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Ref. 445/324/5914

Date 9/12/14

9, December, 2014

To The Chairman, TRAI, Mahanagar Doorsanchar Bhawan Jawaharlal Nehru Marg (Old Minto Road) New Delhi: 110 002, Government of India, Respected Sir,

Subject: TRAI's Inter Connection Charges Issues

Today, many in India believe that Telecom and Internet Access can make a major difference to the nation. There is a strong desire to get better access and people are in general not satisfied with the level of service. Department of Telecommunications (DoT), so far the monopoly operator in the country, is trying to expand its network rapidly, but this is still considered inadequate. The 17.5 million telephones for its 970 million people, account for a teledensity of barely 1.5, whereas the world average is about 14 and even many of the developing countries have a teledensity of more than 4. About 25% of the telephones are in four metros. Even though 74% of the population lives in rural areas, the number of village telephones is less than 1% of the total. The number of Internet subscribers amount to barely 1 per 10,000 populations and mostly confined to large cities. If a hundred million or more telephones and twenty five million or more Internet connections are to be installed in India, and the service is to be economically viable, the investment per line has to be less than half of what it has been till recently. Recent technological advances in wireless and fibre-based access technologies, open interface standards, high-speed digital transmission on the copper loop, and Internet remote access switches have made this cost reduction feasible. It is possible to install a complete network in India today at per-line cost of Rs.18,000. This would require use of Technologies developed in India over the past few years and will require a continuous striving to come up with new products to add features and further reduce costs. Yet this network would enable one to have a moderate to high-bitrate Internet access at low tariff.

Under the above context, TRAI in its policies committed to reduce the Inter Connection charges which will highly benefit the end users. Since 1999, TRAI has passed various amendments in the reduction of inter connection charges. In 2011, Supreme Court of India also recommended to reduce the rate after consulting with the major stakeholders of the telecom sector. In 2013, based its new policies, telecom sectors like Vodafone, Idea cellular, etc increased the interconnection charges by Rs.0.10/. This is again a burden for the end users. We as a member of the civil society which represents the larger interest of the society earnestly requesting the Telecom Regulatory Authority of India to consider its plan of 2011 where it said that it will bring down the termination charges to zero paise. In 2011, TRAI suggested bringing down the termination charges to zero by moving to a new regime known as Bill & Keep (B&K) wherein an operator 'bills' its customer(s) where call originates and 'keeps' the amount instead of transferring the same to the operator where call is terminated. While doing so, TRAI also admitted prevalence of asymmetries in the domestic calling traffic flows among new and incumbent operators and concluded on the provision of a two-year period for the market to absorb such asymmetries. Since its suggestion of 2011, three years have been passed and TRAI has not reached in any concrete decision. As a result, the end users are suffering and mobile providers are making profit. It is our humble request to TRAI to implement its 2011 plan of reducing the inter termination charges to ZERO.

Thanking You.

Warm best Regards,

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Secretary,
Grama Vikas Sangha,