

RELIANCE Communications

Anil Dhirubhai Ambani Group

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2009 OCT 26 A 11: 28

OFFICE OF INTERNATIONAL
CORPORATE FINANCE

Reliance Communications Limited
Dhirubhai Ambani Knowledge City
Navi Mumbai - 400 710.

Tel. : +91 22 3038 6286
Fax : +91 22 3037 6622
www.rcom.co.in

Exemption File No. 82 – 35005

22nd October, 2009

Mr. Paul M. Dudek
Securities and Exchange Commission
Division of Corporation Finance
Office of International Corporate Finance
100 F Street, NE
Washington, DC 20549
USA

SUPPL

Dear Mr. Dudek,

We refer to your letter granting exemption under Rule 12g3-2 (b) of the Securities Act, 1934 and wish to inform you that we have submitted a letter dated 22nd October, 2009 intimating about convening the Board Meeting to consider and approve unaudited financial result for the quarter and half year ended 30th September, 2009.

Copy of the aforesaid letter is enclosed herewith for your information and record.

Kindly take the same on record.

Thanking You.

Yours Faithfully,
For **Reliance Communications Limited**



Hasit Shukla
President and Company Secretary

Encl: As Above



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10/26

RELIANCE Communications

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2009 OCT 26 A 11: 28

OFFICE OF INTERNATIONAL
CORPORATE FINANCE

Reliance Communications Limited
Dhirubhai Ambani Knowledge City
Navi Mumbai 400 710.

Tel : +91 022 30386286
Fax: +91 022 30376622
www.rcom.co.in

22nd October, 2009

The General Manager
Corporate Relationship Department
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort,
Mumbai 400 001
Fax No.: 2272 2037/39/41/61/3121/3719
BSE Scrip Code: 532712

The Manager
National Stock Exchange of India Ltd.
Exchange Plaza, C/1, Block G
Bandra - Kurla Complex,
Bandra (East)
Mumbai 400 051
Fax No.: 2659 8237 / 38
NSE Symbol: RCOM

Dear Sir,

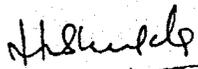
Sub: Unaudited financial Results for the quarter and half year ended 30th September, 2009.

In terms of Clause 41 of the Listing Agreement entered with the Stock Exchanges, we wish to inform you that a meeting of the Board of Directors of the Company is scheduled to be held on Friday, the 30th October, 2009, inter alia, to consider and approve the Unaudited Financial Results for the quarter and half year ended 30th September, 2009.

Kindly inform your members accordingly.

Thanking you.

Yours faithfully,
For Reliance Communications Limited



Hasit Shukla
President and Company Secretary

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2009 OCT 26 A 11: 23

OFFICE OF INTERNATIONAL
CORPORATE FINANCE

Reliance Communications Limited
Dhirubhai Ambani Knowledge City
Navi Mumbai - 400 710.

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Exemption File No. 82 – 35005

20th October, 2009

✓
Mr. Paul M. Dudek
Securities and Exchange Commission
Division of Corporation Finance
Office of International Corporate Finance
100 F Street, NE
Washington, DC 20549
USA

SUPPL

We refer to your letter granting exemption under Rule 12g3-2 (b) of the Securities Act, 1934 and wish to inform you that we have submitted following letters to the Stock Exchanges in India as per requirements of the Listing Agreement.

- (1) Compliance Report on Corporate Governance for the quarter ended 30th September, 2009.
- (2) Shareholding pattern for the quarter ended 30th September, 2009.
- (3) Free float indices for the quarter ended 30th September, 2009.
- (4) Secretarial Audit Report for the quarter ended 30th September, 2009.
- (5) Certificate under clause 47(c) of the Listing Agreement for the six months ended 30th September, 2009.

Copies of the aforesaid letters are enclosed herewith for your information and record.

Kindly take the same on record.

Thanking You.

Yours Faithfully,
For Reliance Communications Limited


Hasit Shukla
President and Company Secretary

Encl: As Above

RELIANCE Communications

Anil Dhirubhai Ambani Group

Exe File No. 82-35005

Reliance Communications Limited
Dhirubhai Ambani Knowledge City
Navi Mumbai - 400 710.

