

*(Unofficial Translation)<sup>1</sup>*

**Nepal Telecommunications Authority**

**Decision made by**

1. Chairperson Prof. Dr. Dinesh Kumar Sharma
2. Member Mahesh Prasad Adhikari
3. Member Balaram Pradhanang
4. Member Bheshraj Kandel
5. Member Tulasi Bhatta

Date of petition registration: 2063.12.26 (9 April 2007)	
Petition registration number: 11	
Suman Chhetri, authorized on behalf of Web Server Communication Pvt. Ltd., having its registered office at Ward No. 10, Kathmandu Municipal Corporation, Kathmandu District-----1	Petitioner
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu --1	Respondent
Date of petition registration: 2063.12.26 (9 April 2007)	
Petition registration number: 12	
Mr. Surendra Shakya, authorized on behalf of Infocom Pvt. Ltd., having its registered office at Ward No. 10, Kathmandu Municipal Corporation, Kathmandu District---1	Petitioner
Versus	

<sup>1</sup> This is an unofficial translation version of the Judgments. If any idea or portion of this document is disputed the original Nepali version will prevail.

Nepal Doorsanchar Company Limited, Central Office, Kathmandu -1	Respondent
Date of petition registration: 2063.12.26 (9 April 2007)	
Petition registration number: 13	
Mr. Laxman Yadav, authorized on behalf of WorldLink Communication Pvt. Ltd., having its registered office at Ward No. 5, Lalitpur Sub-municipal Corporation, Lalitpur District--1	Petitioner
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu --1	Respondent
Date of petition registration: 2063.12.26 (9 April 2007)	
Petition registration number: 14	
Mr. Madhu Kumar Amatya, authorized on behalf of Mercantile Communication Pvt. Ltd., having its registered office at Ward No. 1, Kathmandu Municipal Corporation, Kathmandu District-----1	Petitioner
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu -1	Respondent
Date of petition registration: 2063.12.26 (9 April 2007)	
Petition registration number: 15	
Mr. Girish Giri, authorized on behalf of Netoples Rechnology Pvt. Ltd., having its registered office at Ward No. 29, Lalitpur Sub-municipal Corporation, Lalitpur District-----1	Petitioner
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu -1	Respondent
Date of petition registration: 2063.12.27 (9 April 2007)	
Petition registration number: 16	
Mr. Sudhir Kumar Paudel, authorized on behalf of Vianet Communication Pvt. Ltd., having its registered office at Ward No. 3,	Petitioner

Lalitpur Sub-municipal Corporation, Lalitpur Distric--1	
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu -1	Respondent
Date of petition registration: 2063.12.27 (9 April 2007) Petition registration number: 17	
Mr. Mahendra Kumar Subedi, authorized on behalf of Everest Net Pvt. Ltd., having its registered office at Ward No. 4, Lalitpur Sub-municipal Corporation, Lalitpur District-----1	Petitioner
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu -1	Respondent
Date of petition registration: 2063.12.27 (9 April 2007) Petition registration number: 18	
Mr. Bijaya Karanjit, authorized on behalf of Communication and Communication Pvt. Ltd., having its registered office at Ward No. 30, Kathmandu Municipal Corporation, Kathmandu District-----1	Petitioner
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu -1	Respondent
Date of petition registration: 2063.12.27 (9 April 2007) Petition registration number: 19	
Mr. Bishnu Ghimire, authorized on behalf of Broadlink Network and Communication Pvt. Ltd., having its registered office at Ward No. 10, Kathmandu Municipal Corporation, Kathmandu District--1	Petitioner
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu -1	Respondent
Date of petition registration: 2063.12.29 (11 April 2007) Petition registration number: 20	
Mr. Ek Raj Sedhai, authorized on behalf of Radius Communication	

