



Government of the People's Republic of Bangladesh
Bangladesh Telecommunication Regulatory Commission (BTRC)
Plot#E-5/A, Agargaon Administrative Area
Sher-E-Bangla Nagar, Dhaka, Bangladesh
Web: www.btrc.gov.bd



Request for Expressions of Interest (EOI)

For the Selection of Consulting/Audit Firm

GOVERNMENT OF THE PEOPLE'S REPUBLIC OF BANGLADESH		
1.	Ministry/Division	Posts and Telecommunications Division, Ministry of Posts, Telecommunications & Information Technology
2.	Agency	Autonomous Bodies and Other Institutions
3.	Name of Procuring Entity	Bangladesh Telecommunication Regulatory Commission (BTRC)
4.	Procuring Entity Code	Not applicable
5.	Procuring Entity District	Dhaka
6.	Expression of Interest for Selection of Consulting/Audit Firm (Lump - sum)	For Conducting Operator's Procedure and System Audit of "Bangladesh Submarine Cable PLC"
7.	EOI Ref. No.	14.32.0000.000.400.01.0001.25.351
8.	Date (dd/mm/yyyy)	02/03/2026
KEY INFORMATION		
9.	Procurement Method	Quality and Cost Based Selection (QCBS)
FUNDING INFORMATION		
10.	Budget and Source of funds	Revenue Budget and Own Funds
11.	Development Partner (if applicable)	Not applicable
PARTICULAR INFORMATION		
12.	Project/Program Code (if applicable)	Not applicable
13.	Project/Program Name (if applicable)	Not applicable
14.	EOI Closing Date and time	30/03/2026 02:00 PM
INFORMATION FOR APPLICANT		
15.	Brief Description of the Assignment	Bangladesh Telecommunication Regulatory Commission (hereinafter referred to as the 'Commission' or 'BTRC') intends to appoint a Consulting/Audit Firm for conducting Information Systems Audit of Bangladesh Submarine Cable PLC . The scope includes performing the auditing tasks in the following categories: 1) Legal and Regulatory Matters 2) Technical Matters 3) Financial Matters 4) Cyber Security Matters The details of the scope of work are mentioned in the Terms of References (TOR).
16.	Experience, Resources & Delivery Capacity Required	The lead firm (Audit Firm) must be a competent ICAB member with sufficient and high-scale auditing experience. Additionally, the lead firm and/or any of its Joint Venture, Consortium or Association (JVCA) partners must have sufficient technical and information system auditing experience in multinational telecom/IT firms. The lead firm is encouraged to associate with foreign audit firm(s) with sufficient information system (technical) audit experience in multinational environment. The details of the experience, resource and

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		delivery required are mentioned in the TOR. Detailed TOR and other relevant information are available at WEB LINK		
17.	Other Details (if applicable)	The formation, operation and obligation of JVCA shall be governed by the Rule-70 of Public Procurement Rules-2025 of Bangladesh		
18.	Association with foreign firms is	Encouraged		
	Ref. No.	Phasing of Services	Location	Indicative Start Date
				Indicative Completion Date
19.	14.32.0000.000.400.01.0001.25	Not applicable	Dhaka	After contract signing
20.	Name of the Official Inviting EOI	Mohammad Rohol Amin		
21.	Designation of the Official Inviting EOI	Director, Administration Division, BTRC		
e	Address of the Official Inviting EOI	Plot # E-5/A, Agargaon Administrative Area, Sher-E-Bangla Nagar, Dhaka-1207, Bangladesh.		
23.	Contact Details of the Official Inviting EOI	Tel: : +8802222217120 Email: diradmin@btrc.gov.bd		
The procuring entity reserves the right to accept or reject all EOIs.				



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Selection of Consulting/ Audit Firm
For Conducting Operator's Procedure and System Audit of "Bangladesh Submarine Cable PLC"

Terms of Reference (TOR)

A. Background

The Bangladesh Telecommunication Regulatory Commission (**BTRC**), established under the Bangladesh Telecommunication Regulation Act, 2001, is the regulatory body for the telecommunications industry in Bangladesh. BTRC is obligated by the Bangladesh Telecommunication Regulation Act, 2001 (Section 31) to conduct Procedure and System Audits of its licensed telecommunication operators. In fulfillment of this duty, BTRC has decided to audit BSCPLC (the **Auditee**). BSCPLC which started its operation as a public limited company on **July 01, 2008**, was initially separated from the defunct BTTB under the Bangladesh Cable and Telephone Board (Amendment) Ordinance 2008. BSCCL Changed to "Bangladesh Submarine Cable PLC (BSCPLC)". BSCPLC Commercial operation through SMW-5 began in September 2017. BSCPLC has an authorized capital of Tk 1000 crore and a paid-up capital of Tk 164.91 crore. The Auditee holds licenses and permits for:

- **Submarine Cable System (SCS)** (License obtained: April 19, 2022).
- **International Internet Gateway (IIG)** (License obtained: April 12, 2012).
- **Internet Service Provider (ISP)** (License obtained: June 14, 2015).
- **National Internet Exchange (NIX)** (License obtained: October 22, 2023).

