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Ref No. RP/FY 16-17/122/004

August 3, 2016

To

Advisor (BB& PA)

Sh. Arvind Kumar

Telecom Regulatory Authority of India

Mahanagar Doorsanchar Bhawan

Jawahar Lal Nehru Marg

New Delhi - 110002

Sub: Request of M/s Reliance Jio Infocomm Limited ("RJIL") for augmentation of POI's.

Reference:

- i. **TRAI letter no. 10-6/2016-BB&PA dated 19.07.2016**
- ii. **Airtel email communication dated 27th July 2016 to RJIL**

Dear Sir,

This is in reference to your letter dated 19.07.2016 on the captioned subject.

Before we make any submissions on the subject, we would like to highlight that RJIL's network is presently being used for testing of services only. In normal cases, the initial POI's commissioned with 1-2 E1s are sufficient for test use till the date of commercial launch. But, the traffic being handed over by RJIL at the interconnect links is completely disproportionate to any test use. Further, the test traffic is not only high but is abysmally imbalanced.

We apprehend that this abnormal utilization is on account of free voice offerings made on a large scale by RJIL. It is equally relevant to mention that the traffic handed over to Airtel at the POI links between Airtel and RJIL access networks is highly skewed with almost 90% of the total traffic terminating into Airtel network while merely 10% is being directed towards RJIL network. This issue warrants a serious deliberation in view of the fact that the present IUC regime assumes a minor imbalance in traffic and therefore, the presently deployed networks assume a nearly symmetric traffic from other operators. But, the imbalance in traffic of this magnitude defies the underlying assumption of fixation of IUC on incremental cost model (LRIC) instead of Fully Allocated Cost (FAC). Further, such an imbalance will not only require sizable augmentation at the POIs but will also call for corresponding augmentation in the radio access network.

We therefore, request TRAI to direct RJIL to take measures which ensure that the traffic is nearly balanced.

On the issue of augmentation raised by RJIL, we submit that we have accorded due consideration to the request of RJIL for augmentation of POI's and have already initiated necessary action in furtherance of the same.

We have calculated the capacity required to bring the utilization around 40 to 50% and accordingly, derived the additional E1's necessary to sustain the said traffic trend.

A snapshot on the current working E1's as well as additional E1's required are capitulated below:

Capacity	No. of E1's required	No. of E1 presently operational	No. of E1s released
Airtel Access - RJIL Access	387	122	265
Airtel Access - RJIL NLD	118	41	77
Total	505	163	342

We would also like to bring to your kind notice that the number of E1 links, presently provided to RJIO, for the 1.5 Mn test connections are almost three times of the number of E1 links operating with other leading operators. The following table shows the number of subscribers corresponding an E1 link provisioned at Pol:

TSP	E1 links used for Incoming calls at Pols	Total Wireless Subscriber Base	Subscriber per Incoming E1s
Vodafone	22,988	197,993,415	12292
Idea	21,830	174,686,433	11332
TTSL	9,818	59,700,689	11472
RJIL*	466	1,500,000	4307

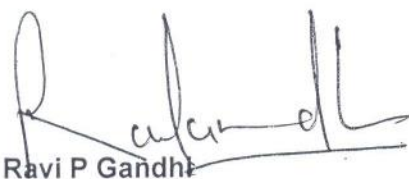
**The test subscribers reported in media*

Vide our emails dated 27th July 2016, we have already extended intimation to RJIL on the proposed plan and they are aligned on the same. Further augmentations of Pol's shall be undertaken as per the terms of the interconnect agreement and on the basis of traffic trends post their commercial launch.

Further, we would also like to highlight that our networks are not designed to terminate traffic caused due to free calls offered by any operator, and we have to ensure and take necessary measures so that such traffic does not choke our network and degrade the quality of service for our own customers.

Thanking You

For **Bharti Airtel Limited**



Ravi P Gandhi
Chief Regulatory Officer

CC: Secretary, TRAI