Regulation Cell, Corp. Off.

5th Floor, Bharat Sanchar Bhawan, Harish Chandra Mathur Lane, Janpath

New Delhi - 110001

Tel.: 011 - 23739295 Fax: 23734081

e-mail: agmregln@gmail.com.

To.

Advisor (Broadband & Policy Analysis),

Telecom Regulatory Authority of India, Mahanagar Doorsanchar Bhawan, Jawahar Lal Nehru Marg, (Old Minto Road), New Delhi-110002

No. Regln/1-4/2011/ 9507 (Kind Attn: Shri. S.K. Singhal)

Dated: 09-12-2019

भारत संचार निगम लिमिटेड

BHARAT SANCHAR NIGAM LIMITED

Sub: TRAI issues Consultation Paper on "Review of Interconnection Usage Charges"

Kindly refer to the TRAI Consultation Paper on "Review of Interconnection Usage Charges" dated 08-11-2019. In this context, the comments of BSNL are as follows:

- Q1. Keeping in view the changes happening in the international telephony market structure, is there a need for change in the regulatory regime for International Termination Charge (ITC) i.e. change the existing regulatory regime from fixing uniform rate of ITC to an alternate approach? Kindly justify your comments with supporting arguments.
- Q2. If your response to the Q1 is affirmative, then what should be the alternate approach? Kindly elucidate the alternate approach and benefits of the same vis-à-vis the present approach.
- Reply for Q1 & Q2: The prevalent termination charges for International incoming calls is Rs 0.30 per minute. However, termination charges in several countries are eight to ten times higher than International Termination Charges in India. International Termination Charges were reduced from Rs 0.53 to Rs 0.30 in February 2018 and Dollar exchange rate variation from 2015 to 2019 is Rs 62 to 71 as per details as available on RBI website. The Indian ILDO's pay the International Settlement Charges in USD to Foreign Carriers for settlement of traffic account.

BSNL is of the opinion that since the termination charges in some other countries are eight to ten times higher than International Termination Charges in India, Incoming termination rate which is presently Rs 0.30 may be fixed in terms of US Cents as 1 Cents/ Min which will give relief regarding FOREX variation in deducing the Incoming IUC. However, settlements among Indian ILDO's will be Indian Rupee only. Additionally International Termination charge in the country may be kept uniform for all terminating networks.

Q3. If your response to the Q1 is negative, then in the changing international telephony market structure, what other regulatory measures are required to be taken by the regulator for protecting the interests of Indian consumers and service providers? Kindly justify your comments with supporting arguments.

Reply: Not Applicable in view of Reply of Q1.

Q4. Your comments on any other issue related with the international termination charges may also be given.

Reply: No comments

(Ved Prakash Verma) AGM (Regin-II)