Pvt. Ltd., having its registered office at Ward No. 31, Kathmandu Municipal Corporation, Kathmandu District-----1	Petitioner
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu -1	Respondent
Date of petition registration: 2063.12.30 (12 April 2007) Petition registration number: 21	
Mr. Mingmar Tamang, authorized on behalf of Himal Technologies Pvt. Ltd., having its registered office at Ward No. 8, Kathmandu Municipal Corporation, Kathmandu District-----1	Petitioner
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu -1	Respondent
Date of petition registration: 2063.12.30 (12 April 2007) Petition registration number: 22	
Mr. Mahesh Ratna Tuladhar, authorized on behalf of Global Internet Services Pvt. Ltd., having its registered office at Ward No. 83, Lalitpur Sub-municipal Corporation, Kathmandu District-----1	Petitioner
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu -1	Respondent
Date of petition registration: 2064.1.9 (22 April 2007) Petition registration number: 23	
Mr. Manish Kumar Singh, authorized on behalf of Himalayan Online Service Pvt. Ltd., having its registered office at Ward No. 29, Kathmandu Municipal Corporation, Kathmandu District-----1	Petitioner
Versus	
Nepal Doorsanchar Company Limited, Central Office, Kathmandu -1	Respondent

**Subject: Petition for equal treatment.**

A brief description of the facts contained in the instant petition filed pursuant to Section 16 of the Telecommunications Act, 2053 (1997) and Rules 22 and 24 of the Telecommunication Rules, 2054 (1997) is as follows:

The petition reads that the petitioner has obtained the internet service license and been providing the service. For the purposes of the petition, the petitioner, as a customer of the Telecommunication Company, has petitioned for the settlement of dispute pursuant to Rules 22 and 24 of the Telecommunication Rules, 2054 (1997). The respondent Nepal Doorsanchar Company Limited (NDCL) is a service provider operating the services set forth in Schedule-6A. of the Telecommunications Rules. Since the respondent NDCL has provided for charging to customers of its own internet service a tariff equal to local calls even for dialing across the nation, the petitioner, too, being a customer of the NDCL, should have been accorded such facility accordingly, but the NDCL has done different treatment to it, and while doing so, the NDCL has contravened Section 42(3) of the Telecommunications Act, petition has been filed praying for the settlement of dispute pursuant to Sections 16 and 47 of the said Act and Rules 22 and 24 of the Telecommunications Rules, 2054(1997) and for the equal treatment in respect of Code Division Multiple Access(CDMA), Digital Subscriber Line and Local Dialing.

An order issued on 2063.12.27 (10 April 2007) required to assign the days for the presence of the petitioner pursuant to bye-law 4(2) of the Nepal Telecommunications Authority Procedural Bye-laws, 2059 (2002), issue the 15-day notice to the respondent NDCL pursuant to bye-law 8 (3) of the said Bye-laws and submit the petition for action after the submission of a statement of defense in writing within the time limit or after the expiry of the time limit for written defense.

The statement of defense in writing submitted by NDCL reads that the petitioner's claim for taking action pursuant to Sections 16 and 47 of the Telecommunications Act, and Rules 22 and 24 of the Telecommunications Rules, 2054(1997) for an act contravening the Telecommunications Act is not a legal provision in relation to the settlement of dispute referred to in Section 42(2) of the Act. In spite of making a claim that there was a discriminatory treatment, the petitioner is not able to set out what discrimination has been made and loss and damage caused to the petitioner. The petitioner's plea for a facility equal to that accorded to internet customers of the NDCL in view of the fact that the petitioner itself is an internet service operator is not lawful, and objectively, the petition is not based on any truth, so it should be dismissed.

An order was issued on 2064.3.18(2 July 2007) requiring the NDCL to make presence through its officer or representative with authority to make compromise, among others, on behalf of the NDCL

in view of the fact that it had informed that any learned law practitioner as well as any attorney who could appear on behalf of the NDCL for the settlement of dispute through mutual discussions pursuant to Rule 24 (1) of the Telecommunications Rules, 2054(1997) was not competent to make compromise on behalf of the company.

An order was issued on 2064.7.28(14 November 2007) requiring the NDCL to submit details, accompanied by documentary evidence, substantiating the terms and rate imposed and charged by the NDCL while providing telephone lines (CDMA, Asymmetric Digital Subscriber Line (ADSL), Public Switched Telephone Network (PSTN) vis-à-vis internet service operated by the New Service Directorate of the NDCL.