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www.rcom.co.in

Ref: SE/CC/03/2009-10

October 14, 2009

✓
The General Manager
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort,
Mumbai 400 001
Fax No.: 2272 2037/39/41/61/3121/3719
BSE Scrip Code: 532712

The Manager
National Stock Exchange of India Ltd.
Exchange Plaza, C/1, Block G
Bandra - Kurla Complex, Bandra (East)
Mumbai 400 051
Fax No.: 2659 8237 / 38
NSE Symbol: RCOM

Dear Sir,

Sub: **Compliance Report on Corporate Governance for the quarter ended 30th September, 2009.**

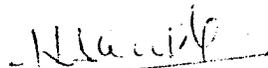
Pursuant to Clause 49 of the Listing Agreement, we submit herewith a Compliance Report on Corporate Governance for the quarter ended 30th September, 2009.

We confirm that the Company is in compliance with the provisions of Clause 49 of the Listing Agreement.

You are requested kindly take the same on your record.

Thanking You.

Yours faithfully
For Reliance Communications Limited


Hasit Shukla
President and Company Secretary

Encl: As above

RELIANCE Communications

Anil Dhirubhai Ambani Group

Reliance Communications Limited
Dhirubhai Ambani Knowledge City
Navi Mumbai - 400 710.

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Quarterly Compliance Report on Corporate Governance

Name of the Company: Reliance Communications Limited

Quarter ending on: 30th September, 2009

| Particulars | Clause of Listing Agreement | Compliance status (Yes/No/N.A.) | Remarks |
|--|-----------------------------|---------------------------------|---------|
| I. Board of Directors | 49 (I) | YES | |
| (A) Composition of Board | 49 (IA) | YES | |
| (B) Non-executive Directors' compensation & disclosures | 49 (IB) | YES | |
| (C) Other provisions as to Board and Committees | 49 (IC) | YES | |
| (D) Code of Conduct | 49 (ID) | YES | |
| II. Audit Committee | 49 (II) | YES | |
| (A) Qualified & Independent Audit Committee | 49 (IIA) | YES | |
| (B) Meeting of Audit Committee | 49 (IIB) | YES | |
| (C) Powers of Audit Committee | 49 (IIC) | YES | |
| (D) Role of Audit Committee | 49 II(D) | YES | |
| (E) Review of Information by Audit Committee | 49 (IIE) | YES | |
| III. Subsidiary Companies | 49 (III) | YES | |
| IV. Disclosures | 49 (IV) | YES | |
| (A) Basis of related party transactions | 49 (IV A) | YES | |
| (B) Disclosure of Accounting Treatment | 49 (IV B) | YES | |
| (C) Board Disclosures | 49 (IV C) | YES | |
| (D) Proceeds from public issues, rights issues, preferential issues etc. | 49 (IV D) | YES | |
| (E) Remuneration of Directors | 49 (IV E) | YES | |
| (F) Management | 49 (IV F) | YES | |

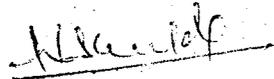


RELIANCE Communications

Anil Dhirubhai Ambani Group

| | | | |
|------------------------------------|-----------|-----|--|
| (G) Shareholders | 49 (IV G) | YES | |
| V. CEO/CFO Certification | 49 (V) | YES | |
| VI. Report on Corporate Governance | 49 (VI) | YES | |
| VII. Compliance | 49 (VII) | YES | |

For Reliance Communications Limited



Hasit Shukla
President and Company Secretary



Date: 14.10.2009

Reliance Communications Limited
Dhirubhai Ambani Knowledge City
Navi Mumbai - 400 710.

Tel.: +91 22 3038 6286
Fax: +91 22 3037 6622
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Ref: SE/35/003/2009-10

October 20, 2009.

The General Manager
Corporate Relationship Department
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort,
Mumbai 400 001
Fax No.: 2272 2037/39/41/61/3121/3719
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The Manager
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Bandra - Kurla Complex, Bandra (East)
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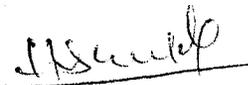
Dear Sir,

Sub: Shareholding Pattern for the quarter ended 30th September, 2009.

Pursuant to Clause 35 of the Listing Agreement entered with the Stock Exchanges, we submit herewith Shareholding Pattern of the Company for the quarter ended 30th September, 2009.

Kindly take the same on record.

