



13<sup>th</sup> March 2015

**The Secretary,**  
**Telecom Regulatory Authority of India,**  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg, Old Minto Road,  
New Delhi – 110 002

**Kind Attention: Advisor (F&EA)**

**Subject: The Draft Telecommunication Tariff (Sixtieth Amendment) Order, 2015.**

Dear Sir,

At the outset we wholeheartedly welcome the Authority's initiative to streamline the process of National Roaming Tariffs. While we are confident that the above mentioned amendment in TTO will go a long way in bringing further transparency in tariff offerings, we at the same time are constrained to feel that certain provisions of the proposed TTO require to be re-looked at.

There are a few areas of concerns enumerated below, which we would request the Authority to kindly take into consideration.

- The proposed tariff will result in higher payouts to bigger operators, impacting the sustainability and roaming business plans of small operators and also this will impact the business of operators who do not have pan India network and full spectrum in few circles like TTL (no GSM spectrum has been allocated by DoT till date in 39 critical districts in 9 Service Areas and also in Delhi Service Area despite having made the full payment in 2008 itself).
- TRAI has reduced the rates of carriage Charges. TTL is of the view that this reduction in carriage charges is a good mechanism for rationalization of tariffs for National Roaming. Any further reduction in the roaming charges as proposed by TRAI will lead to distortion of market in favour of big operators.
- Current cost of incoming call on roaming subscriber should continue as the existing tariffs are cost based.
- Outgoing SMS while on roaming with other operators should be determined by the Authority keeping in mind the current charging pattern, National Roaming Charges (i.e., on-net and off-net SMS charges) shall be as filed by the Operators with TRAI.
- Although we agree that National Roaming tariff Ceiling should be determined with the cost based approach, however all internal costs against each transaction should be considered, in order to arrive at the final ceiling, to ensure that the subscribers of smaller operators also enjoy the national roaming scenarios.

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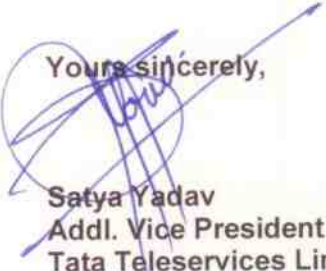


In view of the above, we request the Authority to consider retaining the existing roaming tariffs.

Hope our request will be viewed favorably

Thanking you and assuring you of our best attention always.

Yours sincerely,

  
**Satya Yadav**  
**Addl. Vice President – Corporate Regulatory Affairs**  
**Tata Teleservices Limited**  
**And**  
**Authorized Signatory**  
**For Tata Teleservices (Maharashtra) Limited**