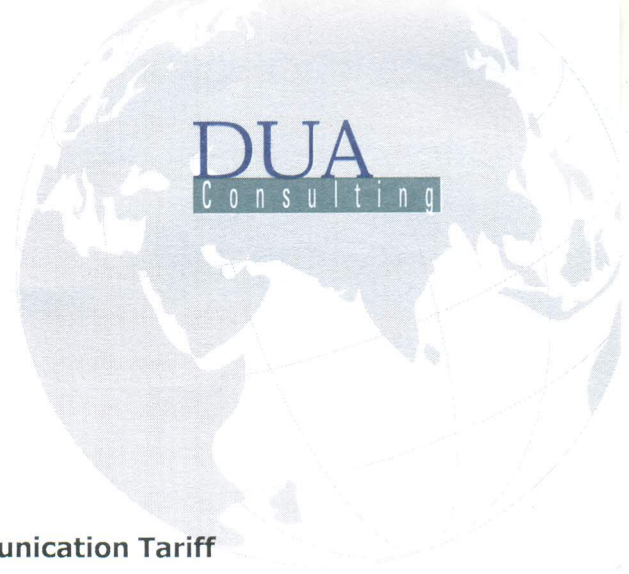


13 March 2015

Mr. Manish Sinha
Advisor (F&EA)-I
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhavan
Jawahar Lal Nehru Marg
New Delhi 110 002



**Re: Comments on the Draft Telecommunication Tariff
(Sixtieth Amendment) Order, 2015**

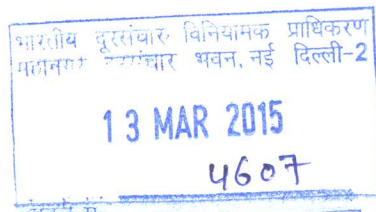
Dear Mr. Sinha

We would like to submit the following comments on the Draft Telecommunication Tariff (Sixtieth Amendment) Order, 2015 for your review and consideration:

- 1) Differentiating Urban and Rural Circles- We believe that there should be different tariff ceilings for urban and rural circles. The biggest flaw today in the roaming charge is that, it is flat all across the board. The Authority should look at providing differential roaming charges both in rural areas and metros. This is because the cost of obtaining telecom license in a metro is much more than obtaining the telecom license in a rural area. In addition, they could also consider NLDC distance based, say free up to 500km, and suitable slabs beyond.
- 2) Easing Industry Burden- The Authority must keep some room for the industry to make some money. Gross revenues earned by the incumbents from the national roaming services (10%-12%) whether inclusive or exclusive of the carriage charges, must be compensated. In view of this, any reduction in ceilings must not deprive the industry of earning revenues and the Government shouldn't see the telecom sector as a cash cow.

We do hope that the regulator's recommendations take into consideration these aspects.

With best personal regards
Yours sincerely
B.K. Syngal
13 March 2015



B.K. Syngal
Senior Principal

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