BTRC has planned to conduct a holistic compliance on the "Auditee" across its technical systems, business processes and reporting systems. This Procedure and System Audit of BSCPLC shall cover the period of time from inception to **31/12/2025**.

B. Objectives

The broad objectives of this audit is to assess the compliance of the Auditee for all the services (SC, IIG, ISP & NIX) as licensee in accordance with telecom Act (Rules & Regulations), Guidelines, Directives, Directions, Order, Circular, Decisions and Instructions applicable to the Auditee. Various types of payment compliance will also be covered. BTRC also intends to evaluate the operational efficiency level of the Auditee through this audit.

C. Scope of Services

The Consulting/ Audit Firm is to conduct Operator's Procedure and System Audit of "Auditee" under the purview/areas/categories of Legal & Regulatory Matters, Technical Matters, Financial Matters, Commercial Matters and any other related matters. The details of the scope of services are mentioned below:

1. Legal & Regulatory Matters

- 1.1. Verify compliance with the provisions of the Bangladesh Telecommunication Regulation Act 2001, Rules, Regulations, Directives, Directions, Order, Circular, Decisions of the Government/Commission and the licensing obligations;
- 1.2. Evaluate the customer acquisition/sales process with respect to the licensing obligations and BTRC regulations / directives. Also, verify whether respective operators' demands for network connections were fulfilled by the Auditee.

- 1.3. Verify whether tariff applied/charged against different services by the Auditee are in consistence with the approved tariff. Also verify that the offered services of Auditee were complied with the SC, IIG, ISP & NIX license conditions and other relevant rules of BTRC.
- 1.4. Evaluate the customer service processes and their effectiveness with respect to the commitments, licensing obligations and BTRC regulations / directives.
- 1.5. Verify whether the agreements executed with other operators are in compliance with the legal and regulatory framework.
- 1.6. Verify the compliance of the receipt, repayment and utilization of the local and foreign loans of "Auditee" with all applicable rules and regulations of Bangladesh.
- 1.7. Verify the procurement process of the operator in relation to tax evasion and/or excess foreign exchange transfer and other processes where applicable;
- 1.8. Verify whether the Human Resource policies and procedures implemented are consistent with the requirements of Bangladesh Labour Law; whether employees were actually provided with salary, allowances and other benefits in accordance with Auditee's policy, Bangladesh labour law and other applicable legislation.
- 1.9. Verify the share valuation and authenticity of the transfer and the transfer value as and when applicable. Also check the payment of share-transfer related fees as applicable.
- 1.10. Verify whether the Auditee conducted the business with fair and competitive manner and there was no discrimination in their business conduct.
- 1.11. Verify and evaluate the compliance with the contracts/ Agreements signed with various government projects/ organizations as well as different foreign tier-1 and tier-2 carriers.
- 1.12. Verify the reporting accuracy and timeliness.
- 1.13. Verify the compliances of regulations/ circulars issued by Bangladesh Bank regarding any foreign transactions.

2. Technical Matters

- 2.1. Verify whether the Auditee complied with the rollout obligations.
- 2.2. Verify whether the inter-operator lease agreements or contracts were properly executed in compliance with relevant rules and regulations. Verify whether the SC, IIG, ISP & NIX service quality (QoS) is up to the mark as committed by it or required by agreements or BTRC regulations/guidelines. Also consider the service level agreements (SLAs) established between Auditee and other operators.
- 2.3. Verify whether the Auditee complied with the reporting requirements as specified by BTRC in the SC, IIG, ISP & NIX license and other regulations and directives.
- 2.4. Evaluate how the Auditee designed and implemented the network in the areas of mechanical structure, civil work, nodal points, power supply and OFC links in compliance with relevant rules and regulations. Verify whether proper permits were obtained and complied with for working in each of these areas.
- 2.5. Evaluate the efficiency of SC, IIG, ISP & NIX operation of Auditee from the perspectives of efficient utilization of the developed infrastructure and cost optimization with a focus on civil, mechanical, electrical and operational aspects of the infrastructure. Also review the SC, IIG, ISP & NIX Operating Center in use. Also, identify the key challenges to reduce the transmission costs and the costing model in use by the Auditee.
- 2.6. Whether the equipment & software were imported with taking necessary approval (NOC) of BTRC.
- 2.7. Verify whether the auditee maintain adequate security system for its data center and other important technical premises.