A petition filed by the Internet Service Providers Association of Nepal (ISPAN) on 2064.9.16(31 December 2007) prays that an order should be issued, requiring the NDCL to refrain from operation ADSL service in a discriminatory manner pending the settlement of the instant petition filed by the petitioner, et al, in view of the fact the NDCL had prepared for the operation of Asymmetric Digital Subscriber Line (ASDL) in such a situation where the petition was under consideration.

In the course of taking action in respect of the said petition, an order issued on 2064.9.25(9 January 2008) required to make presence, accompanied by necessary documents and evidences, responding to what had happened in relation to the petitioner's claim and whether the order as sought by the petitioner should be issued or not.

A letter submitted by the NDCL on 2064.10.13(27 January 2008) in relation to the order issued by the Authority in the name of the NDCL on 2064.7.28(14 November 2007) prays for the issuance of an order vacating the order requiring the submission of details in view of the fact that despite that all services including CDMA, PSTN, Global System for Mobile Communications (GSM) and Internet offered by the NDCL have been operated under separate license, all services are the organs of the same company NDCL, and there is no substantial meaning of the matter as to what terms and rates have been imposed by one organ.

Pleadings made by learned advocate Mr. Satish Krishna Kharel having appeared for the petitioner, and by learned advocates Mr. Ram Kumar K.C., Mr. Suraj Adhikari, Mr. Uttam Shrestha and Advocate Amita Dixit having appeared for the NDCL have also been heard.

Upon studying the instant petition, written responses filed in the Authority and also upon hearing the pleadings made by learned law practitioners, while considering towards decision, it appears that the petitioners submit that the NDCL has provided that a client from any part of the country dialing up for the internet service offered through land line or CDMA is provided the facility of being charged

only local call rates and not being subjected to trunk charges. But the customers of other internet service providing companies like NDCL are subjected to trunk charges while dialing up for the use of internet through the medium including the basic telephone and CDMA. The NDCL has thus made a discriminatory treatment in contravention of the provisions of Section 42(3) of the Telecommunications Act 2053(1997). The petitioners therefore pray that such discrimination should be discontinued immediately making available all such services and facilities to the petitioners as are available to the NDCL's own service providers. In pursuant of the order of the Authority dated 2064.3.18(2 July 2007), the deadline of 2064.5.23(9 September 2007) has been fixed for reaching understanding between both parties after holding discussions between representatives consisting of three representatives from each of NDCL, and the petitioners(13 organizations). Nonetheless, understanding could not be reached. The letter submitted by the NDCL on 2064.10.27(10 February 2008) states, *inter alia*, that a maximum of four E-1s could be installed into the 1000 line capacity Remote Subscriber Unit (RSU) of the NDCL, and only five percent of the Total Channel Capacity pooled between RSU and Host Exchange could be offered to ISPs as every connection occupies a channel and separation of circuits for internet services through 120 channels available for 1000 lines to reduce adverse effect on voice traffic is needed. Whereas it counts 4 minutes and eight minutes for a call when a customer makes access to internet through Public Switched Telephone Network (PSTN) with 15xxx code and CDMA through dialing up #777, respectively, and it would be administered under the company policy decision whether it would be necessary for the company to provide the ADSL services in wholesale to the ISPs, allowing them to retail among their customers, like the NDCL. Moreover, the NDCL also put forward an argument, in relation to that the customers of internet operated by the NDCL are not subjected to trunk charges, that since the number of customers of the NDCL is significantly lower than that of private companies, it is not technically possible to make provision of dialing like a local call from any place of the country for internet customers, through the existing voice circuit.

The Telecommunications Act, 2053(1997) has been promulgated with a view to managing telecommunications market through competition from the private sector, founded on the results of economic liberalization policy adopted in Nepal. There is no doubt that the Government has, in pursuance of the Act, established the Nepal Telecommunications Authority as a statutory body in order to make the telecommunications services more reliable and widely accessible, to engage the private sector in the telecommunications services and to regulate and manage the same. The Act confers on the Authority various powers, which include the powers to issue license, determine quality, benchmark the service standard, approve tariffs, monitor and inspect service, make

coordination and manage for a healthy competition between and among telecommunications services and facilities and persons in it, develop and extend telecommunications services, safeguard the interests of the consumers, and quasi-judicial powers to settle disputes related to telecommunications services between the licensees and between the licensee and customers. The dispute in question, therefore, attracts Rules 22 and 24 of the Telecommunications Rules, 2054(1997), and is thus found to be under jurisdiction of the Authority.

