

VOICE Comments on 'Consultation Paper on Review of Interconnection Usage Charges'

1 message

H Upadhyay <hupadhyay@consumer-voice.org>

Thu, Dec 5, 2019 at 2:30 PM

To: sksinghal@trai.gov.in, interconnection.trai@gmail.com

Cc: COO <coo@consumer-voice.org>, Prof_Khanna <sriramkhanna@yahoo.co.in>

To,

Shri Sunil Kumar Singhal, Advisor (BB & PA),

TELECOM REGULATORY AUTHORITY OF INDIA

MAHANAGAR DOORSANCHAR BHAWAN,

JAWAHAR LAL NEHRU MARG, NEW DELHI-110 002

Email: sksinghal@trai.gov.in and interconnection.trai@gmail.com .

SUBJECT: VOICE Comments on 'Consultation Paper on Review of Interconnection Usage Charges'

Voluntary Organisation in Interest of Consumer Education (VOICE) is a consumer protection group set up by teachers and students of Delhi University in 1983.

We at VOICE as part of our advocacy initiative in Telecommunications continuously raise different issues with Policy makers impacting consumers based on the knowledge through Consumer feedbacks.

As a registered CAG we are in forefront of providing inputs to the Government, Regulatory authorities, consumers and business community at large related to consumer concerns and interests.

In continuation of this effort on behalf of consumers we at VOICE have following COMMENTS –

At the outset we believe that incumbent operators should not be provided with an undue advantage over a new entrant thereby increasing entry cost to a new operator and resultant reduced competition.

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.

Yes, it needs to be changed. Telephony in the traditional sense has been made extinct by the technological advances more so with the upcoming migration to 5G where it is nothing but an exchange of data. Operators can not be allowed to continue to be rent seekers and advantage of latest tech at the same time.

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.

No alternate is needed – IUC should be totally eliminated as proposed by TRAI earlier. Elimination of IUC will improve competitive environment in the Telecom sector, relatively reduce cost of entry for new entrants and will also provide a cost reduction to consumers. This consumer advantage may actually lead to more calling by consumers – increased consumer usage.

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.

Not applicable.

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

Lately it has been demonstrated by some of the TSPs that International Termination Charges can be optimised for Indian consumers. Following are few suggestions-

- 1. TRAI and DOT both should try and facilitate TSPs to gain more beneficial terms with Telecom Operators of other countries.**

2. TRAI can also try for a collective bargaining on behalf of Indian TSPs with say a minimum revenue guarantee, OR

3. Negotiate for bulk minutes of usage with Telecom operators of various countries.

4. Offer preferential terms to one Telecom operator each from different countries.

In conclusion we at VOICE are of the opinion that IUC should be totally eliminated.

--

--

Hemant Upadhyay
Advisor-Projects, IT & Telecom

Consumer VOICE
E-34, East of Kailash
New Delhi-110065
Ph. 011-47331010 Fax 011 24379081
www.consumer-voice.org

Please visit our new website for latest blogs/product reviews and much more:

