

శ్రీయుత గౌరవనీయులైన సెక్రటరీ, ఆం.పు. ఎలక్ట్రిసిటీ రెగ్యులేటరీ కమిషన్, # 11-4-46, 4వ & 5వ అంతస్తులు, సింగిల్ టెక్స్ భవన్ రోడ్ హిల్స్, హైదరాబాద్ - 4 గారికి

తీర్మానం!

విషయము : బి.సీ.ఎ కేంద్రాల ద్వారా బిల్ కలెక్షన్ సర్వీసులను ఉపయోగించుకోవటానికి చెల్లన్సు శుల్క చార్జీలు రూ॥ 2/- లకు నిర్ధారించండి. అదనపుగా చార్జీలు పెంచ వలసిన అవసరం లేదు.

- x -

నా మనవి ఏమనగా నేను అనగా అయిలా చంద్రప్రకాష్ % క్రి.శి. ఎల్లయ్య, ఐ.నెం. 3-2-94, పురాణిపేట, జి.కె.ఆర్. - 505327 కేంద్రం గల బిల్లు వారంత నివాసితుడను.

J03319, J 20944, J 27211 ఎడ్యుల్ట్ వినియోగదారుడను.

Dt. 01.04.2004 నుండి E-seva కేంద్రం, జి.కె.ఆర్. నుండి బిల్లులను చెల్లించుచున్నాను.

స కాలం నే చెల్లింపు చేసినా ఆలస్యంగా చెల్లించినందుకు సర్ చార్జీ వేరున రూ॥ 2/- లేదా రూ॥ 1/- అదనంగా బిల్లులో వస్తోంది. E-seva సర్వీసులను ఫ్యాక్టి న్యాయిల్స్ వినియోగం లోకి తీసుకోని రాజాబ్ దీక అలంకార పొందుగా మిగిలినది.

1 | E-seva కేంద్రాలలో చేసే చెల్లింపులలో జాప్యం జరుగుతుందని అభిప్రాయం పుజలలో నెలకొన్నది.

E-seva కేంద్రాలలో చెల్లింపు చేసే ప్రతి ఎడ్యుల్ట్ బిల్లుకు గతంలోని మాదిరిగానే రూ॥ 2/- లుగానే నిర్ధారించండి.

2 | వీటికి అదనపు చార్జీలు చెల్లించ వలసిన అవసరం లేదు. మరియు చరిత్రాను అంశాన్ని రుజువు చేసే ఆధారముగా ఎడ్యుల్ట్ బిల్లులను అమోదించుచున్నారు. ఎడ్యుల్ట్ బిల్లులలో చరిత్రాను సుష్టంగా ముద్రించే విధంగా తగు అదేశాలు జారీ చేయవలసింది.

తేదీ: 12.11.2009 నాడు ఉ॥ 11.00 గం. లకు కోర్ట్ హాలులో నిర్వహించే సదస్సులో మీరు తీసుకునే నిర్ణయాలను లేఖ రూపకంగా తెలియ చేయవలసింది అతిస్పష్టం...



Date: 21 Oct 2009
Station: Jagtial.

కృతజ్ఞతలతో...
Aila Chanora Prakash
(AILA CHANORA PRAKASH)
H.No.3-2-94, Puranipet
JAGTIAL-505327
Dist: Karimnagar
Cell: 9490705353

Engg.		For perusal	
Tariff		Secretary	
Law	✓	Member/F	
Admn.		Member/T	
IT		Chairman	
CA			
EAS	✓		
R.O.			

Place a copy in 'esva rate enhancement' heavy file

2080
26/10/09
16/10
26/10/09

2073
27/10/09

**BEFORE THE ANDHRA PRADESH ELECTRICITY
REGULATORY COMMISSION**

* 11-4-660, 5th Floor Singareni Bhavan, Red Hills, Hyderabad –
500 004

File No
Case No

IN THE MATTER OF

Petition requesting the Commission

1. Not to allow service charge of Rs.5 per bill for collection as proposed by the Licensees.
2. Direct the Licensees to revive earlier practices that resulted in lower service charge.
3. Direct the Licensees to collect rent from e-seva centres located on its premises.
4. To allow the petitioner to be heard in person.

