



COAI Position Paper on Interconnection

COAI supports following Principles of Interconnection:

1. Cost based IUC Charges

- Adoption of a robust cost model for determination of IUC charges.
- Inclusion of all cost elements that are included in a cost model as per international best practice.
- Use of the Hybrid FLLRIC approach which is also in consonance with international best practice.
 - The hybrid model of FLLRIC approach provides a view on likely costs of the network going forward verified against actual past performance and further allows detailed scenario and sensitivity modeling to be performed. (For hypothetical efficient operator)

2. Publication of RIO (Reference Interconnect Offer)

- A Service Provider with significant market power should be required to publish, a Reference Interconnect Offer (RIO).
- A published RIO may be changed only with the prior written approval of TRAI
- In the absence of agreement on the terms of interconnection between the two interconnecting parties, the Model RIO published by TRAI must prevail.

3. Augmentation of Capacity of Interconnection in a timely and adequate manner

- All Interconnection / Points of Interconnect (POI's) should be provided/augmented by the Interconnection Provider within a period of **60 days** from the date of the Interconnection Seeker applying for the POI/augmentation.
- In case of inability of Interconnection Provider to provide the POI/augmentation within the said period of **60 days** for reasons of it not being technically feasible, the Interconnection Provider shall approach TRAI for extension of time at least **30 days** before the expiry of the said 60 days period, with details of the reasons for such inability.
- The TRAI may in its sole discretion either grant or reject such request and if granted, TRAI may grant the same for such reasonable period as the facts of each case may demand.
- The augmentation demands of the interconnection seeker should be known well in advance by the interconnection provider.



- The augmentation processes should be implemented in a transparent and non-discriminatory manner and interconnection should be provided to operators on a first come-first serve basis.
 - Interconnection Provider should refund the advance with applicable interest in case no additional E1's are provided by them to the interconnection seeker.
- 4. New Entrant to be Interconnection seeker for 2 years, whereafter costs of augmentation to be shared in proportion of outgoing traffic.**
- 5. Principle of Reciprocity to be followed for**
- Interest on delayed payments,
 - Provision and amounts of Bank Guarantees,
 - Charges for Co locating equipment, etc.
- 6. Mandatory Direct Connectivity**
- Direct interconnectivity among all Telecom Service Providers in the licensed SERVICE AREA should be mandatory except in exceptional circumstances where both parties mutually feel that such direct connectivity is not warranted.
 - Transit Charge to be used as an exception rather than a rule.
- 7. Minimum notice period of 21 days before any disconnection of POI's**
- During this period the concerned Service Providers shall make all attempts to mutually settle the dispute.
- 8. Netting off of IUC Payments between the operators.**
- 9. Notwithstanding anything contained in this Licence or in any Interconnect Agreement between Service Providers each and all mutually negotiated terms of Interconnection should be subject to and within the overall parameters of the Interconnect Regulations / Directions / Decisions/ Orders/Guidelines of TRAI and in case of conflict between the two the TRAI's Regulations / Directions / Decisions/Guidelines should prevail.**
