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भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

To,

Advisor (Broadband & Policy Analysis),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
(Old Minto Road), New Delhi-110002

(Kind Attn: Shri. Sunil Kumar Singhal)

No. Regln/1-4/2011/ 9277.

Dated: 18-10-2019

Sub: BSNL comments on TRAI's Consultation Paper on Review of Interconnection Usage Charges

Kindly refer to TRAI's Consultation Paper no.13/2019 dated 18-09-2019 on "Review of Interconnection Usage Charges".

In this context, BSNL's comment on the aforementioned consultation paper is as below:

TRAI's Q1: *Is there a need to revise the applicable date for Bill and Keep (BAK) regime i.e. zero mobile termination charge from 01.01.2020? If yes, then what parameters should be adopted to decide the alternate date? Give your suggestions with justification.*

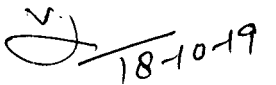
BSNL Comment: Yes, the applicable date for Bill and Keep (BAK) regime i.e. zero mobile termination charge from 01.01.2020 should not only be revised but kept in abeyance for the time being. Further the Bill and Keep arrangement itself be reviewed to make it on work done principle in view of imbalance in originating and terminating traffic between the operators.

The domestic Mobile Termination charges (MTC), as computed by TRAI from time to time, should continue to be applicable, eternally. The parameter for revising MTC should be based on the actual termination cost incurring to the respective company to enable the company recover the cost of termination. The MTC should be revised at regular interval of one year or more, eternally.

TRAI's Q2: *Any other issue related with the domestic wireless termination charges.*

BSNL Comment: TRAI should make the MTC - domestic wireless termination charges, differential, i.e. in accordance to respective actual termination costs to the company. Since, the annual report of every company is submitted to TRAI, it should not be a matter of dispute.

This is for kind consideration please.


(Ved Prakash Verma)
AGM (Regln-II)