IN THE MATTER OF

Name and full address of the petitioner:

K. Raghu.
Certified Energy Manager & Auditor
H.No. 3-6-27/2.
Opp. Pension Office,
Near Skyline Theatre,
Basheer Bagh, Hyderabad-29

And

Name and address of the Respondents:

Chairmen and Managing Directors of
Southern Power Distribution Company of Andhra Pradesh Ltd.
Northern Power Distribution Company of Andhra Pradesh Ltd.
Central Power Distribution Company of Andhra Pradesh Ltd.
Eastern Power Distribution Company of Andhra Pradesh Ltd.



**BEFORE THE ANDHRA PRADESH ELECTRICITY REGULATORY
COMMISSION * 11-4-660, 5th Floor Singareni Bhavan, Lakdi-ka-pool,
Red Hills, Hyderabad – 500 004**

IN THE MATTER OF
Petition requesting the Commission

1. Not to allow service charge of Rs.5 per bill for collection as proposed by the Licensees.
2. Direct the Licensees to revive earlier practices that resulted in lower service charge.
3. Direct the Licensees to collect rent from e-seva centres located on its premises.
4. To allow the petitioner to be heard in person.

AFFIDAVIT VERIFYING THE MEMORANDUM OF OBJECTIONS

I, K.Raghu, Certified Energy Manager & Auditor, son of K.Murahari, H.No. 3-6-27/2, Opp. Pension Office, Near Skyline Theatre, Basheer Bagh, Hyderabad-29, do hereby solemnly affirm and state as under:

The statements made in the paragraphs of the accompanying memorandum of objections are true to my knowledge and the material gathered by me and made available to me and is based on information and advice received which I believe to be true and correct.

Solemnly affirm


Deponent

29 - 10 - 2009
Hyderabad

**BEFORE THE ANDHRA PRADESH ELECTRICITY REGULATORY
COMMISSION * 11-4-660, 5th Floor Singareni Bhavan, Lakdi-ka-pool,
Red Hills, Hyderabad – 500 004**

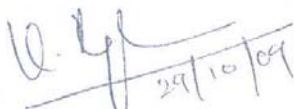
1. The following submissions are in response to the Public Notice dated 13-10-2009 in O.P. No.38 Of 2009, related to service charges to be paid to e-seva centres.
2. One of the aims of the regulatory process is to see that the sector functions in an economic and efficient manner. This should apply to the present application of the DISCOMs in the state to allow them to pay higher bill collection charges. The proposed bill collection charges are more than double the existing charges.
3. Here it is to be noted that the DISCOMs are, though owned by the state government 100%, in keeping with the reform process are expected to work independently and commercially efficient manner. The present application of the DISCOMs seeks APERC's permission to follow the GoAP's Order Rt. No. 205, dated 30.06.2009. Two years back DISCOMs came with the proposals to levy Rs. 2 per bill as collection charges, and within two years they seek to hike it by more than 100%. No reason other than it being a GO by GoAP is being adduced as reasons for hike in the collection charges. That too the GO is issued by the Information Technology and Communications Department but not the Energy Department of GoAP. The above G.O. amounts to interference in normal functioning of the DISCOMs. It is not an encouraging sign.
4. The present petition is about adopting Rs.5 as service charge to be paid to the e-seva centres for bill collection. We consider that this is very uneconomical to the DISCOMs. We are of the opinion that cheaper and least cost options exist. Contract persons collected bills from the customers at the latter's doorstep with a service charge of just Rs.0.75. Some organisations collected bills with a service charge of Re.1. When such cheaper alternatives existed Rs.5 as proposed by the DISCOMs appears to be high. The e-seva must have recovered all their establishment costs through the exorbitant service charge that it has collected until now, and as a result they must be in a position to offer service at a lesser cost.
5. It is to be noted that in the past all the bill collections were not done by the utility personnel alone but also by private individuals and other organisations like Loins Clubs. In the background of this exorbitant hike in collection charges DISCOMs can explore other cheaper alternatives that already exist as well as revive its cash counters which were cheaper than e-seva service. In this context we request the DISCOMs to provide us information on different agencies/organisations engaged by the DISCOMs in bill collection, total number of customers served by each agency and cost per bill collection paid to these agencies.

