



**PAKISTAN TELECOMMUNICATION AUTHORITY
HEADQUARTERS, F-5/1, ISLAMABAD**

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www.pta.gov.pk

**Re:
World Call Telecom Limited**

Enforcement Order under Section 23 of the Pakistan Telecommunication (Re-organization) Act, 1996 read with sub-rule (4) of Rule 9 of the Telecom Rules, 2000

Date of Issuance of Show Cause Notices: 6th January, 2009 &
20th March, 2009

Date of Hearing: 30th April, 2009
Venue of Hearing: PTA HQs, Islamabad

The Authority Present:

Dr. Mohammed Yaseen:	Chairman
S.Nasrul Karim A. Ghaznavi:	Member (Finance)
Dr. Khawar Siddique Khokhar:	Member (Technical)

The Issue:

“Less reporting of international telephony minutes and use of geographic numbers issued for local loop services outside Pakistan”

Decision of the Authority:

By this order, we, the Pakistan Telecommunication Authority (the “Authority”) intends to dispose of the show cause notices dated 6th January, 2009 (the “1st notice”) and 20th March, 2009 (the “2nd notice”) issued to M/s World Call Telecom Limited (the “licensee”), engaged in the business of providing telecommunication services (Local Loop-LL & Long Distance and International-LDI) in Pakistan pursuant to the non-exclusive licenses No.LL-09-2004 dated 16th July, 2004 for Licensed Regions of LTR, CTR, FTR, NTR-1, MTR, GTR, KTR and STR-1 (the “LL license”) and No. LDI-02(01)-2004 dated 14th July, 2004 (the “LDI license”) issued by the Authority.

2. Reason to issue 1st and 2nd show cause notice:

2.1. The circumstances in which the aforesaid two notices were issued to the licensee are stated below in brief:

(a). **Legal provisions:**

(i). As a licensee of the Authority, M/s Worldcall Telecom Ltd. is required to comply with the provisions of the prevailing regulatory laws comprising of the Pakistan Telecommunication (Re-organization) Act, 1996 (the “Act”), Access Promotion Rules, 2004 (the “AP Rules”), the regulations framed by the Authority under the Act including Access Promotion Regulation, 2005 (the “AP Regulations”), the Number Allocation and Administration, Regulations, 2005 (the “Numbering Regulations”) and conditions of its licenses.

(ii). As per section 23 of the Act, where a licensee contravenes any provision of the Act or the rules made thereunder or any term or condition of the license, the Authority may by a written notice require the licensee to show cause within thirty days as to why an enforcement order of levying a fine upto three hundred and fifty million rupees, or suspension or termination of the License or imposition of additional license conditions may not be issued against it.

(iii). As per section 5(2) (1) read with section 5(2) (q) of the Act, the Authority has the power to “*collect information with respect to telecommunications within and outside Pakistan*” and to “*regulate the allocation of revenues from international telephony service, other than revenues from leased circuits, between interconnecting licensees that handle international telephony service and between any such licensee*”.

(iv). As per sub-rule 1 (a) of rule 12 of the AP Rules, LDI licensee shall report to the Authority on monthly basis “*The total number of minutes of Incoming International Telephony Service that is carried by that LDI Licenses and delivered to the telecommunication system of each LL Licensee and Mobile Licensee by country of origin*”.

(v). As per sub-rule 4(a) of rule 12 of the AP Rules, “*The Authority may, by notice to a licensee, require it to, provide such additional information as the Authority may request in respect of international telephony service or its agreements or arrangements with Corresponding Operators*”.

(vi). As per sub-regulation 1 of regulation 11 of the AP Regulations, “*the LDI, LL and Mobile Licenses shall submit the report/information to the Authority in accordance with rule 12 of Access Promotion Rules*”.

(vii). As per sub-regulation 2 of regulation 11 of the AP Regulations, “*The information referred to in sub-regulation (1) shall be submitted by the LDI and LL./Mobile Licensee, as the case may be, within thirty days of close of the month to which such information/report relates*”.

