



नूतन संकल्प फाउन्डेशन

Ref. No. NSP/06/2019

Date.....

Date: 30/09/2019

Place: New Delhi

To

The Chairman,
Telecom Regulatory Authority of India, Government of India
MahanagarDoorsancharBhawan Next To ZakirHussain College,
Jawaharlal Nehru Marg,
New Delhi - 110002

Sub: Suggestions on Review of Interconnection Usage Charge Regime Reg-1119

Respected Sir,

We would like to bring to your kind notice that recently the Telecom Regulatory Authority of India (TRAI) has issued a discussion paper on deferring the implementation of the zero-interconnect usage charges (IUC) regime that was slated to kick in from January 2020 on the ground that consumers are yet to migrate completely to data calls and that the imbalance in voice traffic between operators still exists.

As is learnt, at present, interconnect charge is paid by the call-originating telecom operator to the destination operator. But under the proposed BAK system, which is planned to take effect from January 2020, the call-originating telco, which also bills the user, would keep the money, thus making it a zero-IUC regime.

TRAI had sought stakeholder views on the need to "revise the applicable January 2020 date for implementing the BAK (bill and keep) or zero-termination charge regime.

As we understand the implementation of the Bill & Keep regime by the Telecom Regulatory Authority of India (TRAI) will help more in making services more affordable for Indian customers than again going back to Interconnection User Charge regime.

The TRAI earlier had slashed mobile termination charges to 6 paise from 14 paise effective from October 1, 2017. The regulator was supposed to phase out IUC regime from January 1, 2020. The TRAI also assured that further, the cost of termination of calls will drastically come down over a period of two years and very small residual value, if any, can be absorbed by the TSPs in their tariff offerings. As a result, the TRAI prescribed a Bill and Keep regime for the wireless to wireless calls effective from January 1, 2020.

The Bill and Keep Regime should have been implemented in 2014 as envisaged in the 2011 Report submitted by TRAI to the Hon'ble Supreme Court. Any decision to bring a change in the policy will lead to violation of Supreme Court judgment and affect the pockets of the

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consumer. We are confident that the BAK regime will usher in consumer benefits and bring in technology upgradation in services provided to the consumers.

The argument given with regard to high asymmetry of traffic between a large 4G only operator and the other operators are created to benefit the telecom operators than the consumers. We believe the TRAI, in order to ensure an orderly growth of the telecom sector, had given enough opportunity and time to upgrade the technology and move towards 4G and 5G services.

Unfortunately, as has been seen, few telecom operators have not upgraded their respective technologies and forced the consumers to be in 2G and 3G era. This has also resulted in paying exorbitant and excruciating rates for voice minutes which affects the pockets of the Indian consumer.

In the view of the above, we are sure the introduction of BAK regime will put an end to impacts in tariffs which are in a linear in IUC regime. Therefore, if IUC is reduced, consumer tariff will come down to a considerable extent.

Second, Voice over Long Term Evolution (VoLTE) has already taken over in India to a large extent, and it forms the majority component of the total telecom market; the existing IUC regime is a hindrance in the adaption of VoLTE technology.

In view of the above, we are of the opinion that TRAI's fresh consultations on Inter Connection Usage (IUC) Regime is anti-consumer and unlike to help in growth of the telecom sector in India. For larger interest of the country, we view the government should move ahead and introduce Bill and Keep Regime.

Look forward to your kind intervention.

Thanking you.

With regards

Prashant

Prashant Kumar Jha

President



Cc

Shri Ravi Shankar Prasad
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