

**"Review Interconnection Usage Charge(IUC) policy"**

1 message

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To: interconnection.trai@gmail.com

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Dear Sir,

In reference to your Consultation Paper on Review of Interconnection Usage Charges (IUC) on 18 September this year, you have categorically asked on the need for review of the date of applicability of Bill & Keep (BAK) Regime in respect of wireless to wireless terminating calls (BAK is to be implemented from 1 January 2020 as per the current IUC Regulation) and any related issues on domestic IUC.

It is a bit difficult to understand as to why, at this stage when there is no trigger or compelling reason, the Authority has started having qualms about its own well-thought of IUC Regulation, 2017 brought out after exhaustive, extensive consultation with all possible stakeholders and comprehensive consideration of all factors. The underlying basis of the Regulation was the maximisation of consumer welfare (i.e. adequate choice, affordable tariff and good quality of services) in a sustained manner and adoption of more efficient technologies are vital for orderly growth of telecom services sector in the country. The Authority had then rightly stated 'if cost-based domestic termination charge is continued for long, it would hamper the movement of sector towards (1) deployment of more efficient technologies; (2) more innovative and customer friendly tariff offerings; and in turn, it would be detrimental to the growth of telecom services sector.

Ideally, BAK was very much due for implementation in September 2017 itself as TRAI was nurturing such intent from 2012 onwards. However, TRAI opted for its introduction in a time-bound manner by giving over two year period to telecom service providers (TSPs) with a view that TSPs would upgrade their network to 4G, although it was not necessary. For the meantime up to 31 December 2019, IUC was fixed at Rs 0.06 per min for off-net termination.

In the view of the above, it's the need of the hour that Bill&Keep (BAK) regime is implemented as scheduled with effect from 1 January 2020 as per TRAI IUC Regulation, Sep 2017. Any tinkering or deferment will sadly defeat the very purpose of regulation that is Consumer Welfare and orderly growth of the telecom services sector in line with global trends. In fact, it may not help any stakeholder — Consumer: greatest loser; Old TSPs: negligible gain, that too temporary; Regulator: dent in credibility; Investors: adverse impact on their confidence.

Kindly do not do any review the IUC regime and introduce bill and keep as you proposed in the year 2017 ( w.e.f 1<sup>st</sup> January, 2020).

Thanking you

With regards

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Cc  
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Shri (Dr) P K Mishra, Principal Secretary to the Prime Minister, Government of [India, South Block, \(Rajpath\), Raisina Hills, New Delhi-110011](#)