(viii). vide clause 6.4.1 read with clause 6.3.1 of the LL & LDI license the licensee is required to furnish and provide such information as the Authority may request regarding the licensee’s network plan, network and terminal standards, links utilized, financial

information, costs and accounts or any such other information as the Authority may from time to time require in connection with its responsibilities.

(ix). As per the Authority's directive vide No.1-33/05/Engg/PTA dated 23rd September, 2005 read with clause 3.1.3 of the license, all the LDI licensees were directed to use carriers selection codes in case of non-availability of A-Party (calling party) number.

(x). vide sub-rule 4(a) of rule 12 of the AP Rules, the Authority directed the licensee to provide the Call Detail Records (CDRs) to the PTA's Vigilance Cell on monthly basis pertaining to international incoming traffic.

(xi). vide clauses 1.1.1 and 13.2 of the LL licenses the licensee is authorized to provide Licensed Services in the Licensed Region described in Appendix-1 of the licenses and Licensed Services means all Mandatory Services and other Telecommunication Services not prohibited under the license.

(xii). vide clause 1.1.3(a) and (b) of the LL licenses, the licensee is not authorized to provide Telecommunication Services outside the Licensed Region and to interconnect its Telecommunication System with the Telecommunication System of a service providers that provides Telecommunication Services outside Pakistan and under clause 1.1.3 (g) of the LL licenses the licensee is not authorized to establish, maintain or operate a Telecommunication System to provide Telecommunication Service that is not authorized in the license.

(xiii). the licensee has been assigned numbering block and short codes pursuant to condition 2.1 of the LL license, regulations 3(1) and 16 of the Numbering Regulations to be used for its Licensed Services within the Licensed Regions and shall be used in the specific purpose and manner as approved by the Authority pursuant to regulation 14(1)(b) of the Numbering Regulations. The licensee is further obliged vide clause 1.1.5 (e) of the license to follow numbering plan for Basic Public Telephone Access Services adopted by the Authority.

(b). **Nature of contravention:**

Pursuant to the aforesaid provisions the licensee submitted the required reports for the months of July, 2008 to October, 2008 of incoming international telephony calls to the Authority, which were reconciled and compared with reports of other access providers and CDRs of the licensee and with Internet Protocol Detail Record collected from the International Traffic Monitoring System installed by the Authority, which revealed that:

(i). that a total of 6,948,969/- minutes terminated on Mobile Network were not found in the licensee's CDRs.

(ii). that around 40% of concealed calls terminated on Mobile networks does not have A-party number i.e. terminated with no CLI information.

(iii). that around five (5) million minutes present in the ITMS IPDRs and terminated on Mobile Networks have not been included in the licensee's CDRs.

(iv). that traffic terminated by geographical numbers of the licensee local loop system being used outside Pakistan through the licensee's IP addresses, which is also concealed, and

(v). that it used unauthorisedly its more than two thousands locally allocated numbers against LL licenses outside Pakistan by misusing Direct Inward Dialing technique and by mapping its numbers against IP addresses, i.e., 85.90.229.204 and 85.90.229.205 for origination and termination of international telephony minutes/calls.

2.2. It was found that the licensee had shown over eleven million minutes (i.e. 6,948,969 + 05 million) incoming international telephony minutes less than that of the actual minutes. This fact was corroborated by the analysis carried out by matching with the licensee's CDR and CDRs of other interconnect partners (access providers) and IPDR collected from ITMS. The licensee was, thus, found in misreporting of incoming international telephony minutes, hence, concealed the real/actual facts/data from the Authority, which constitutes violation of the terms and conditions of the license, the AP Rules and the AP Regulations, as referred to in Para 2.1(a), above, in addition also found involved in origination and termination of international calls through its local loop geographic numbers contrary to license terms and conditions and Numbering Regulations, for which reasons the 1st and 2nd notice were issued to the licensee.