Since two decades ago, most of the countries across the globe have been indulged in reducing and waiving their ownership in state owned telecommunications services and they have been able to create an encouraging atmosphere for private sector investment and invite foreign investment. Examples can be drawn from more than 100 countries where telecommunications services have been developed and extended by setting up independent regulatory bodies like the Authority for the purpose of creating an atmosphere for private sector investment. In order to strengthen competition, these bodies have been found engaged in evaluating market conditions on availability of service, overseeing the services being operated by dominant service provider particularly Incumbent Service Provider, making in-depth studies to ensure the non-existence of discrimination in the distribution of infrastructures developed to operate services of the Incumbent and, maintaining close vigilance over the policy adopted by service providers focusing on subsidy and predatory pricing of a service provider operating multi-telecommunications services and controlling anti-competition activities as such by acting on discouraging and punishable measures as needed. As an instance, the European Commission fined an amount of € 10.3 million against Wanadoo Company, an internet service provider (operated under full ownership of France Telecom), for providing services in a predatory pricing and causing loss to other competitors. (<http://news.bbc.co.uk/1/hi/business/3070925.stm>)

By virtue of the order of this Authority dated 2064.7.28(14 November 2007), the NDCL was required to submit details, accompanied by documentary evidence, substantiating the terms and rate imposed and charged by the NDCL while providing telephone lines (CDMA, Asymmetric Digital Subscriber Line (ADSL), Public Switched Telephone Network (PSTN) vis-à-vis internet service operated by the New Service Directorate of the NDCL. Vide its letter, bearing reference Bya. Ba. Bi. 2064/065 dispatch number 803 dated 2064.10.13(27 January 2008), the NDCL submitted its response and plea that in spite of all services including CDMA, PSTN, Global System for Mobile Communications (GSM) and Internet offered by the NDCL being operated under separate license, all services are the organs of the same company NDCL, and there is no substantial meaning of the matter as to what terms and rates have been imposed by one organ. In this context, there is no dispute that NDCL is a person with legal identity. If the respondent's statement that the company has

obtained different licenses for different telecommunications services and no agreement is necessary for the provision of facility provided by it in relation to one service operated under one license to another service operated under other license is to be considered correct, the objective of the regulatory body, in particular, to enhance competition and make services widely accessible would be affected indirectly. Section 42(3) of the Telecommunications Act provides that one shall not make discrimination unduly nor shall give undue priority to oneself or any other person or cause undue loss to any person in relation to the fees and other terms of the telecommunications service to be provided by one. It is thus clear from this provision that one is prohibited from giving undue priority to oneself, as well, in relation to the fees and terms of the service operated by the same person. A study of the terms of the license issued by the Authority to the NDCL shows that terms restraining anti-competitive activities are contained in clauses (q), (r) and (s) of section 15 of Basic-01 of the license and that one has to allow the installation of network as provided in clause (m) of section 15 of the terms. Similarly, terms 15.11 and 15.14(2) of the license of internet/email issued to the NDCL provide the term of lodgment of statements on fair trade and incomes and expenses thereof to the Authority. The Authority has issued separate licenses to the NDCL in relation to the basic telecommunications service, mobile telecommunications service and internet/email service. There exists a situation that essential facilities such as E-1 link required for internet have been provided to the petitioners through the PSTN under the basic license and to the Internet Unit operated by its New Service Directorate (Internet Unit) and Private ISPs have also used Radio Link and VSAT technologies. The Authority has issued the internet license to the NDCL under the same legal procedures as applied to the petitioner ISPs.

