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GOVT. NO. TSR. 1/2005/PT/474 OF 2016 H.Q. RAJPUR P.O OLD BHAITBARI DIST. WEST GARO HILLS, MEGHALAYA PIN-794104

CONTRACT NO. 9954090703-9678148613

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14/10/2019

Memo No. Sun Light Mus HR 19/42

Dated, the Rajpur 16th 017/2019

To Shri Ravi Shankar Prasad Hon'ble Minister, Ministry of Communications & IT Department of Telecommunications, 20, Sanchar Bhawan, Ashoka Road New Delhi-110001

Sub: TRAI's consultations on "Review of Interconnection Usage Charge Regulations, 2017.

Dear Shri Ravi Shankar Prasad Jee,

This letter is regarding to current decision of the Telecom Regulatory Authority to call for Consultation Process on the subject titled "Review of Interconnection Usage Charge Regulations, 2017.

As you are aware much to the detriment of consumer interest, Interconnection Usage Charges (IUC) acts as a barrier to reduction in Tariffs. Under IUC regime, it is clear that on net calls (that is calls which originate and terminate in the same operator network) are priced less than off net calls (that is calls originating in one operator network and terminating in another operator network). This is the effect of IUC and is certain to hamper competition which is anticonsumer.

It is also worth mentioning the fact that TRAI after doing due consultations, had decided to do away with IUC platform by 1st January, 2020 and thus, in 2017, TRAI reduced IUC charges to 6 paise / minute from 14 paise and announced that IUC charges will be zero starting January 1, 2020, based on the view that costs incurred by operators will drop. TRAI also agreed in 2017 that the move to cut IUC was justified at a time when communication apps are becoming more popular, leading to a reduction in voice traffic.

We are surprised to understand that TRAI has come out with another round of consultation process on the subject titled "Issues related to Interconnection Regulation, 2017 on 19th September, 2019 and perhaps intend to continue with IUC regime which we feel is uncalled for and anti-consumer decision. We are also confident that the continuance of IUC regime will affect the vision of Hon'ble Prime Minister on "DIGITAL INDIA".

There are sound economic reasons which necessitate the need to move towards a 'Bill and Keep' interconnect regime as it is compatible with new technological innovations and emerging technologies like IP networks and will keep control the increase in prices and will ensure further lowering of telecom tariff in India due to greater retail pricing flexibility with Operators under BAK and increased competition.

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The Current IUC regime is not compatible with the technological evolutions / IP based networks —Bill & Keep (BAK) is one of the viable option for future proofing. The advent of new technologies & diminishing boundaries between networks question the need for interconnect charges that are currently levied.

Therefore, in the interest of the telecom industry, we perceive that for the interests of the consumer, IUC regime should be replaced with Bill & Keep Regime.

Look forward to your interventions for larger interests of the Consumers.

With regards

nd Hashenun Rahman

Secretary Secretary Sun Light Club,H.Q.Rajpur P.O.Bhaktbari,W/Garo Hills.

Cc to

- 1. Dr P. K Mishra, IAS, Principal Secretary to the Prime Minister, Prime Ministers Office, South Block, New Delhi 110001
- 2. The Chairman, Telecom Regulatory Authority of India, Mahanagar Doorsanchar Bhawan next to Zakir Hussain College, Jawaharlal Nehru Marg, New Delhi, Delhi 110002