3. Reply to 1st notice by the licensee:

3.1. The licensee replied the 1st show cause notice vide its letter dated 31st January, 2009 and 2nd April, 2009 in the following terms:

(a). Vide letter dated 31st January, 2009:

That the telecommunication sector in Pakistan has witnessed significant growth and development due to the liberal foreign direct investment policy of the Government of Pakistan. The deregulation and privatization in this sector has contributed to this growth along with independent regulatory regime which has been put in place by the Pakistan Telecommunication Authority.

Over the years, Worldcall has contributed exceptional volumes to the National exchequer in this segment. The level of operational strength and depth achieved by Worldcall under the guidance of PTA has solely been due to its professional focus and a committed investment in development of our capabilities.

Reference to the Show Cause Notice dated 6th January, 2009; respectfully it is submitted that a new Huawei switch was added in our network in July'2008 and due to some reporting error 6,434,162 international minutes terminated through the new switch on one of our interconnect partner M/s Telenor Pakistan were erroneously not accounted for

in the data reported earlier to the Authority for the months of July, August, September and October'2008. Complete CDRs are enclosed herewith for your reference please.

This error in reporting could not be identified earlier since our reported international minutes were always in excess to the minutes invoiced by Telenor. Detail of the minutes reported by Worldcall to the Authority and the minutes invoiced by Telenor for the months of July, August, September and October'2008 are given below for your reference please,

S/No.	Month	International Minutes Invoiced by Telenor	International Minutes Reported by Worldcall (Int'l Minutes Terminated on Telenor)
1.	July'2008	0	6,882,969
2.	August'2008	0	6,262,502
3.	September'2008	168,037	6,293,882
4.	October'2008	2,772,882	7,631,081
Total		2,940,919	27,070,434

A thorough internal technical audit was conducted to point out any further discrepancies and it was identified that due to some minor routing error additional 160534 minutes on Mobilink, 387 minutes on Ufone and 432 international minutes terminated on Warid from July to October'2008 could not be reported in the data earlier submitted to the Authority. As a result of this audit we have taken all necessary steps at our end to ensure elimination of such reporting errors in future.

Regarding Null A-party numbers identified in our CDRs; it is submitted that we have combined trunk groups for national and international traffic termination with Telenor. The operator identification insertion patch was not applied on these trunks as the SOP is for applying this patch on all international trunks. Segregation of trunks with Telenor for National and International traffics has been completed in Lahore and the operator ID patch has been applied, same is in process in Rawalpindi and Karachi also and is expected to be in place within the next month.

Reference to the comparison of IPDRs and concealing of around five million minutes terminated on mobile networks; it is stated that these 5 million minutes identified by the Authority in the IPDRs could be part of the 6.59 million minutes mentioned above as we have not been able to identify any additional minutes in our CDRs which were not reported to the Authority.

Regarding termination of traffic by geographical numbers being used outside Pakistan; we have already apprised the Authority vide our letter # No. WTL-05/4-1/586 January 01, 2009 that VoIP services were being offered in accordance with PTA Clarification Regarding Launching of VoIP Services vide letter # M (T) 167-08/PTA dated 10th March, 2008. However, the latest PTA Clarifications on use of IP Telephony Services vide letter No.MISC/IP/S&D/PTA/2008 dated October 31, 2008 are being implemented in true letter & spirit. Moreover, it is submitted that inbound' call service into Pakistan was restricted

on this service and detailed investigation revealed that the IPDRs recorded by the international traffic monitoring system (ITMS) were the result of a minor routing error because of which our national traffic over-flow was erroneously routed through one of our associated switching facilities. All this traffic which was routed through the switch is WTL own subscriber traffic overflow and was terminated on our interconnect partners through our International interconnection trunks, for which APC and USF is duly accounted for.