6. In the year 2007 during the course of its submissions to hike e-seva collection charges to Rs 2 per bill APNPDCL and APSPDCL in their petitions stated, "The licensee is of the view that the service charge of Rs.2/- per service offered by the Commissioner, e-seva for collection of electricity bills is reasonable as any fresh arrangement at this juncture by the licensee i.e., recruitment of additional revenue cashiers or appointing private enterprises with necessary software infrastructure may also amount to similar cost per transaction". There is no evidence at present to show that the costs have increased by more than 100% to warrant hike in e-seva collection charges.

7. As many e-seva centres are located on DISCOM premises we request the Commission to direct the DISCOMs to collect rent from these centres.

Prayer requesting the Commission:

1. Not to allow service charge of Rs.5 per bill for collection as proposed by the Licensees.
2. Direct the Licensees to revive earlier practices that resulted in lower service charge.
3. Direct the Licensees to collect rent from e-seva centres located on its premises.
4. To allow the petitioner to be heard in person.


29/10/09

K.Raghu
Certified Energy Manager and Auditor



United Telecoms Limited

6-3-649/5, 2nd Floor, Chakkilam House,
Somajiguda, Hyderabad - 500 082.
☎ : 040 - 66668777, 66669777 Fax : 040-23327903
E-mail : utlhyd@utlindia.com



The Secretary,
Andhra Pradesh Electricity Regulatory Commission,
11-4-66, 4th and 5th Floors,
Singareni Bhavan,
Red Hills,
Hyderabad-500 004



30 Oct., 2009

Dear Sir,

Sub: Comments/ Suggestions on the Petition by AP DISCOMS, regarding charges payable for Services availed through eSeva.
Ref: O.P. No. 38/2009

We, United Telecoms Limited (UTL), had entered into an Agreement with eSeva, Government of Andhra Pradesh, in May, 2003, to establish and operate district wise Data Centres and eSeva Centres in Zone 2, comprising of 23 Municipalities in East Godavari, West Godavari and Krishna Districts, for providing Government to Citizen, Government to Business and Business to Citizen Services through these Centres on common window basis.

The services which we have been providing through these centres all these years include, among others, Collection of Electricity Bills for APSPDCL and APEPDCL. We have been rendering these services to the consumers of APSPDCL and APEPDCL with hitherto unknown levels of comfort and convenience. Both the Consumers and the DISCOMS have been very happy with our services, which apart from providing the citizen convenience have also been ensuring that the revenue is realized by the DISCOMS in the quickest possible time even while improving the revenue recovery, thanks to the possibility of instant generation of D-List of defaulters at the end of the bill payment cycle.

Though we do not have any direct agreement with the DISCOMS for payment of Services Charges for the services rendered by us, their Petition and the issues raised therein have a far reaching impact on our very sustenance. We therefore wish to submit the following facts for your kind and sympathetic consideration:

1. Services for DISCOMS were possible to be introduced through urban eSeva Centres only because of DISCOMS' active participation in eSeva, which started as a revolution in 2001. DISCOMS computerized their processes, created the database of their consumers, installed and commissioned servers provided access




Corp. Office : 18A/19, Doddanekundi Industrial Area, II-Phase, Mahadevapura Post, Bangalore - 560 048
Ph: 080-2852 4050 / 2852 4030 / 2852 4032 Fax: 080-2852 4032

- to the eSeva Data Centres and helped eSeva customize and integrate their application with that of DISCOMS.
2. Until 1 April, 2007, DISCOMS had been paying Rs. 5 for every Electricity Bill Transaction, to the eSeva, independent of the amount payable to us by eSeva for such a transaction.
 3. For reasons which are not very well understood by us, this rate of Rs. 5 per transaction, at which payments were being made by DISCOMS to the eSeva until 31 March, 2007, was reduced to Rs. 2 per transaction, effective from 1 April, 2007.
 4. While it was so, eSeva, unilaterally and without any justification whatsoever, decided to reduce the service charges payable to us for Electricity Bill Services, to Rs. 2 per transaction, effective from 1 April, 2007. This was in total contravention of the Agreement between us and eSeva. This made the project sick necessitating pumping in of borrowed resources to maintain the operations, which we cannot do any further.
 5. It does not really matter to us whether the money to be paid to us contractually by eSeva, comes from the DISCOMS or from the Government or from both together, or for that matter, even if it comes from the recipients of the services. But it is imperative that the right price for the services rendered, as determined through a competitive bidding process, is paid to the service providers like us, so that the activity and the Paradigm Shift eSeva has come to represent in the realm of Citizen Services in the State, are sustained for posterity.
 6. We wish to be present during the hearing of the subject Petition in the APERC Court Hall on 12 Nov., 2009, to furnish any other clarifications, as may be required, in the matter.

