

(FCAWB)
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April 26, 2010

To,
Sri. Arvind Kumar
Joint Advisor (I&FN)
Telecom Regulatory Authority of India

Sub: Comments on the issues raised in the consultation paper on "collocation charges"

Dear Sir,

This has reference to your letter no. F.No.409-2/2010-I&FN dated 8th April 2010 on the above subject.

On perusing the consultation paper on the above subject it seems that some innovative ideas to be brought out so as to make successful this new type of project.

It is now well understood that the telecommunication market is now very competitive therefore our main contention will be to offer least possible charges to customers so that prospects of healthy business environment is resulted in the multiplicity of service providers in the access and long distance markets.

In my opinion in a subcontinent like India only twenty two telecommunications service areas will not be sufficient enough to cope with the demand so expansion in future may be required.

1. Processing of the application should be well defined by providing all relevant information such as technical, financial, infrastructure-wise and affordability of the consumers. All these should be considered because this will have a cascading effect. It will be in a prescribed form checked by TRAI, consumers and service providers.

The time lines will depend on the fulfillment of all the above procedures in a reasonable timeframe considering the various items specified. Time line cannot be drawn right now.

2. Collocation application may be rejected by the service providers only on cogent ground such as the non-fulfillment of the above procedures.

3. Collocation agreement may be terminated by the collocation provider if there is any breach of trust committed by the seeker.

4. The agreement can be rejected provided both the parties in consultation with TRAI will justify the deficiency either with provider or with the seeker. No party will arbitrarily terminate the agreement without assigning proper reasons.

5. It Should be mandatory and posted in the web-site. If any irregularities are found then it can be challenged by any of the stakeholders.
6. Bay and Rack system should be technically handled.
7. The charge will be on the basis of the item-wise breakup or on the basis of consolidated cost. Both will be compared and the lesser one should be adopted for the benefit of the consumers.
8. Costing of methodology should be based on the items given in the questionnaires. To run the collocation system smoothly the total cost should be within the reasonable budget.
9. This business will be such that the receivers affordability and convenience should be preferred. So business providers should think over regarding their rate of profitability keeping in view the interest of the consumers.
10. There should always be a well defined criteria for allowing collocation provided to retain space for own need for further expansion.
11. There should be options to the collocation seekers for carrying operation and maintenance of the collocated equipments with full security.
12. It depends on various aspect of the company which needs to be decided first. The share of the company will be floated or not will depend on the nature of the business.
13. The seeker and provider will share the cost which will be depending on the nature of the company. If the seeker or the provider is the shareholder of the company then they will enjoy the proportionate vale of profit, whatever be the situation, the service should be purchased.
14. We will definitely ask for draft for our suggestions if required that will be reviewed. Our main focus to safe guard the interest of the consumers.

Thanking you,
Yours truly,

Sd/-
(Mala Banerjee)
President