We have always been particular in compliance of our obligations. The unintentional lapse on our part is highly regretted; we reaffirm our commitment to work in line with PTA policy and objectives and reassure the Authority that such unfortunate incidents would not be recurred in the future. Revised international traffic data for the months from July to October'2008 would be submitted to the Authority in due course.

In view of the above, it is respectfully prayed that the Authority would give a lenient consideration to our submissions in response to the Show Cause Notice # 2-06/08(AP/CA) PTA/527 dated January 6, 2009, as this act of omission was only due to unintentional oversight and we assure the Authority that all necessary steps required to ensure complete rectification of the contravention have been taken.

(b). Vide letter dated 2nd April, 2009:

Reference to our letter No. WTL-05/4-1/597 dated 31st January, 2009 (copy attached), please find below the summary of revised international traffic minutes terminated in the months from July'2008 to October' 2008 additionally summary of revised international traffic for the months of November' 2008 to February'2009 is also listed below. Complete CDRs for each month on 08 DVDs are also enclosed.

Partner	July,08	August, 08	Septembers	October,08	November,08	December,08	January, 09	February,09
Dial Log	11,014	11,034	8,640	14,369	5,067	3,957	2,924	3,349
Mobilink	14,274,184	12,493,386	13,336,450	11,903,230	12,196,606	12,101,252	13,072,441	12,895,801
NTC				6,416	6,999	6,706	27,001	34,192
PTCL	14,843,582	14,164,592	10,882,247	11,580,108	11,463,406	11,119,376	13,098,018	11,595,266
SCO	424,244	440,401	361,781	401,747	546,903	515,245	491,600	462,343
Telecard	26,414	22,554	19,133	22,191	21,299	14,632	14,320	25,308
Telenor	8,870,723	8,374,629	7,835,975	8,415,566	9,851,613	8,378,003	10,037,270	10,555,699
Ufone	11	243,026	2,000,198	3,654,626	6,170,388	6,678,223	8,068,397	6,543,925
Warid	4,004,562	4,176,948	3,435,536	3,791,245	4,673,451	4,693,254	5,447,772	4,941,835
Local loop	153,048	163,202	122,833	131,727	185,226	187,519	222,403	201,017
Total	42,607,781	40,089,773	38,002,792	39,921,226	45,120,959	43,698,167	50,482,146	47,258,736

In view of the above, it is again respectfully prayed that the Authority would give a lenient consideration to our submissions in response to the Show Cause Notice # 2-06/08(AP/CA) PTA/527 dated January 6, 2009, as this act of omission was only due to

unintentional oversight and we assure the Authority that all necessary steps required to ensure complete rectification of the contravention have been taken.

We reaffirm our commitment to work in line with PTA policy and objectives and reassure the Authority that such unfortunate incidents would not be recurrent in the future.

- (c). Vide letter dated 15th January, 2009 the licensee asked for the following information:

Reference to the above noted correspondence; respectfully it is submitted that to respond to your subject show cause notice we require the following support data to analyze the identified discrepancies:

- *Complete IPDR collected from the ITMC for five (5) million minutes.*
- *Complete CDRs collected from Worldcall interconnect partners (access providers) for 6,948,969 minutes.*
- *Complete CDRs for the months of July - October, 2008 terminated on Mobile Network with no CLI.*

Rest assured we are determined to resolve and rectify the identified discrepancies to the Authority's satisfaction and reaffirm our commitment to work in line with PTA policy and objectives

- (d). Vide PTA letter dated 19th February, 2009, the aforesaid request was responded in the following manner:

Please find attached herewith a CD containing sample IPDRs in Excel format pursuant to your request No.1. However, for the remaining two requests you may collect/extract the requisite data from your interconnect partners and your own CDRs.

