

TRAI/Aircel/Corr/2014/202

October 14, 2014

Advisor (F&EA) - I

Telecom Regulatory Authority of India
3rd Floor, Mahanagar Doorsanchar Bhavan
Jawaharlal Nehru Marg (Old Minto Road)
New Delhi – 110 002

Subject: Response to Draft Telecommunication Tariff (Fifty Ninth Amendment) Order, 2014

Dear Sir,

This is with reference to subjected draft amendment.

At the outset, we welcome the Authority's initiative on exempting the ISP's from the tariff reporting to TRAI. In this regard, we would like to highlight that the Internet Service Providers (ISP) are a niche segment of telecom licensees, who are generally providing services to entrepreneurs and enterprise customers.

The ISPs do not have either very high numbers of broadband connections nor are their revenues very high. Also, generally their organizational set-up is also not of the scale, which would be sufficient to cater to Regulatory reporting requirements. Also, the tariffs are mostly customized to customer needs and are part of negotiations.

Further, we would like to highlight that Authority has already taken note of these concerns and have exempted the ISPs from many Regulatory requirements, which otherwise apply to access licensees.

Sir, you would appreciate that ISPs are an important link in serving the smaller communities and connecting the unconnected as such, they should be encouraged by removing the reporting related regulatory requirements.

Keeping all above in view, we request that ISPs having subscriber/accounts less than 10000 as on last day of preceding financial year, should be exempted from all tariff related reporting requirements.

Aside, we also request the Authority to kindly review the tariff reporting requirements for Access licensees as well. There is a logistical issue in filing the hard copies of tariffs and sometimes delay has been observed. It is requested that electronic filing (either over email or some web-based portal be developed) be allowed for submissions of tariffs during any point of the day.

Aircel Limited
Corporate Identity Number:
U32201TN1994PLC029608.
E-mail: corporate.ai@aircel.co.in,
website: www.aircel.com

सलाहकार (एफ. एण्ड ई.ए.)
डायरी सं. 1004
दिनांक 15/10

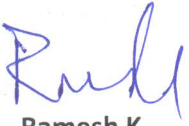
भारतीय दूरसंचार विनियामक प्राधिकरण
महानगर दूरसंचार भवन, नई दिल्ली-110002
14 OCT 2014
डायरी सं. 20216

Aircel Limited :

We hope our above submission would merit Authority's kind consideration.

Thanking you,

Yours faithfully
For **Dishnet Wireless Limited**



Ramesh K
Sr. General Manager- Corporate Regulatory