Given the above, we pray that suitable orders, as deemed appropriate by your kind authority, may be passed.

Thanking you,

Yours faithfully,
for United Telecoms Limited,


PVL Narasimham
DGM





VESTAL

Mobile : 98851 99548
e-mail: vestalorg@hotmail.com

Vengamamba Embold, Sentient, Talented and Advanced Ladder

Non-Governmental Organisation Registered under the Societies Registration Act XXI of 1860

Regd. Office : H. No: 7-11-27, Kakumanuvari Thota, Arundelpet (P.O.) GUNTUR - 522 002. A.P.
B.O.: Near Sri Yellamma Satram, Narawada (V) Duthaluru (M), SPS Nellore Dist. A.P.

P. NARASIMHULU
Chief Functionary

Guntur,

BEFORE THE ANDHRA PRADESH ELECTRICITY REGULATORY COMMISSION
11-4-66, 4th & 5th Floors, Singareni Bhavan, Red Hills, Hyderabad-4.

O.P. No. 38/2009

In the matter of
Four Distribution Companies filing an application to the Hon'ble A.P Electricity
Regulatory Commission for allowing to pay Rs.2-00 and bear the remaining amount by
State Govt. as subsidy for utilizing the services of e-seva for collection of electricity
charges and consequently inviting for objections/suggestions from the general public vide
Enadu advertisement dated 14-10-2009, I hereby state as follows.

I, PULIVARTHI NARASIMHULU, Chief Functionary of Vengamamba Embold,
Sentient, Talented and Advanced Ladder (VESTAL) residing at D.No. 7-11-27,
Kakumanuvarithota, Arundelpet, Guntur-522002 on behalf of our organization file the
following objections/suggestions .

Name and address of the Objector:
Pulivarthi Narasimhulu
Chief Functionary,
VESTAL,
D.No. 7-11-27, Kakumanuvarithota,
Arundelpet P.O.,
GUNTUR-522002.
e.mail: vestalorg@hotmail.com

Name and address of the Respondents:
Chairman and Managing Director,
APCPDCL, APEPDCL, APNPDCL and APSPDCL.




Cont....2

AFFIDAVIT

I, Pulivarthi Narasimhulu S/o Late Malakondaiah, aged 60 years, Chief Functionary, VESTAL, working without any remuneration for above social service organization and residing at D.No. 7-11-27, Kakumanuvarithota, Arudelpet P.O., Guntur-522002 do hereby solemnly affirm that the following objections/suggestions filed by me on behalf of our organization on the e-seva charges payable by four DISCOMS filed before the Hon'ble APERC are based on information gathered by me and our organization and are true to the best of our knowledge.

Yours faithfully,


(PULIVARTHI NARASIMHULU)
Dated: 27-10-2009,
Place: Guntur.

Cont....3

BEFORE THE ANDHRA PRADESH ELECTRICITY REGULATORY COMMISSION
11-4-66, 4th & 5th Floors, Singareni Bhavan, Red Hills, Hyderabad-4.

O.P No. 38/2009.

In the matter of
Four Distribution Companies filing an application to the Hon'ble A.P. Electricity
Regulatory Commission for allowing them to pay @ Rs.2-00 only and to bear the
remaining amount by State Govt. as subsidy for utilizing the services of e-seva for
collection of electricity bills and consequently inviting for objections/suggestions from
the general public vide Eenadu advertisement dated 14-10-2009, I hereby state as
follows:

I, Pulivarthi Narasimhulu, Chief Functionary, VESTAL, residing at D.No.7-11-27,
Kakumanavarithota, Arudelpet, Guntur-522002 on behalf of our organization file the
following objections/suggestions: ~