- (e). Vide letter dated 24th April, 2009:

Reference to the above noted correspondence; respectfully it is submitted that detailed analysis of the sample IPDRs in which 1002 records were provided by PTA was carried out, our findings/submissions in this respect are as follows;

More than 99% of the sample CDRs are of international call termination duly reported to the Authority vide our letter No. WTL-05/4-1/620 dated April 02, 2009. It is our observation that there is a significant time stamp variance due to clock synchronization issues between ITMS and WTL switches, which is most probably the reason why these CDRs were not reconciled with the WTL provided CDRs. If deemed necessary, complete ITMS IPDRs can be reconciled with WTL international termination CDRs.

Two IP addresses, identified by the Authority, 203.81.224.135 & 203.81.224.143 were assigned to Wisecom Telecom Limited.

Traffic from IP addresses 203.81.230.102 & 203.81.230.102 which constitute 12 out of the total 1002 sample IPDRs are test calls made by our NOC to measure quality of service of the route.

Rest assured we are determined to resolve and rectify the identified discrepancies to the Authority's satisfaction and reaffirm our commitment to work in line with PTA policy and objectives.

- 3.2. The licensee replied the 2nd notice vide its letter dated 17th April, 2009 in the following terms:

We have already apprised the Authority vide our letters No. WTL-Q5/4-1/586 January 1, 2009 and WTL-OS/4-1/620 dated April 02, 2009 that Outbound VoIP services were being offered in accordance with PTA Clarification Regarding Launching of VoIP Services vide letter # M (T) 167-08/PTA dated 10th March, 2008. Nevertheless, the same has been terminated in accordance with the latest PTA Clarifications on use of IP Telephony Services vide letter No. MISC/IP/S&D/PTA/2008 dated October 31, 2008.

Regarding the inbound traffic data provided earlier by PTA with the Letter of Inquiry dated December 19, 2009 it is submitted that it was a routing error on our part due to which our national traffic over-flow was routed through one of our switching facilities. All this traffic which was erroneously routed through the switch was WTL own subscriber national traffic overflow which was terminated through our international interconnection trunks with CMOs and LLOs for which the APC and USF is duly accounted for in the international traffic CDRs submitted to the Authority for the month of September, October and November 2008 vide our letter No. WTL-05/4-1/620 dated April 02, 2009. Specific CDRs of this incidence were also provided to the Authority vide our letter # No. WTL-05/4-1/586 dated January 01, 2009,

After a thorough internal technical audit we have corrected the anomalies in the routing as identified in the data provided by the Authority. Still we request the Authority to kindly share with us the findings so that immediate remedial measures if further required may be taken to rectify the discrepancies up to the entire satisfaction of the Authority.

In view of the above, it is respectfully prayed that the Authority would give a lenient consideration to our submissions and Show Cause Notice # 1-6 (Vigilance) PTA/09/629 dated 20 March, 2009 may kindly be withdrawn as all necessary steps required to ensure complete rectification of the contravention in compliance with the PTA directives have been taken.

4. Evaluation of the replies to the 1st and 2nd notices:

- 4.1. A careful evaluation of the replies could not satisfy us, hence, the licensee was required to appear before us to extend it the opportunity of personal hearing.

5. Hearings by the Authority:

5.1. The matter was fixed for hearing on 30th April, 2009. The licensee attended the hearing through its representatives namely Mr. Sohail Qadir (Director Operations), Mr. Abdul Bari Rashid (Internal Counsel), Mr. Muhammad Atif Sheikh (General Manager LDI), Mr. Muhammad Noaman Adil (Director Finance & Accounts), Mr. Umar Durani (General Manager Operations), and Mr. Abu Zar (Director Software).