Section 31 of the Telecommunications Act, 2053(1997) has ensured all licensed service providers the right to mutually connect the telecommunications system developed by them with the telecommunications system developed by other licensees and use the same. The Telecommunications Act defines a telecommunications system as an instrument used or to be used in exchanging voice/data. It is beyond imagination that competition would exist without the absence of market monopoly and without the presence of more than one service provider. As far as telecommunications is concerned, besides competition, if the Incumbent Service Provider denies to avail its means and resources to other competitors at a fair price, or, if the Dominant Service Provider refuses to share resources, it results in a slow pace of development as it will take a longer time for the new comers to develop a network of their own or a web of infrastructures throughout the country, the investment will go in vein as double investment will be required to develop the sector when single and existing investment would have been enough, and because tariffs levied to the costumers are determined in

accordance with the amount invested, it will result in the services and facilities being costly. Moreover, incorporation of Sections 31 and 42(3) in the Act reflects the legislature's special focus on the concept of sharing of existing infrastructure as adopted and implemented in developed countries, as a means to ease possible obstruction in competition. The Authority has a duty to ensure that such activities do not result in a negative impact on the telecommunications sector and on the consumers. Similarly, the provision restraining an incumbent service provider from denying other service providers access to essential facilities contained in its network, while obliging the recipients to pay fees and tariffs for the facilities thus enjoyed, and also obliging the service providers to make such facilities available to themselves and to others on an equal basis is contained in Section 2 (2)(a) of the Telecommunications Regulation Reference Paper (TRRP) by the World Trade Organization (WTO), as given hereunder:

**2.2 Interconnection to be ensured:** Interconnection with a major supplier will be ensured at any technically feasible point in the network. Such interconnection is provided,

(a) under non-discriminatory terms, conditions (including technical standards and specifications) and rates and of a quality no less favorable than that provided for its own like services or for like services of non-affiliated service suppliers or for its subsidiaries or other affiliates;"

There is no doubt that NDCL is included within the definition of a Major Supplier as provided by WTO TRRP. In a situation where a person operating PSTN (land line) network under the basic telecommunications services license and mobile telecommunications network under the mobile telecommunications license allows interconnection between PSTN network under the basic telecommunications services license and the mobile telecommunications network, allowing use of all infrastructures necessary for traffic incoming and outgoing free of cost, denial of or imposing of various conditions and fees upon similar interconnection demand by other person will constitute a discrimination against new entrant and competitor and will result in inequality in competition between and among service providers of similar nature. In order to prevent such activities of inequality in competition, and to carry out tasks including maintaining balance in competition through justifiable distribution of essential facilities, regulatory bodies like the Authority are found to have been established.

A practice or trend also being followed in other countries is that a regulatory body empowered to monitor on matters such as cross subsidy, predatory pricing and distribution of services and allocation of resources in a non-transparent manner watches such activities and prevent them on occasions, impose fines and various services are operated by the same institution, and issues order to operate separate units if any condition or situation envisaged in Section 42(3) is found. In order to meet the regulatory requirement and maintain healthy competition, the Government of New Zealand has ordered the Fixed Line Telephone Company, the largest and fully government owned company, to break up its services to ensure healthy competition, provide copper wire network of its fixed line to competitors and divide the company into wholesale, retail and network units. Services or network and services have been separated for fair competition.

([http://www.telecomasia.net/article.php?type=article&id\\_article=7426](http://www.telecomasia.net/article.php?type=article&id_article=7426)).

According to the provisions of Section 15(2) of the Act empowering the Authority to demand from any licenses the details of activities and telecommunication services done and operation by them, the NDCL has been asked to provide details, accompanied by documentary evidences, showing on which terms and conditions and at which rate the NDCL has been providing its telephone lines CDMA, ADSL, PSTN to the internet service operated by its New Service Directorate. However, the letter submitted by the NDCL on 2064.10.13(27 January 2008) does not show compliance with the provisions of Section 15(2) of the Act.

The intent underlying in the preamble of the Telecommunications Act is to make the telecommunications service reliable and widely accessible, have the private sector, too, involved in the telecommunications service and regulate and manage such service. Similarly, clauses (b), (e) and (m) of Section 13 contain legal provisions to develop and extend the telecommunications service in such a way as to encourage competition and protect the rights and interests of consumers. Similarly, the Telecommunications Policy, 2060(2004) has the following objectives vis-à-vis competition.

5(11)(6) Exemplary practices will be followed in matters such as the protection of competition measures based on the principles of the World Trade Organization (WTO), interconnection, universal service obligation, open licensing system, independent and just regulator and utilization of limited resources.

