

Response of DEN Networks Limited to the Draft the Telecommunication (Broadcasting and Cable) Services Register of Interconnection Agreements Regulations,2019

Dear Sir/Madam,

First of all we thank you for giving the opportunity to the stakeholders to share their views on the subject matter under consultation.

Please find below DEN views on the Draft Regulation.

In Clause 3 (2) :- The average active subscriber base number should not be mentioned as the Regulation should be applicable to all irrespective of their subscriber base. By giving this relaxation, the Authority itself would be creating two classes of DPO's , which does not entail good for the future of this sector. This would further give rise to different classes of DPOs asking for some or the other relaxation from complying with one or the other requirements of the New Tariff Regime. The filing should be Six monthly.

Clause 3 (3):- The filing should be Six monthly.

Clause 4(2):- Instead of All individual agreements it should be all interconnect agreements. As the word all individual agreement is very wide and vague and which may include every agreement apart from the interconnect agreement. Since this is register of Interconnect Agreement therefore only Interconnection agreements needs to be reported.