5.2. The licensee reiterated the same facts as stated in its replies dated 31st January, 2009, 2nd April, 2009, 17th April, 2009 and 24th April, 2009 and submitted pointwise replies to the Authority:

(i). The licensee took the stance that it has not concealed the minutes with any malafide intention on its part rather it was occurred due to Huawei switch, non-segregation of national and international trunks and some routing error and clock synchronization, etc., which was confirmed through its internal audit conducted by it on its own. It admitted that during its thorough technical analysis it revealed that there was only one operator, i.e., Telenor, where reporting error was found and the number of minutes which were less reported were 6.4 million and not 6.9 million and that these minutes have already been rectified and informed to the Authority, hence, the statement that 6.9 million minutes concealed on Mobile Networks is not correct. It further stated that it was expecting such sort of issues due to installation of Huawei switch, that is why it already sent email on 29th December, 2008 for intimating the Authority that it can reconcile the data to the satisfaction of the Authority in case of any discrepancy. It further informed that it was receiving invoices/bills from Telenor with Zero report, whereas it was paying huge amounts.

(ii). Regarding absence of 40% A-party number, it informed that it was WorldCall/licensee that contacted the Authority in 2005 because PTCL was rejecting its calls, hence, after consultation with PTCL, it was decided that “whether it is zero number or Null number, if call is terminated on international trunks, then it shall be treated as international call” and any call terminated on PTCL national trunk with NULL party shall be rejected. It further informed that it has interconnection with Telenor and there was no difference between national and international trunks. The operator identification insertion patch was not applied on these trunks as the SOP is for applying this patch on all international trunks. It processed the procedure before October, 2008 for segregation of trunks. Segregation of trunks with Telenor for national and international traffic has been completed in Lahore and Karachi and for Islamabad it is still under process.

(iii). Regarding 5 million minutes appearing in IPDRs, it stated that these 5 million minutes identified by the Authority in IPDRs could be part of the 6.59 million minutes mentioned above as it has not been able to find any additional minutes in its CDRs which were not reported to the Authority. The Authority on its request provided random sample of 1002 calls, which were mapped with its CDRs and these were 99% matching with CDRs of the licensee. It has also provided bandwidth and IP addresses to Wisecom, might be the rest calls may relate to Wisecom and not to the licensee, hence, requested for provision of total IPDRs so that calls could be mapped and discrepancies would be identified and removed accordingly. It also gave percentage of the Sample IPDRs and admitted that it made few calls for testing in UK. Furthermore, it pointed out clock

synchronization issue and the difference of 400,000 minutes is either due to clock synchronization or may relate to Wisecom.

(iv). About termination of traffic by geographic numbers it took the stance that it has already apprised the Authority vide its letter dated 1st January, 2009 that VOIP services were being offered in accordance with PTA clarification dated 10th March, 2008. However, the latest clarification dated 31st October, 2008 is being implemented in its true letter and spirit. It also submitted that inbound call service in Pakistan was restricted on this service and detailed investigation revealed that the IPDR recorded by ITMS were the result of a minor routing error because of which its national traffic over-flow was erroneously routed through one of its associated switching facilities. All this traffic of about 6000 calls which was routed through the switch is WTL own subscriber traffic flow and was terminated on its interconnect partners through its international interconnection trunks for which APC for USF is duly accounted for.

6. Findings of the Authority:

6.1. The licensee admitted less reporting in its international telephony minutes owing to new Huawei switch and reporting error in its system, which fact was also supported as alleged by the licensee through technical audit conducted by the licensee itself while defending the show cause notice, hence, it reconciled its data and rectified around 6.5 million international telephony minutes in its record leaving a difference of 374,796 minutes still undeclared by it, which were less reported earlier, but these were present in its interconnect partner's CDRs. The licensee is, therefore, liable to pay APC for USF for 6.9 million less reported minutes which were admitted as occurred due to *inter alia* the reporting error of the Huawei switch.

6.2. The licensee further claimed that the instructions of the Authority relating to A-Party number could not be observed owing to non-segregation of national and international trunks with Telenor and non-application of operator identification patch, for which it is taking steps to remove these discrepancies. It further confirmed that segregation procedures have been completed in Lahore and Karachi and for Islamabad are under process.

