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TRAI/FY25-26/083
29th December 2025

Shri Sameer Gupta
Advisor (Networks, Spectrum and Licensing-I)
Telecom Regulatory Authority of India,
World Trade Centre, Nauroji Nagar,
New Delhi – 110029

Subject: Bharti Airtel's Counter Comments on Consultation Paper on *Review of existing TRAI Regulations on Interconnection matters*

Reference:

1. **TRAI's Consultation Paper dated 10th November 2025**
2. **Bharti Airtel's comments dated 15th December 2025 to TRAI's Consultation Paper**

Dear Sir,

This is in reference to TRAI's Consultation Paper on *Review of existing TRAI Regulations on Interconnection matters dated 10th November 2025.*

In this regard, please find enclosed our counter comments to the consultation paper for your kind consideration.

Thanking You,

Yours Sincerely,
For **Bharti Airtel Limited**

Rahul Vatts
Chief Regulatory Officer

Encl: a.a

Airtel thanks the Authority for the opportunity to provide its counter comments to responses received on the consultation paper ("CP") on "Review of existing TRAI regulations on Interconnection Matters". These counter comments are an extension of the arguments previously presented in the main response to the CP. For the sake of continuity, here is a quick summary of the key submissions made earlier:

- ✓ *Ceiling for ITC should be revised from ₹0.65/minute to at least ₹4-5/minute immediately to bridge the gap between Indian and global rates to some extent. Further, the Authority should also create a glide path to align ITC with global benchmarks in next 2-3 years.*

- ✓ *Commercial segregation of P2P and A2P traffic should be mandated. Scope of mandatory interconnection regime should be strictly limited to P2P voice and SMS communication only, and telemarketers should be required to establish direct interconnection arrangements with operators terminating under mutually agreed commercial terms.*

- ✓ *Overall termination charge on domestic commercial SMS should be revised from the existing level of ₹0.07 to at least ₹0.11-0.12 (₹0.02 + additional charge of ₹0.09-0.10). Also, a deterrent charge of say, ₹0.50/minute, should be introduced for A2P calls.*

- ✓ *Delivery reports of A2P SMS should be handed over directly by operators to PEs. Incoming call capability should be enabled in 1600xx series, under the same regulatory & charging framework applicable to 1800xx series – i.e. under IN Regulations (with IN interconnect charge of ₹0.52/call).*

- ✓ *With regard to Interconnection Agreements, ensure symmetric commercial terms across all operators, including the PSU operator for a level playing field, recognizing reciprocity as a foundational principle.*

- ✓ *Interconnection should be mandated to be at LSA-level. Existing PoIs at LDCA/SDCA-level should also be migrated to LSA-level within prescribed timelines.*

- ✓ *IP-based interconnection should be mandated for new interconnections. Operators should be mandated to migrate existing TDM-based E1 interconnection to IP-based interconnection within prescribed timelines.*

- ✓ *Origination charges should continue to be under forbearance.*

- ✓ *No need to review existing ceiling of ₹0.35/minute on carriage charges for domestic calls.*

- ✓ *Transit/transit carriage charges should be done away with.*

- ✓ *No need to review the existing termination charges for P2P calls/SMS.*

- ✓ *Only IUC should apply to emergency calls, and there should be no lump sum fees or any other additional charges.*

- ✓ *Port charges should be revised based on actual cost-per-bit of IP-based electronic and optical equipment – with a bi-annual review to ensure they remain fair, competitive, and transparent.*

In the following section, Airtel submits its counter comments on key points raised by some of the stakeholders.

I. Telemarketing and Robo calls:

Some of the stakeholders have advocated that some stakeholders have also submitted there is no need to address the A2P and P2P communications as the same is taken care off well in the TCCCPR, 2018.

Airtel Counter Comments:

1. It is not correct to suggest that there is no need to address the A2P and P2P communications as the same is taken care of well in the TCCCPR, 2018. In this regard, Airtel submits that while the **TCCCPR, 2018** plays an important role in regulating unsolicited commercial communications, it operates largely at a **procedural and consent-management level**. TCCCPR does **not address the underlying interconnection and routing architecture** that allows bulk A2P traffic to be pushed through existing network arrangements.

2. In the absence of **interconnection level segregation**, compliance under TCCCPR alone is insufficient to prevent misuse, as commercial traffic continues to flow through P2P routes without effective network level control and traceability.

