Dear Sir:

This is with reference to the attached NOTICE TRAI regarding reviewing of reporting system of ASR. In this regard, please find below our comments as required by the Authority:

Sl. No.	Issues	Comments
1	Product/Network elements under various telecom licensed services	Network elements are correct. As far as product are concerned, roaming should be separated for getting correct view. It should be in roaming & Out roaming only, as in roaming can't be bifurcated into postpaid & prepaid. It can only be national & international in roamers.
2	Periodicity & Time Period of submission of accounting separation reports	Time extension should be given for submission of ASR for genuine reason and submission of revised ASR should also be permitted and time of submission should be 30th October.
3	Requirements relating to adoption of accounting separation reports by Board of Directors of the Company and Audit thereof	Basis submission at point No. 2 accordingly timelines be adjusted for adoption of ASR also.

We are hopeful that Authority will consider our points for the incorporation while making changes in the reporting of Accounting Separation Regulations.

Regards

Meena Bisht

Regulatory Affairs

Mobile #: 9310225538