6.3. The argument of the licensee regarding extension of its local loop numbers beyond designated regions pursuant to clarification issued by the Authority, is based on mis-interpretation on the part of licensee. These numbers (i.e., numbering blocks and short codes) were allocated to the licensee for specific region, pursuant to condition 2.1 of the LL license, regulations 3(1) and 16 of the Numbering Regulations to be used for its Licensed Services within the Licensed Regions and shall be used in the specific purpose and manner as approved by the Authority pursuant to regulation 14(1)(b) of the Numbering Regulations, hence, these numbers cannot be extended beyond the licensed region.

6.4. As the licensee has pointed out that it has leased bandwidth and IP connectivity to M/s. Wise Communication (Pvt) Ltd and might be disputed minutes relate to Wisecom, therefore, pursuant to the instructions of the Authority further investigation was carried out by calling representatives of Wisecom and the licensee. During scrutiny/investigation it was confirmed by the representative of Wisecom that IP Pool 203.81.224.0/24 of the licensee was leased to Wise

Communication from September, 2007 uptill the end of November, 2008, therefore, during the period of July, 2008 to October, 2008 (the period mentioned in the show cause) these IP addresses were being used by Wisecom. Therefore, minutes terminated on IP addresses of aforementioned IP pool were re-calculated and minused from the total of five (05) million minutes. The licensee was also given further sample of 10,000 minutes in May, 2009 as per request of the licensee for further reconciliation. The licensee submitted that during cross check one of the IP addresses 203.81.209.229 present in the IPDR sample is not its white listed LDI IP. It is a dynamic IP address assigned by the DHCP server to its broadband customers in Karachi. Detailed comparison of the sample IPDR given by PTA was carried out with the Worldcall CDRs earlier submitted to the Authority and also with the CDRs received from Mobilink and Telenor. A cross check was also done with the National and International CDRs received from Mobilink and Telenor for the same period, and requested for a meeting to share its findings and discuss/conclude the reconciliation.

6.5. The Authority did not count the traffic terminated through the IP address 203.81.209.229. even then a difference of more than one million minutes have been detected for which it failed to give defence in its aforesaid reply. Hence, the revised difference of minutes which is still less reported is given below:

Month	Minutes
July, 2008	289,045
August, 2008	326,477
September, 2008	217,845
October, 2008	235,775
Total	1,069,142

7. Order of the Authority:

7.1. The foregoing shows that the contents of the aforesaid show cause notices stand proved and since the licensee has already rectified the concealed minutes in its reports and also apologized for its mistakes and assured that no such occurrence would happen in future, however, still more than one million minutes as referred to in Para 6.5, above, remain concealed which have been less reported.

7.2. Under sub-rule 4 of rule 9 of the Telecommunication Rules, 2000, the licensee is directed to:

- (a) remedy the contravention by paying **Rs.23,745,450/-** on account of APC for USF against aforesaid less reported minutes **8,024,100** terminated on Mobile networks and APCL to respective LL operator for less reported minutes **5,919** terminated on LL networks within **twenty (20) days** of the issuance of this "Enforcement Order".

- (b). submit a complete report to the effect of satisfactory segregation of national and international trunks at terminating ends of Access Providers clearly showing the steps taken by the licensee to avoid its recurrence in future alongwith proof of payments mentioned in Para 7.2 (a) above within the aforesaid period of **twenty (20) days** from the issuance of this “Enforcement Order”.
- 7.3. In case of the licensee’s failure to comply with Para 7.2, above, “Final Enforcement Order” under sub-rule 5 of Rule 9 of the Telecommunication Rules, 2000 shall be issued against the licensee.

(S. Nasrul Karim A. Ghaznavi)
Member (Finance)

(Dr. Khawar Siddique Khokhar)
Member (Technical)

(Dr. Mohammed Yaseen)
Chairman

Signed on 21st July, 2009 and comprises 12 pages.