1. Why should Govt. of A.P bear the balance amount of e-seva charges?

The Govt. of A.P provided building and other infrastructural facilities to each of the
e-seva centres across the state by incurring crores of rupees expenditure. At present the
State Govt. is paying Rs.2-50 per transaction in addition to Rs.2-00 which was being paid
by the DISCOMS and also reimbursing the cost of salaries of the personnel working in
the e-seva centres. The only expenditure that is borne by the Service
Providers(contractors) is the broad band charges and electricity charges of the centre.
There are more than 2 crore connections in the state and most of the consumers of these
connections pay their bills in e-seva centres. If the remaining amount of Rs.3-00 plus
Service tax on Rs.5-00 which will be nearly Rs.1-00 i.e., total of Rs.4-00 per transaction
on one crore above connections will burden the Government Rs. 4 crore per month in
addition to the present expenditure @ Rs.2-50 per transaction and the wages to the
personnel working in e-seva centres. As the Govt. is facing financial crisis due to
implementation of many welfare schemes and not in a position to take up developmental
activities, it will be an additional burden to the Govt. if the request of the DISCOMS are
accepted. Hence the request of the DISCOMS is not justifiable and not acceptable.

Cont..4

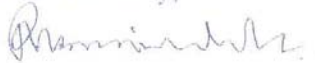
2. Why should the DISCOMS bear the enhanced amount of e-seva charges?

Collection of electricity bills through e-seva centres is advantageous to the Petitioners as the consolidated amount collected by e-seva is paid to the Petitioners without any risk such as maintenance of registers, verification and reconciliation of accounts. The cost of collection of electricity bills will be less than the cost required to be incurred by the Petitioners for such collection if the Petitioners engage their staff even though the revised rates are paid. Moreover there is no pilferage and malpractice etc., in the service rendered by e-seva.

As per the orders passed by APERC on 18-09-2007, the DISCOMS are permitted to pay @ Rs.2-00 per transaction by accepting the recommendations of the Director (Engg) and the Petitioners must ensure that a price-discovery procedure is evolved and also encourage banks / other agencies to provide bill collection services, if these are found to be less expensive and more efficient than the e-seva centres. But it seems that the DISCOMS have not complied with. As the Petitioners have not complied with the orders of the APERC issued on 18-09-2007, it has to born the additional burden ordered by the Govt. of A.P.

It is therefore prayed that the Hon'ble Commission consider the above objections and pleased to direct the four DISCOMS to pay the enhanced rate to the e-seva as it will burden the Govt. of A.P if orders are given to bear the additional expenditure by Govt. and direct the Petitioners to search for alternative agencies which provide less rate than e-seva at least for the next enhancement of charges by e-seva..

Yours faithfully,



(PULIVARTHI NARASIMHULU)

Date: 27-10-2009,

Place: Guntur.

**BEFORE THE ANDHRA PRADESH ELECTRICITY
REGULATORY COMMISSION**

* 11-4-660, 5th Floor Singareni Bhavan, Red Hills, Hyderabad –
500 004

File No
Case No

IN THE MATTER OF

Petition requesting the Commission

1. Not to allow service charge of Rs.5 per bill for collection as proposed by the Licensees.
2. Direct the Licensees to revive earlier practices that resulted in lower service charge.
3. Direct the Licensees to collect rent from e-seva centres located on its premises.
4. Allow the petitioner to be heard in person.

IN THE MATTER OF

Name and full address of the petitioner:

People's Monitoring Group on Electricity Regulation
C/o Centre for Environment Concerns
3-4-142/6, Barkatpura
Hyderabad - 27

Represented by

M.Thimma Reddy
Convenor
People's Monitoring Group on Electricity Regulation
C/o Centre for Environment Concerns
3-4-142/6, Barkatpura
Hyderabad - 27

And

Name and address of the Respondents:

Chairmen and Managing Directors of
Southern Power Distribution Company of Andhra Pradesh Ltd.
Northern Power Distribution Company of Andhra Pradesh Ltd.
Central Power Distribution Company of Andhra Pradesh Ltd.
Eastern Power Distribution Company of Andhra Pradesh Ltd.



**BEFORE THE ANDHRA PRADESH ELECTRICITY REGULATORY
COMMISSION * 11-4-660, 5th Floor Singareni Bhavan, Lakdi-ka-pool,
Red Hills, Hyderabad – 500 004**

IN THE MATTER OF

Petition requesting the Commission

1. Not to allow service charge of Rs.5 per bill for collection as proposed by the Licensees.
2. Direct the Licensees to revive earlier practices that resulted in lower service charge.
3. Direct the Licensees to collect rent from e-seva centres located on its premises.
4. Allow the petitioner to be heard in person.