- 2.8. For IIG verify if any cache servers used by the auditee, NOC from BTRC was taken properly.
- 2.9. Verify the Bandwidth reconciliation both SC & IIG, IIG & ISP.
- 2.10. Verify the Corporate IPLC usage & revenue.
- 2.11. Verify the Bandwidth/capacity export to other countries.
- 2.12. Verify whether the Colocation services at landing stations provided in accordance with the related guidelines.
- 2.13. Data Information System (DIS) reporting compliance.
- 2.14. Verify different incident/ maintenance events, restoring time and backup plans.

3. Financial Matters

- 3.1. Verify whether the reported revenues of Auditee were accurate.
- 3.2. Verify the payment of VAT, Tax, Supplementary Duty, Customs Duty, Levy and applicable duties on equipment, software and on all other apparatus, services and all kinds of BTRC payments.
- 3.3. Verify whether the license fees, revenue sharing and other fees were paid to BTRC in compliance with the SC, IIG, ISP & NIX license. Also consider the revenue-sharing from the proceeds of asset sales.
- 3.4. Verify the accuracy and timeliness of inter-operator payments for inter-connections and other services. Include the contractual provisions between Auditee and other parties in this exercise.
- 3.5. Analyze the audited financial statements in detail and verify any possible Understatement / misstatement / manipulation of facts in the reported financial figures.
- 3.6. Evaluate whether the auditee properly issues invoices to the customers and collect bill amount.
- 3.7. Verify the auditee maintain its accounts in compliance with accounting standards.
- 3.8. Verify the monthly sales & purchase bandwidth report as per invoice to the client.
- 3.9. Verify the invoice (if any under or over) through the bandwidth or technical equipment imported by the auditee.
- 3.10. Verify the auditee identify and maintain its assets separation based on different licenses.
- 3.11. Verify the auditee maintain its accounts separation based on different licenses.
- 3.12. Verify the revenue earned through colocation services in landing stations and data centers.

4. Any Other Matter(s)

- 4.1. Verify and evaluate existing cyber security arrangements of the SCS, IIG, ISP & NIX operator and their strength and effectiveness to defend its network, customer data and telecom services from malicious external attacks and recommend necessary way forward.
- 4.2. Any other matter(s) falling under the compliance mandates of an SCS, IIG, ISP & NIX operator.

5. Reporting

This Consultant shall complete the audit within **06** months and shall deliver the following reports.

- i) **Inception Report** submission within 30 (thirty) days of commencement of the audit. An initial Audit Plan and Methodology on each service of the licensee to carry out the substantive testing should be included in the inception report.
- ii) **Interim (Monthly Progress) Report:** After submission of inception report First Interim report to be prepared and submitted to BTRC within 45 (forty-five) days. Second interim report to be submitted within 45 (forty-five) days after submission of first interim report. The progress reports should include the following:
 - Cumulative progress of audit from the inception of the audit.

- Progress of the reporting month.
 - A summary of any important matters arising from the audit, including any financial irregularities detected by the consultant.
 - Activities for the next period.
- iii) **Draft final Report:** within 30 (thirty) draft final report to be prepared and submitted to BTRC after submission of second interim report on each service of the licensee, containing the complete findings and recommendations. Before submission of the Draft Audit Report, the Consultant shall discuss with and disseminate the audit findings to BTRC in discussion meetings. BTRC will share the report with the auditee for their response.
- iv) **Final Audit Report** to be prepared and submitted to BTRC after submission of Draft final report. Before submission of the Final Report, the Consultant shall discuss with and disseminate the audit findings to BTRC in discussion meetings. Considering all the feedback/responses from the auditee and BTRC, the Consultant shall finalize the Report and submit these to BTRC.
- v) **Users Manual and Training (Where applicable):** within 02 months of project commencement the Consulting/Audit Firm shall conduct an Operator's Procedure and System Audit Training..

