

To
Shri Raj Pal,
Adviser (F&EA)
Telecom Regulatory Authority of India,
Jawahar Lal Nehru Marg,
New Delhi-110002

Subject: Response to TRAI's Pre-Consultation Paper on Review of Tariff for National Roaming Dated 20th December, 2012

Dear Sir,

With Reference to the above consultation Paper, I'd like to have my comments reserved to just three questions

Question (IV) - In your opinion, should the burden of the cost for the incoming call be removed from the roaming subscriber? If yes, how should this cost be recovered? Would removal of the burden of the cost for the incoming call while roaming lead to an increase in overall call traffic across the country?

- The Burden of Incoming Calls for a Consumer will vary on case to case Basis
- For National Operator having Spectrum in all circles, **On-Net Incoming Calls in Roaming Area must be made Free with immediate effect** as the Operator does not bear any interconnect fees and should be made to treat his roaming customers at par with local home area customers.
 - Off-Net incoming calls could be charged based on the cost structure supplied by the Telecom Operator
 - For an Operator not having Spectrum in the Roaming Area, calls could be charged based on the cost structure

Question (VII) - In your opinion, should TRAI also prescribe a tariff for SMS while roaming? If your response is in the affirmative, what method of calculation for such tariff should be adopted? In case cost based tariffs are to be prescribed, the service providers may kindly provide the cost data and costing methodology to be adopted.

- Yes TRAI must prescribe Tariffs for SMS in Roaming Areas as suggested below
- For National Operators with Spectrum in all Circles - Since the network cost to send / receive a SMS is paltry compared to voice calls, Home Area or Roaming Area for the purpose of SMS, **Operators must be made to treat it as Home Area SMS Only** including any **benefits of a SMS Packs** the customer may have availed.



Question (IX) - Is there any other relevant issue related to 'tariff for national roaming' which the Authority should keep in mind while carrying out the proposed comprehensive review of the framework for tariff of national roaming services?

- Telecom Operators must be given the liberty to create Zones like South Zone which will comprise the States of Karnataka, Kerala, Tamilnadu and Andhra Pradesh and announce **Zonal Tariff Structures**. Migrating to One Nation, One Plan is always welcome though.
- TRAI must come with aggressive incentives and recommend access to Universal Service Obligation Fees for all operators who are reaching out to remote places and helping people connect to the rest of the world wirelessly.

Thanking You,

Sincerely

Chetan S Patil

