



SSTL/Reg/TRAI/ 1410/424

October 14, 2014

Shri Manish Sinha
Advisor, F & EA - I
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi – 110 002

Subject: Response to TRAI on 'Draft Telecommunication Tariff (Fifty Ninth Amendment) Order, 2014' dated 24th September 2014

Dear Sir,

With reference to above please find enclosed our comments to the TRAI's 'Draft Telecommunication Tariff (Fifty Ninth Amendment) Order, 2014' dated 24th September 2014.

We hope that the Authority will consider our views and comments enclosed while finalizing the Telecommunication Tariff (Fifty Ninth Amendment) Order, 2014.

Thanking you,

With Regards,

For Sistema Shyam TeleServices Limited


Sunil Gupta
Associate Director

Enclosed: As above

Sistema Shyam TeleServices Limited

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a step ahead

Comments on Draft Telecommunication Tariff (Fifty Ninth Amendment) Order, 2014

1. Sistema Shyam Teleservices Ltd (SSTL) welcomes opportunity extended by the TRAI to comment on the draft Telecom Tariff (Fifty Ninth Amendment) Order to exempt SP having less than 10,000 subscribers from the tariff reporting requirement.
2. The Indian telecom sector has significantly changed due to multiplicity of operators in each service area and significant growth of data services. The market is highly competitive which ensures that the consumer interest with regard to tariffs is protected **In view of this we request that all service providers should be exempted from tariff reporting** and not just those ISPs with minimum 10,000 subscriber base.
3. There cannot an exemption category for tariff reporting as it is linked to consumer interest. The TRAI has mandated tariff reporting for the following reasons:
 - ✓ To ensure transparency and non-discrimination;
 - ✓ To ensure tariffs are non-predatory
 - ✓ To ensure these are compliant to regulations
 - ✓ To ensure these have been put on service providers's website
 - ✓ To ensure consumers are protected against any price hike for a minimum period of 6 months.
4. *The Authority considers that tariff reporting is essential to protect the consumer interest and specified financial disincentive for any delay in reporting of tariffs. Since tariffs reporting are linked to consumer ineterest, we see no reason why certain ISPs should be exempted from the tariff reporting requirement.*
5. *SSTL suggests that there should be a uniform requirement of tariff reporting across all TSPs irrespective of their market share. If consumer interest is linked to tariff reporting, there can be no exemption for certain operators.*
6. **In view of the above we do not support Telecommunication Tariff (Fifty Ninth Amendment) Order, 2014 and suggest that there should be uniform tariff reporting requirement across all TSPs.**