



DIGITAL
LIFE

RJIL/TRAI/2019-20/359
18th October 2019

To,

**Shri Sunil Kumar Singhal,
Advisor (Broadband & Policy Analysis),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg,
New Delhi - 110002**

Subject: Comments on TRAI's Consultation paper on 'Review of Interconnection Usage Charges' (Consultation Paper No.13/2019 dated 18th September 2019).

Dear Sir,

Please find attached comments of Reliance Jio Infocomm Limited on the issues raised in the Consultation Paper on 'Review of Interconnection Usage Charges' (Consultation Paper No.13/2019 dated 18th September 2019).

Thanking You,

Yours sincerely,
For **Reliance Jio Infocomm Limited,**

Kapoor Singh Guliani
Authorised Signatory



Encl.: As above.

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**RELIANCE JIO INFOCOMM LTD'S COMMENTS ON TRAI'S CONSULTATION PAPER ON
"REVIEW OF INTERCONNECTION USAGE CHARGES"
(Consultation Paper No. 13/2019 Dated 18th September 2019)**

Preamble :

The Consultation Paper undermines and sabotages Hon. Prime Minister's ambitious DIGITAL INDIA vision and mission

1. At the outset, we submit that the Consultation Paper issued by the Authority on 18th September 2019 seeking views of the stakeholders on the need to revise the notified applicable date for implementation of Bill and Keep (BAK) Regime is not only **wholly arbitrary, bad in law, unwarranted, and anti-poor**, but it also **adversely affects the credibility of the Authority and investor's confidence**.
2. More importantly, it undermines, frustrates and sabotages **Honourable Prime Minister's ambitious vision for the Digital India mission**.

The website of the Digital India mission clearly states:

"The vision of Digital India programme is to transform India into a digitally empowered society and knowledge economy." Declaring "**Digital Infrastructure as a Utility to Every Citizen**", it lists the following as its key objectives –

- a) Availability of high speed internet as a core utility for delivery of services to citizens
 - b) Cradle to grave digital identity that is unique, lifelong, online and authenticable to every citizen
 - c) Mobile phone & bank account enabling citizen participation in digital & financial space
3. The Consultation Paper aids and abets sabotage of the Hon. Prime Minister's Digital India mission because it protects and perpetuates the vested interests of certain incumbent telecom operators who do want their large body of 2G customers to forever remain digitally disempowered and deprived of the fruits of the Digital Revolution. These 2G customers – who number as many as 476 million and belong to the under-privileged section of India's population – have been excluded from the Government's promise of "Digital Infrastructure as a Utility to Every Citizen" because they cannot use the most fundamental piece of this Digital Infrastructure – Internet.
 4. By deliberately refusing to end their 2G services and upgrade their networks to 4G, these incumbent operators are exploiting their 2G customers in three ways:

