Rico, Alaska & Hawaii), Canada, Europe Fixed (UK, Germany) - 2p/sec, Sri Lanka, Nepal, Bhutan - 12p/sec, Bangladesh - 5p/sec, China, Singapore, Thailand, Hong Kong - 3p/sec, Qatar-Mo - 20p/sec, UK-Mo - 25p/sec, Oman-Mo - 30p/sec, Australia, Belgium, Indonesia, Korea (South), Spain, Saudi Arabia-Fixed, Bahrain, New Zealand, Kuwait, Germany-Mo, Malaysia, Iran, Oman-Fixed, France, Portugal, Vietnam - 10p/sec	28
RCOM	32	ALL local + STD Calls - 60 minutes free for 7 days;	7
RCOM	64	115 local + STD minutes for 7 days	7
RCOM	109	220 local + STD minutes for 14 days	14
RCOM	15	All local & STD calls @ 50 paise/min	25
RCOM	23	All STD @ Re 1/3 minutes for 21 days	21
RCOM	24	STD 25 paise/min for 100 minutes after 100 minutes STD @ 50 paise/min - 28 days	28
RCOM	37	STD 25 paise/min for 150 minutes after 150 minutes STD @ 40 paise/min - 28 days	28
RCOM	79	UL R - R local (Night 11 - 6) for 14 day + 500 R - R STD minutes for 14 days	14
RCOM	599	Free Unlimited local R to R + 4000 minutes to any Reliance STD Number valid 28 days, Post 4000 minutes Rel - Rel STD calls @ 20 paise/min	28
RCOM	799	Unlimited Local R to R + 10000 R to R STD + Daily 30 minutes to other (Local/STD) - for 28 days, Post 10000 minutes Rel - Rel STD calls @ 20 paise/min	28
Aircel	6	Local A-A @ 1.2p/sec, Local A-O @ 1.2p/sec, STD @ 1.2p/sec.	90
Aircel	18	ISD Calls US (Except Alaska, Guam, Hawaii) @ Re1/Min, Canada (Except the high cost area) @ Re1/Min, U.K (Fixed) @ Re1/Min, UAE @ Rs8/Min, Saudi Arabia(Mobile) @ Rs6.99/Min, Saudi Arabia (Fixed) @ Rs6.99/Min, Pakistan @ Rs6.99/Min, Singapore @ Rs1.20/Min, Bangladesh @ Rs2.20/Min, Malaysia @ Rs2.20/Min, Sri Lanka @ Rs6.99/Min, Nepal @ Rs6.99/Min, Kuwait @ Rs6.99/Min	28
Aircel	22	STD Calls @ 25p/min for first 100 mins post that 50p/min	28
Aircel	28	STD: STD Calls @ 40p/Min for first 500 STD Mins, thereafter 50p/Min	28
Aircel	36	First 100 Mins: STD On Net Calls @ 10p/min; STD Off Net Calls @ 40p/min; Thereafter: All STD Calls @ 40p/mins	28
Aircel	38	Local Calls @ 40paisa/Min; STD Calls @ 40paisa/Min; ISD Calls: US (Except Alaska, Guam, Hawaii) @ Re1/Min, Canada (Except the high cost area) @ Re1/Min, U.K (Fixed) @ Re1/Min	28
Aircel	46	Local Calls: Aircel to Aircel Calls @ 10paisa/Min, Aircel to Other Calls @ 50paisa/Min; STD Calls @ 50paisa/Min; GPRS Usage: 1p/10kb	84
Aircel	54	calls at 40p/Min to UP & Bihar for 90 days*, FTT on any recharge above Rs 30/- on every Talk time recharge.	84
Aircel	62	Local A2A 1p/3sec, Local A2O 2p/3sec, STD 1p/sec, ISD As per existing base tariff, SMS Rates: Local Rs.1, STD Rs.1.5, ISD Rs.5, Other Benefits: FTT on any talk time recharge above Rs 50/-. 75 local/national mins.	90
Aircel	66	ISD: Malaysia & Singapore : Rs3/Min, Gulf - UAE@Rs8/Min, Saudi Arabia@Rs6.99/Min , Bahrain @ Rs6.25/Min & Qatar @ Rs6.25/Min, Oman : Rs8.20/Min, Sri Lanka: Rs6.99/Min, China and South Korea: Rs4/Min, US/CAN (Except Alaska, Hawai and Guam): Rs1.50/Min, US(Others): Rs5/Min, UK (Fixed): Rs3.75/Min, Nepal : Rs7/Min	56
Aircel	72	All Local & STD Calls @ 40p/min	56
Aircel	237	100 Local/National min, Local A2A@10p/min, Local A2O@40/min, STD@60p/min, 100 Local/National SMS	90
Aircel	1398	Unlimited STD A-A + Unlimited Local A-A; Other STD & Local Calls @ 1p/sec	28