5(12)(1) Economic competency will be achieved in the field of telecommunication by

encouraging just competition among telecommunications service providers. Pending the enactment of separate legal provisions on competition in this regard, relevant provisions will be incorporated in the Telecommunications Act immediately. Best measures as adopted by the World Trade Organization will be followed to prevent unjust and unfair practices such as cross subsidy, predatory pricing, wrong use of information of competitors and withholding of information concerning competitors.

Even though services such as basic, internet/email, GSM mobile, limited mobility are being operated by the NDCL by obtaining separate licenses, the NDCL is obliged to provide service related details. However, vide its letter dated 2064.10.13(27 January 2008), the NDCL refrained from providing such details, arguing that all services are the organs of the same company NDCL, and there is no substantial meaning of the matter as to what terms and rates have been imposed by one organ. Thus, the Authority is not in a position to examine whether the condition referred to in Section 42(3) exists or not. If arrangements are made to operate the service by maintaining service related details transparently allowing studies on cross subsidy, predatory pricing on the operation of service in tune with the said guidelines of the Telecommunications Policy and Section 42(3) of the Act, service is distributed and extended in such a manner as not to be inconsonance with Section 42(3) of the Act, arrangement is made to enable other service providers to have access to the network including PSTN/GSM/CDMA/Optical Fibres/ADSL on the same terms and at the same fees as applicable in its separate service units, and provisions are made to establish and operate the licensed services such as Basic-01, Internet/email, GSM mobile, limited mobility through separate units, the activities of the licensee will be transparent, virtually enhancing competition and effective management, which will in turn help cross subsidy and predatory pricing. It is therefore held to issue a direction to the Nepal Doorsanchar Company Limited under Section 15 of the Telecommunications Act, requiring it to distribute and extend the service by making arrangements to operate the service through separate units within one year after the date of issue of this order.

There is no dispute that the petitioners have operated the internet service by establishing the main network in Kathmandu. No solid evidence or proof has been produced to prove that infrastructures required for the internet service have been prepared in any place outside the Kathmandu Valley, customers of internet service have been made by using such infrastructures and the internet customers so made have paid ISD call charged in availing the internet service through telephone dial-up means. The letter sent by the NDCL on 2064.10.27(10 February 2008) sets down grounds and

reasons, inter alia, that a maximum of four E-1s could be installed into the 1000 line capacity Remote Subscriber Unit (RSU) of the Company, and only five percent of the Total Channel Capacity pooled between RSU and Host Exchange could be offered to ISPs as every connection occupies a channel and separation of circuits for internet services through 120 channels available for 1000 lines to reduce adverse effect on voice traffic is needed and it is not technically feasible to provide for dialing like local calls throughout the country for the internet customers through the existing voice circuit. The local dialing facility being enjoyed by the NDCL customers, who are the subscribers of the internet service outside the Kathmandu valley, cannot remain stable with the existing network infrastructure consequent on the increase in the number of internet service customers and such facility cannot be continued. Moreover, it does not appear that the petition praying, *inter alia*, for the availability of the same facility to the internet service customers of the petitioner company as is available to the internet service customers of the NDCL has been filed by an internet customer who has been really aggrieved, and that any evidence or proof contained in the case file does not corroborate that the petitioner has made customers outside the Kathmandu valley by establishing the physical infrastructures required for the internet service even outside the Kathmandu valley. The petition is, therefore, hereby held to be dismissed. The rest matters be dealt with as follows:

It is ordered that information be given to the concerned person that such person may file an appeal in the Appellate Committee within 35 days if not being satisfied with the decision and that the case file be safely retained and duplicate copies hereof issued to the concerned person making application for the same in accordance with rules.

Sd.

Tulasi Bhatta

Member

We concur with the above opinion.

Sd.

Prof. Dr. Dinesh Kumar Sharma

Chairperson

Sd.

Sd.

Mahesh Prasad Adhikari

Member

Sd.

Balaram Pradhanang

Member

Bheshraj Kanel

Member

Official preparing the decision as dictated by the Authority:

Kailash Prasad Neupane

Registrar

Deputy Director (Law)

Computer: Sunder Pyakurel

Done on Friday, the 13<sup>th</sup> day of the month of Baishakh of the year 2065 (25 April 2008).