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Date: 19th November, 2010

To
The Secretary
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi 110 002

Kind Attn.: Principal Advisor (I&FN)

Subject – Setting floor price for settlement in India of International Long Distance minutes.

Dear Sir,

This is further to the Authority request to all stake holders to furnish their comments on the subject matter.

Kindly find enclosed herewith the Uninor response on the Setting floor price for settlement in India of International Long distance minutes.

Submitted for your kind consideration

Thanking you,

Yours sincerely,
For **M/s Unitech Wireless (Tamil Nadu) Private Limited**

(Vikram Chona)
Head – Regulatory Operations

Enclosed – as above

*NOTE: The term "**Unitech Wireless**" as used in this letter means and includes the 8 Unitech Telecom companies which have been granted UAS license by the DoT, namely Unitech Wireless (South) Private Limited, Unitech Wireless (North) Private Limited, Unitech Wireless (East) Private Limited, Unitech Wireless (West) Private Limited, Unitech Wireless (Tamil Nadu) Private Limited, Unitech Wireless (Delhi) Private Limited, Unitech Wireless (Mumbai) Private Limited and Unitech Wireless (Kolkata) Private Limited.*

Uninor response - Setting floor price for settlement in India of International Long distance minutes

As per TRAI regulations, the settlement of ILD minutes is under forbearance, while incoming ILD voice termination rates are prescribed by TRAI and are agonistic to the country of origin of a particular call. ILD operators in India are entering into mutual commercial agreements for settlement of Long Distance minutes traffic whether inbound or outbound. The mutually agreed settlement takes into consideration different factors, including:

- The carriage an termination rates in respective countries
- Traffic volumes
- Traffic routing between interconnecting ILD gateways

Since, these factors are dynamic accordingly these agreements are reviewed periodically by ILDOs.

India Telecom market is already characterized by a segmented termination rate approach; 20 paisa for traffic originated in India and 40 paisa for traffic originated abroad. Any further segmentation will only lead to cumbersome task to administrate mutual termination rates. Moreover, different mobile termination rates depending on origin of the call, will create arbitrage opportunities leading to encouragement to grey market activity.

Therefore, selective regulation by way of setting floor price for settlement in India of International Long Distance minutes as proposed in the 25th August letter will not help the cause. In addition if TRAI decides to intervene now for one instance it will open the door for active interventions repeatedly; which at present is left to ILDOs under forbearance.

Hence UNINOR does not support this approach

17/11/10