



MAY 19, 2025

To:

Shri. Vijay Kumar, Advisor FEA, TRAI

Tower F, NBCC World Trade Centre, Nauroji Nagar, New Delhi-110029

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Ref: TRAI Pre-Consultation Paper for DLC Dt29APR25

Subject: Arbitrariness in pricing of Circuits for Interconnection by some operators.

Dear Sir,

ZooM India has obtained All India Unified Access License for all 22 circles with NLD & ILD to offer Cloud based PBX (IP-Centrex, Call Center & Contact Center) services to its global customers present in India and to Indian Businesses. This new technology will immensely benefit the Software, Call Center & BPO Business Industry by reducing their cost of communications and increasing productivity. Since signing our first Access License Agreement, it has taken between 1 year to 2 ½ years to establish IP Pol's at six Circles.

Being a small operator using low bandwidth we place order with the respective operators for Pol/Interconnection. As there is no TRAI reference pricing request the Authority to consider to have reference pricing for Interconnection circuits to help new small operators expedite roll outs. Our challenges are detailed in the following page.

Thanking You,

For and on behalf of ZVC INDIA PRIVATE LIMITED (UL Licensee)

(Authorised Signatory)

DINESH K SHIV, Head of Telecom Compliance

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ZVC India (Zoom) comments to TRAI Pre-Consultation Paper for DLC Dt29APR25

Circuits For Interconnection: Being a small operator using low bandwidth we place order with the respective operators for Pol/Interconnection. A lot of time is lost in pricing negotiations and commissioning of these circuits. The regulatory teams of these operators have no influence on the circuit pricing as these are determined by the commercial/enterprise teams.

Also, in case of some operators commercial/enterprises teams are unwilling to provide a quote for discussion/negotiations until interconnect agreements are signed. Our view is that Interconnect Agreement signing, and circuit pricing discussions can be done parallelly as it is done by two different teams viz Regulatory and commercial/enterprise teams respectively. The problems that we have faced in short are:

- A. Two operators have offered reasonable fair price for circuits
- B. Two operators started at high price for circuits and later reduced prices after multiple rounds of negotiations which has delayed Pol's.
- C. One operator has charged us very high prices which essentially is a XC- Cross Connect withing the same building.
- D. One Operator is using a decade old list price. This operator offers 50% to their smallest customers but insisted on 100% list price from us, as we they consider us as their competitors, and hence are of the view that we don't deserve discounts/market rates offered to their other small customers whose annual billing is less than our annual billing.

In view of the foregoing, we request the Authority to consider our request to have reference pricing for Interconnection circuits to help new small operators like us expedite roll outs.

Thanking You,
For and on behalf of ZVC INDIA PRIVATE LIMITED (UL Licensee)

(Authorised Signatory)
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