3. Further, Airtel reiterates that, considering, that the **nature, scale, and commercial characteristics** of P2P and A2P traffic are fundamentally different, the **current regulatory framework and technical interconnection architecture do not provide for effective segregation between the two**. Consequently, both P2P and commercial A2P traffic continue to be routed through the **same mandatory interconnection arrangements**.

4. With the exponential growth and flooding of A2P traffic, this lack of segregation has become increasingly challenging. The continued use of P2P interconnection arrangements for commercial bulk traffic has created structural vulnerabilities, undermining the effectiveness of existing regulatory controls and network-level safeguards.

5. **Customer Impact Arising from Existing A2P Routing Arrangements:** The continued routing of A2P traffic through P2P interconnection pathways has resulted in recurring consumer harm, including:

   - **High volumes of unsolicited SMS and robo-calls**, as commercial traffic bypasses existing network level filtrations.

   - **Increased exposure to fraud and financial scams**, particularly impersonation, phishing, and OTP-related fraud, exploiting trusted telecom channels.

   - **Erosion of consumer trust in SMS and voice** as reliable communication channels, impacting the effectiveness of legitimate transactional messages.

   - **Delayed or missed critical communications** (banking alerts, service updates, government messages) due to congestion and noise created by bulk A2P traffic.

   - **Limited consumer control, as existing preference** and consent mechanisms are undermined by routing architectures that dilute traceability and enforcement.

6. Further, we submit that certain **Access Service Licensees with negligible or no active subscriber base** have obtained interconnection arrangements primarily to function as **bulk A2P termination routes**, aggregating traffic from call centres and intermediaries and terminating such traffic onto large networks with minimal infrastructure investment. This practice further exploits the existing interconnection framework and worsens the spam and fraud problem.

7. Therefore, in view of the above, **Airtel would like to reiterate that there is an urgent need to address the issue of telemarketing and robo-calls within the interconnection framework. These practices have become a major source of customer inconvenience, spam, and fraud, undermining trust in telecom services.**

8. A possible solution is to **mandate the segregation of P2P and A2P traffic**, limiting the scope of mandatory interconnection strictly to P2P voice and SMS communication. Telemarketers should be required to establish **direct interconnection arrangements with terminating operators for A2P traffic under mutually agreed commercial terms**.

II. Upward Revision of SMS Termination Charge:

Some of the stakeholders has advocated that the SMS Termination charge should be cost-based and adhere to the "work done" principle. An operator, who have established only an SMSC (Short Message Service Centre) should not be compared with full-fledged Telecom Service Providers (TSPs) who have established large mobile networks (BTS/BSC/MSC) and should be liable to pay proportionately more termination charges.

Airtel Counter Comments:

1. At the outset, Airtel reiterates that there is a need for **commercial segregation of P2P and A2P traffic**, with the scope of the **mandatory interconnection regime strictly limited to P2P voice and SMS communications**. A2P traffic should be exchanged only through **direct commercial interconnection arrangements between telemarketers and terminating operators**, under mutually agreed terms.

2. It is further submitted that **TRAI introduced the ₹0.02 SMS termination charge with a clear deterrent intent**, recognizing the **commercial and volume-driven nature of A2P traffic** and the rapid increase in SMS volumes originating from enterprise and telemarketing use cases. The objective was not merely cost recovery, but to discourage bulk messaging and protect consumers from spam.

3. Accordingly, Airtel submits that the existing framework requires **strengthening through a deterrent-based pricing mechanism** for A2P messaging. Introducing an **additional deterrent component over and above the existing ₹0.05 charge under TCCCPR** would act as an effective economic disincentive against misuse, while preserving the integrity of P2P communication routes.

4. Airtel therefore submits that **addressing spam must remain the central objective** of the termination charge framework. A **deterrent-based approach**, rather than a purely cost-based or "work done" methodology, is essential to curb unsolicited and excessive A2P messaging and to restore discipline within the interconnection ecosystem

5. For detailed justification and supporting rationale, the Authority may kindly refer to **Airtel's submission to Question 14** in its main response to the CP.

III. Upward Revision of International Termination Charges ("ITC"):

The entire industry has unanimously requested for upward revision of ITC rates.

Airtel Counter Comments:

1. Airtel reiterates that there is an urgent need to increase the present ceiling of ₹0.65/minute on ITC applicable to international incoming calls to India. It has already been more than 5 years since the last revision.