AFFIDAVIT VERIFYING THE MEMORANDUM OF OBJECTIONS

I, M. Thimma Reddy, son of late M.Pothi Reddy, working for Prayas Energy Group, C/o the Centre for Environment Concerns, 3-4-142/6 Barkatpura, Hyderabad – 27, do hereby solemnly affirm and state as under:

1. I am the Convenor of the People's Monitoring Group on Electricity Regulation (PMGER), the applicant in the above matter and am duly authorised by the said applicant to make this memorandum of objections on its behalf.
2. The statements made in the paragraphs of the accompanying memorandum of objections now shown to me are true to my knowledge, derived from the material gathered by PMGER and made available to me and are based on information and advice received which I believe to be true and correct.

Solemnly affirm

M. Thimma Reddy

Deponent

29 – 10 – 2009
Hyderabad

**BEFORE THE ANDHRA PRADESH ELECTRICITY REGULATORY
COMMISSION * 11-4-660, 5th Floor Singareni Bhavan, Lakdi-ka-pool,
Red Hills, Hyderabad – 500 004**

1. The following submissions are in response to the Public Notice dated 13-10-2009 in O.P. No.38 of 2009, related to service charges to be paid to e-seva centres.
2. One of the aims of the regulatory process is to see that the sector functions in an economic and efficient manner. This should apply to the present application of the DISCOMs in the state to allow them to pay higher bill collection charges. The proposed bill collection charges are more than double the existing charges.
3. Here it is to be noted that the DISCOMs are, though owned by the state government 100%, in keeping with the reform process are expected to work independently and commercially efficient manner. The present application of the DISCOMs seeks APERC's permission to follow the GoAP's Order Rt. No. 205, dated 30.06.2009. Two years back DISCOMs came with the proposals to levy Rs. 2 per bill as collection charges, and within two years they seek to hike it by more than 100%. No reason other than it being a GO by GoAP is being adduced as reasons for hike in the collection charges. That too the GO is issued by the Information Technology and Communications Department but not the Energy Department of GoAP. The above G.O. amounts to interference in normal functioning of the DISCOMs. It is not an encouraging sign.
4. The present petition is about adopting Rs.5 as service charge to be paid to the e-seva centres for bill collection. We consider that this is very uneconomical to the DISCOMs. We are of the opinion that cheaper and least cost options exist. Contract persons collected bills from the customers at the latter's doorstep with a service charge of just Rs.0.75. Some organisations collected bills with a service charge of Re.1. When such cheaper alternatives existed Rs.5 as proposed by the DISCOMs appears to be high. The e-seva must have recovered all their establishment costs through the exorbitant service charge that it has collected until now, and as a result they must be in a position to offer service at a lesser cost.
5. It is to be noted that in the past all the bill collections were not done by the utility personnel alone but also by private individuals and other organisations like Loins Clubs. In the background of this exorbitant hike in collection charges DISCOMs can explore other cheaper alternatives that already exist as well as revive its cash counters which were cheaper than e-seva service. In this context we request the DISCOMs to provide us information on different agencies/organisations engaged by the DISCOMs in bill collection, total number of customers served by each agency and cost per bill collection paid to these agencies.

6. In the year 2007 during the course of its submissions to hike e-seva collection charges to Rs 2 per bill APNPDCL and APSPDCL in their petitions stated, "The licensee is of the view that the service charge of Rs.2/- per service offered by the Commissioner, e-seva for collection of electricity bills is reasonable as any fresh arrangement at this juncture by the licensee i.e., recruitment of additional revenue cashiers or appointing private enterprises with necessary software infrastructure may also amount to similar cost per transaction". There is no evidence at present to show that the costs have increased by more than 100% to warrant hike in e-seva collection charges.

7. The application seeks a policy direction from APERC to the GoAP to pay the balance amount. In stead the GoAP on its own can come forward to fill the gap. DISCOMs themselves can seek additional funding from the state government in case they decide to continue to use e-seva services. This does not call for a policy direction from the Commission.

8. As many e-seva centres are located on DISCOM premises we request the Commission to direct the DISCOMs to collect rent from these centres.

Prayer requesting the Commission:

1. Not to allow service charge of Rs.5 per bill for collection as proposed by the Licensees.
2. Direct the Licensees to revive earlier practices that resulted in lower service charge.
3. Direct the Licensees to collect rent from e-seva centres located on its premises.

M. Thirumala