

To:
Shri Manish Sinha,
Telecom Regulatory Authority of India, ("TRAI")

Date: 12-October-2014

BY EMAIL

Sir,

SUB: Objections to Draft TTO (59th Amendment) submitted on behalf of INDIA AGAINST CORRUPTION.

We thank the Authority for the opportunity to comment on the proposed TTO amendment/s.

Please find below our brief objections / comments to the subject draft TTO amendment/s.

1) That we, the **India Against Corruption** 'jan andolan', firmly oppose the extension of the TT order for mandatory reporting of tariffs to the ISPs.

2) Our reasons for this lie in **clause 7 of the TTO 1999 which is completely discriminatory for the small consumers vis-a-vis the corporate and bulk users** whose negotiated tariffs are exempt from reporting. As a consequence Telcos / ISPs are selling way below cost to corporates but gouging the unorganised general consumers. Accordingly, India Against Corruption has decided to organise the general category of telecom and internet consumers to negotiate better tariffs for their communication, and oppose such discriminatory and predatory amendments **which cause us to doubt the integrity of the person/s proposing it.**

3) Nowadays with convergence between Voice and Data networks, IAC fails to see why, say, a telecom / data provider RCOM (Reliance ADAG) is offering highly attractive call + data packages to certain groups for youth to communicate with each other, but will not offer the same facilities to our body's very substantial membership, who are in a different age group to communicate with each other.

4) Similarly, we also fail to see why the almost free tariff loot of MTNL for public servants is exempt from reporting, whereas only the vastly over-priced schemes available to the general paying public are being reported to TRAI and to Parliament to depict that this telco is in the best of health.

5) Likewise a 5 / 7star hotel gets all broadcast television channels, including premium foreign channels, for as low as Rs. 75 per receiver, whereas the same package is

around Rs. 325 to the ordinary consumers. Some VIP customers of course get free connections which are unreported.

6) We say that reporting exemption for small ISPs, is a loophole waiting to be exploited.

7) Accordingly we call for a level playing field, in that all telecom tariffs and connections must be reported equally to the regulator and should also be made available under RTI to those citizens interested in having such information on application.

Submitted in the larger public interest of behalf of IAC. We would like to be able to comment on other comments received.

With best wishes

yours faithfully

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