



To,

Advisor (F&EA-I)
Telecom Regulatory Authority of India
Mahanagar Door Sanchar bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi-02

No. Regln/ 4-18/2015/

Dated: 17 -03-2020

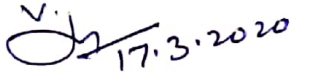
Kind Attn: Shri Kaushal Kishore, Advisor (Finance & Economic Analysis-I), TRAI

Sir,

Sub: BSNL's Counter comments on TRAI's draft Telecommunication Tariff (65th Amendment) Order, 2020 on "Regulation of tariff for Short message Service"

Kindly refer to the TRAI's draft Telecommunication Tariff (65th Amendment) Order, 2020 on "Regulation of tariff for Short message Service". In this context, BSNL's comments on the comments uploaded on TRAI website are as follows:

The mandatory minimum tariff of fifty paisa per SMS for SMS exceeding "100 SMS per SIM per day" for retail customers should continue in spite of technological solutions to detect UCC are being rolled like advanced signature and UCC detect system. This limit of 100 SMS per SIM can be perceived as a preventive measure not only for prevention of UCC but also to curb the spreading of rumors during sensitive situations. It will take time to know the effectiveness of these technical solutions. The usage cap regulation will help, it does not fully address the UCC menace because it is a post-facto measure. It is requested that situation may be reviewed after one year of fully implementation of provisions of Telecom Commercial Communications Customer Preference Regulations, 2018 ("TCCCPR 2018").


(Ved Prakash Verma)
AGM (Regulation-II)