



# जन सहयोग सेवा संस्थान

## ग्राम-रकौरा, पोस्ट - बाकरगंज, जिला - फैजाबाद (उ०प्र०)

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ई-मेल : awanishmishra8@gmail.com, mohanbbf@rediffmail.com

पत्रांक :

दिनांक : .....

To,

Date: 18/12/2014

**Dr. Rahul Khullar,**  
**Chairman,**  
**Telecom Regulatory Authority of India,**  
**Mahanagar Doorsanchar Bhawan,**  
**Jawaharlal Nehru Marg,**  
**New Delhi - 110002**

**Subject: Comments on TRAI's Consultation Paper on 'Interconnection Usage Charges' dated 19.11.2014.**

Dear Sir,

The Prime Minister's initiative of 'Digital India' envisages promoting e-governance, transform India into a connected knowledge economy and making India a leader in digitally delivering health, education and banking services. This vision of digital India is very timely and required to be supported by every department and every citizen of this country. Further, the digital India vision has targeted Universal Access to mobile connectivity i.e. coverage for remaining 42,300 uncovered villages by 2018. The key behind success to this program is the affordable tariffs of mobile services.

2. National Telecom Policy -2012 has the vision to provide secure, reliable, affordable and high quality converged telecommunication services anytime, anywhere for an accelerated inclusive socio-economic development. It envisages leveraging telecom infrastructure to enable all citizens and businesses, both in rural and urban areas, to participate in the Internet and web economy thereby ensuring equitable and inclusive development across the nation. Some of the important objectives of NTP-2012 are as follows:

- Increase rural tele-density from the current level of around 39 to 70 by the year 2017 and 100 by the year 2020.
- Reposition the mobile phone from a mere communication device to an instrument of empowerment that combines communication with proof of identity, fully secure financial and other transaction capability, multi-lingual services and a whole range of other capabilities that ride on them and transcend the literacy barrier.

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 अ. अ. मिश्रा  
 अध्यक्ष







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8. Bill and keep is the most efficient competitive method of setting price. For determination of appropriate regulated termination charges, regulator is depended on the information from service providers, selecting a suitable method etc. Not all information necessary for setting the efficient price is available with the regulator, who is dependent on operators that do not have incentives to provide the correct information. Apart from this, without the competitive pressure on prices, operators themselves may not have all information. The full information will only arise from the competitive process in which prices are set, demand adjusts and prices are set again as a continuous process.

9. In view of the above, it is submitted that instead of adopting any other method for determination of termination charges, the Authority should implement Bill and Keep method. With the adoption of Bill and Keep regime, the objectives of NTP'2012 and 'Digital India' envisaged by Hon'ble Prime Minister could be easily achieved. The bill and keep regime would be in larger interest of consumers of telecom services. Further, the implementation of bill and keep regime will be in line with TRAI's own recommendations in its report submitted to Hon'ble Supreme Court.

Sincerely,  
Avnish Mishra

जन सहयोग सेवा संस्थान फैजाबाद (उ०प्र०)  
*(Signature)*  
प्रधान

President,  
Jan Sahyog Sewa Sansthan