Experience, Resources & Delivery Capacity Required

1. Required experience of the Consulting/Audit Firm are as follows:

- i) Interested firms are invited to provide information indicating their qualifications to perform the assignment, including brochures, detailed descriptions of similar assignments, experience under similar conditions, availability of appropriately qualified professional staff, and evidence of technical and financial capability.
- ii) The Lead Firm must be a competent member of the Institute of Chartered Accountants of Bangladesh (ICAB) and registered with the Registrar of Joint Stock Companies and Firms (RJSC) and shall have at least 05 (five) years of proven experience in Auditing.
- iii) At least one firms of the Consortium/JVCA shall also have minimum (05) years of experience in Information System Auditing in domains such as IT audit, telecom audit, digital platform audit, cybersecurity audit, or network/database audit.
- iv) Any debarment of either the Lead Firm or any JVCA partner from professional practice by ICAB, the concerned government authority, or any international professional audit/regulatory body shall render the applicant ineligible for this selection.

v) The proposed team must include at least the following professionals:

- One (01) Chartered Accountant;
- One (01) Financial Management Expert (FCA/ACA/FCMA/ACMA/ACCA/CIMA/MBA);
- One (01) Legal Expert (LLM/Barrister) with minimum ten (10) years of consecutive practicing experience in High-Court in corporate, telecom, and financial regulatory matters.

vi) The technical audit team must include:

- One (01) Certified Information Systems Auditor (CISA) with B.Sc. in Electrical/ Telecom/Computer Engineering and direct ICT/ Related Discipline with telecom auditing experience, at least one should have 05 years of such experience;
- One (01) Cybersecurity Expert (CISSP/CEH/OSCP or equivalent) with at least four (04) years of hands-on audit/assessment experience in critical telecom/ICT systems;
- Two (02) Telecom/IT Systems Engineer/Related Discipline with proven experience in NPCH/CNPDB, OSS/BSS, or clearinghouse platforms.

vii) Availability of appropriate audit tools/software for information system audit, to perform the task under the ToR. The bidder must present the features in a manner that demonstrates the tools' suitability for auditing NPCH, CNPDB, and other functions under the ToR.

E. Other Instructions

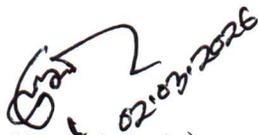
- i) The Lead Firm shall submit EOI/Proposal, sign all agreements/contracts with BTRC and remain responsible for submission of correspondences and reports of this audit.
- ii) Interested Consulting/Audit Firm must provide documented evidence in support to their qualifications and experience required to perform the services (brochures, description of similar assignment, valid practicing certificate of the partners issued by ICAB, experience of similar conditions, availability of appropriate professional qualified and experienced staffs, technical & financial capabilities etc.).
- iii) The bidder must submit the CVs of the team members with photograph, NID, academic and professional certificates, evidence of experience signed by the individuals and counter signed by authorized representative. One Key professional staff is not allowed to offer his/her inputs in more than one Proposal for this particular assignment and, in this particular procurement process.
- iv) The firms shall not have conflict of interest pursuant to rule 71 of the Public Procurement Rules 2025.
- v) The Consulting/Audit Firm will be selected in accordance with PPA-2006 and PPR-2025.
- vi) Interested applicants may obtain information which will be available on the BTRC web site at www.btrc.gov.bd. Further information may be obtained within 15 days of publication of the EOI by applying to the address below during office hours between 10:00 and 16:00 hours BST (i.e., GMT+6).
- vii) The Commission may at any time alter, amend or modify this notice or its any provision as and when necessary.
- viii) The Commission reserves the right and authority to postpone or cancel, without assigning any reason thereof, this notice or the proceedings hereunder, wholly or partially for national interest or any other reasonable cause considered fit and proper to the Commission.

F. Knowledge Transfer

The Consulting/Audit Firm shall conduct an Operator's Procedure and System Audit Training for 10 (ten) BTRC officials for 10 (ten) days by qualified experts within 02 months of project commencement. The training shall be suitably designed for SCS, IIG, ISP & NIX audit. The objective of this training is that the participating BTRC officials would have a better understanding of the audit approach in the SCS, IIG, ISP & NIX sector so that they can monitor the SCS, IIG, ISP & NIX audit with higher efficiency.

G. Instruction for Submission

- i. 02 (two) sets of hard copy (1 x Original and 1 x True Copy) and soft copy (in USB Drive, Word & PDF format) of EOI must be submitted to Chairman, BTRC, Plot # E-5/A, Agargaon Administrative Area, Sher-E-Bangla Nagar, Dhaka-1207, Bangladesh.
- ii. Envelope should be clearly marked with "Expression of Interest for Selection of Audit Firm for Operator's Procedure and System Audit of Bangladesh Submarine Cable Company Limited".


(Mohammad Rohol Amin)

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