



No.TCL/TAX/LF/2014-15

September 22, 2014.

**Shri M. P. Tangirala.**  
Advisor (F & EA-II),  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg,  
New Delhi-110002.

Sub: TCL Counter comments-Consultation paper on the definition of Revenue Base (AGR) for the reckoning of License Fee and Spectrum Usage Charges.

Respected Sir,

This is in continuation to our response vide letter No.TCL/Tax/RB(AGR)/2014-15 dated 15<sup>th</sup> September, towards consultation paper (CP) on the subject cited above. We have gone through the responses of other operators/associations/consultants, posted by authority on its web-site. In this connection, we observe that in response to question No.24 of the said CP, some of the responses have suggested deduction of LF at source as far as PTC payable by one TSP/licensee to another, in the interest of easy verification of deductions claimed.

In this regards, TCL is of the firm view that LF deduction at source, should not be considered given the complications viz., PTC payable by licensed TSPs like ILDOs in India to TSPs like foreign carriers outside India to which ILDOs are required to interconnect and exchange traffic both for Voice and Data services as per its license, wherein it could potentially result in ADD-ON cost to the licensed TSPs in India and thereby to the end customer/subscriber. Apart from this, LFDS would further complicate the procedure and increase the administrative hassles in terms of issuing the certificates, reconciliation of data, filing the returns thereof etc.

It is requested that this issue may kindly be considered before considering any scheme based on LF deduction at source.

Thanking you,

Yours faithfully,  
For Tata Communications Limited,

(Nageswari S.)

Sr. Vice President (Finance)

**TATA COMMUNICATIONS**

Tata Communications Limited

Regd Office VSB Mahatma Gandhi Road Fort Mumbai 400 001 India CIN - L64200MH1986PLC039266  
Tel + 91 22 6657 8765 Fax + 91 22 6639 5162 Website [www.tatacommunications.com](http://www.tatacommunications.com)