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To

17th October, 2019

Shri Ravi Shankar Prasad

Hon'ble Minister for Electronics, Telecommunications & IT
Department of Telecommunications, Ministry of Telecommunications & IT
Sanchar Bhawan, 20-Ashoka Road
New Delhi-110001

Sub: Consultations and Review of Interconnection Usage Charges

Dear Sir,

This is in reference to TRAI's recent consultation process to "Review the Interconnection Usage Charges Regulations, 2017".

As you may be aware that on 19th September 2017, after initiating hectic consultations, the TRAI announced that Interconnection Usage Charges (IUC) regime will be replaced with Bill and Keep regime with effect from 1st January 2020. Since 2017, the termination charges were reduced to 0.06paise/ per minute and this was supposed to be made zero from 1st January, 2019. The effect of the 2017 regulations undoubtedly benefited the consumers to get advanced telecommunication services (both voice and data) at a cheaper / affordable price.

The Indian telecom sector is currently going through a phase of rapid modernization and advancement. The old technologies are being replaced by more efficient new technologies. All major service providers have either committed to IP based LTE networks or have declared plans of doing so in the future. Voice calls, in future, will be provided using IP-based technology, which is the most efficient mode of delivery by any available parameter, be it cost, quality or efficiency of delivery.

The irony is that majority of the incumbent TSP's network are providing services on 2G/3G platform though they have maximum 4G spectrum. For example, Voda-Idea is holding spectrum capable of providing 4G services which is 1.48 times that of RJIL's spectrum holding. Airtel is also having much higher 4G spectrum which is 1.43 times of RJIL's.

In spite of very large quantity of 4G quantity of 4G spectrum held by Airtel & Voda - Idea, 1588.9 Mhz & 1636 MHz respectively, they have deployed much less number of 4G eNodesBs.

Likewise, majority of the incumbent TSPs' customers on 2G/3G network are offered very high tariffs for voice calls. Airtel has total 320.3 million customers out of which only 119.1 million are 4G customers which is 37% of total customers. Voda-Idea has 383.4 million customers out of which 110.5 million are 4G subscriber. 63% of airtel's customers and 71% of Voda-Idea's customers are still on 2G/3G networks. As against the claims of offering unlimited voice tariffs, the consumers are offered tariffs as high as Rs. 1.5/min for voice calls.

The TSP networks are not keen to pass the fruits of advancement of technology in telecom sector to the consumers rather they are keen to stick to 2G / 3 G services. We request your august office to intervene in the matter and ensure that IUC regime is replaced with Bill and Keep Regime as proposed by TRAI in 2017 and TSP networks are clearly told to move to advanced technology platforms and provide both voice call and data services at a cheaper to the consumers.

Looking forward to a positive response from you.

With regards

Yours Sincerely

Aarti Thapa
Aarti Thapa
President



Copy to

The Principal Secretary to the Prime Minister, Prime Minister's Office
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The Chairman, Telecom Regulatory Authority of India
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