2. Further, ITC rates in India remains substantially below global norms, placing Indian operators at a structural disadvantage vis-à-vis foreign network. In addition to the few examples provided in our main response to the CP, we now provide the following table

indicating the ILD termination/settlement charges, in order to highlight the stark difference between Indian and global rates:

Sl. No.	Country	Rates (in ₹/minute)
1	United Arab Emirates	12.8
2	Nepal	11.4
3	Japan	5.7
4	Saudi Arabia	9.4
5	Qatar	12.7
6	Nigeria	8.8
7	Grenada	21.7
8	China	5.5
9	Russian Federation	13.4
10	Netherlands	21.3
11	Azerbaijan	24.9
12	Bahrain	8.6
13	Egypt	8.9
14	Spain	5.2
15	Maldives	58.2
16	South Africa	13.1
17	Kazakhstan	15.0
18	Uganda	21.8
19	Georgia	23.8
20	Myanmar	19.1
21	Ireland	9.8
22	Iran	14.0
23	Kenya	14.4
24	Sweden	16.7
25	Mauritius	10.7
26	Tanzania	21.4
27	Poland	17.7
28	Israel	7.3
29	Philippines	9.9
30	Uzbekistan	7.7
31	Austria	8.0
32	Greece	6.1
33	Ghana	17.7
34	Portugal	11.8
35	Iraq	14.7
36	Zambia	30.4

Sl. No.	Country	Rates (in ₹/minute)
37	Belgium	26.9
38	Ethiopia	17.4
39	Jordan	12.4
40	Yemen	9.9
41	Czech Republic	6.1
42	Hungary	6.6
43	Norway	5.9
44	Morocco	40.4
45	Croatia	34.3
46	Cambodia	5.8
47	Seychelles	43.5
48	Finland	30.0
49	Malta	34.0
50	Serbia	32.5
51	Cyprus	13.8
52	Algeria	55.4
53	Sudan	22.5
54	Argentina	15.4
55	Rwanda	18.9
56	Cameroon	28.2
57	Guinea	30.5
58	Liberia	28.6
59	Luxembourg	21.9
60	Senegal	28.7
61	Mozambique	24.6
62	Malawi	30.3
63	Botswana	16.9
64	Iceland	8.5
65	Zimbabwe	37.0
66	Fiji	18.9
67	Chile	19.4
68	Bulgaria	28.1
69	Sierra Leone	31.9
70	Colombia	7.2
71	Madagascar	44.3
72	Slovenia	34.3
73	Peru	11.7
74	Burkina Faso	25.5

S. No.	Country	Rates (in ₹/minute)
75	Tunisia	60.4
76	Guyana	20.4
77	Belarus	31.1
78	Costa Rica	6.2
79	Gabon	28.1
80	Mali	30.7
81	Armenia	18.4
82	Lithuania	41.4
83	Chad	32.3
84	Namibia	9.7
85	Ukraine	18.4
86	Latvia	50.1
87	Panama	24.4
88	Angola	28.0
89	Jamaica	17.8
90	Tajikistan	15.9
91	Albania	35.5
92	Guatemala	12.1
93	Suriname	21.8
94	Uruguay	9.8
95	Niger	22.2
96	Togo	21.9
97	Venezuela	10.9
98	Montenegro	34.3
99	Benin	23.2
100	Estonia	41.4
101	Somalia	36.4
102	Lesotho	36.1
103	Honduras	12.9
104	Ecuador	14.8
105	Tonga	85.0
106	Libya	23.8
107	Burundi	30.2
108	Djibouti	47.1
109	Moldova	24.3
110	Turkmenistan	10.7
111	Nicaragua	21.0
112	El Salvador	16.5

S. No.	Country	Rates (in ₹/minute)
113	Barbados	17.2
114	Palau	30.2
115	Haiti	21.9
116	Bolivia	15.1
117	Dominica	16.7
118	Aruba	20.9
119	Solomon Islands	72.8
120	Andorra	13.4

3. The upward revision of ITC rates will not affect Indian customers, as international incoming calls are not charged to the recipient. Rather, it will act as a deterrent for foreign spammers currently exploiting the low cost of termination in India, and support the efforts being taken by the industry and the Authority alike for controlling spam and making the networks safer for customers. It will also benefit the exchequer by improving India’s balance of payments in international telecom settlements.

4. <u>**Therefore, Airtel recommends the following:**</u>

   a. **<u>The ceiling for ITC should be revised from ₹0.65/minute to at least ₹4-5/minute immediately</u> to bridge the gap between Indian and global rates to some extent.**

   b. **Since the gap will remain significant even with the suggested rates, the Authority should also create a <u>glide path to align the ITC with global benchmarks in the next 2-3 years</u>.**

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