Yours faithfully
For Reliance Communications Limited


Hasit Shukla
President and Company Secretary

Encl: As above

I(a) STATEMENT SHOWING SHAREHOLDING PATTERN

Name of the Company: **RELIANCE COMMUNICATIONS LIMITED**

| Scrip Code : BSE - 532712 NSE - RCOM | | | Quarter ended as on: 30 th September, 2009 | | | | | |
|--------------------------------------|---|--------------------------|---|--|--|----------------------------------|--|----------------------------------|
| Category Code (I) | Category of Shareholder (II) | No of Shareholders (III) | Total No of Shares (IV) | Number of shares held in dematerialised Form (V) | Total Shareholding as percentage of total number of shares | | Shares Pledged or otherwise encumbered | |
| | | | | | As a percentage of (A+B) (VI) | As a percentage of (A+B+C) (VII) | No of Shares Pledged (VIII) | As a percentage (IX=VIII/IV*100) |
| (A) | Shareholding of Promoter and Promoter Group | | | | | | | |
| (1) | Indian | | | | | | | |
| (a) | Individuals/Hindu Undivided Family | 11 | 9845089 | 9844989 | 0.48 | 0.48 | 0 | 0.00 |
| (b) | Central Government/State Governments | 0 | 0 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| (c) | Bodies Corporate | 37 | 1368295971 | 1368274468 | 66.77 | 66.29 | 159181411 | 11.63 |
| (d) | Financial Institutions/Banks | 0 | 0 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| (e) | Any Other (Specify) | 1 | 9200000 | 9200000 | 0.45 | 0.45 | 0 | 0.00 |
| | Sub -Total (A)(1) | 49 | 1387341060 | 1387319457 | 67.70 | 67.22 | 159181411 | 11.47 |
| (2) | Foreign | | | | | | | |
| (a) | Individuals(Non-Resident Individuals/Foreign Individuals) | 0 | 0 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| (b) | Bodies Corporate | 0 | 0 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| (c) | Institutions | 0 | 0 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| (d) | Any Other (Specify) | 0 | 0 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| | Sub -Total (A)(2) | 0 | 0 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| | Total of Promoter and Promoter Group (A)=(A)(1)+(A)(2) | 49 | 1387341060 | 1387319457 | 67.70 | 67.22 | 159181411 | 11.47 |
| (B) | Public Shareholding | | | | | | | |
| (1) | Institutions | | | | | | N/A | N/A |
| (a) | Mutual Funds /UTI | 304 | 347 04 770 | 34231805 | 1.69 | 1.68 | 0 | 0.00 |
| (b) | Financial Institutions/Banks | 408 | 3934310 | 3811554 | 0.19 | 0.19 | 0 | 0.00 |
| (c) | Central Government/State Governments | 62 | 1056375 | 56256 | 0.05 | 0.05 | 0 | 0.00 |
| (d) | Venture Capital Funds | 0 | 0 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| (e) | Insurance Companies | 29 | 163385180 | 163378601 | 7.97 | 7.92 | 0 | 0.00 |
| (f) | Foreign Institutional Investors | 611 | 192885710 | 192762941 | 9.41 | 9.35 | 0 | 0.00 |
| (g) | Foreign Venture Capital Investors | 0 | 0 | 0 | 0.00 | 0.00 | 0 | 0.00 |
| (h) | Any Other (Specify) | | | | | | | |
| | Sub -Total (B)(1) | 1414 | 3959 66 345 | 394241157 | 19.32 | 19.18 | 0 | 0.00 |
| (2) | Non-Institutions | | | | | | N/A | N/A |
| (a) | Bodies Corporate | 9229 | 48862207 | 48183793 | 2.38 | 2.37 | 0 | 0.00 |
| (b) | i.Individual shareholders holding nominal sharecapital up to Rs.1Lakh. | 2061840 | 190906450 | 143672049 | 9.32 | 9.25 | 0 | 0.00 |
| | ii.Individual shareholders holding nominal sharecapital in excess of Rs.1Lakh. | 136 | 13428035 | 12850539 | 0.66 | 0.65 | 0 | 0.00 |
| (c) | Any Other (Specify) | | | | | | N/A | N/A |
| 1 | NRIs/OCBs | 20990 | 12859385 | 8932697 | 0.63 | 0.62 | 0 | 0.00 |
| | Sub -Total (B)(2) | 2092195 | 266056077 | 213639078 | 12.98 | 12.89 | 0 | 0.00 |
| | Total Public Shareholding B=(B)(1)+(B)(2) | 2093609 | 6620 22 422 | 607880235 | 32.30 | 32.07 | 0 | 0.00 |
| | TOTAL (A) +(B) | 2093658 | 20493 63 482 | 1995199692 | 100.00 | 99.29 | 159181411 | 7.77 |
| (C) | Shares held by Custodians and against which Depository Receipts have been issued | | | | | | | |
| | | 1 | 14663399 | 14663399 | 0.00 | 0.71 | 0 | 0.00 |
| | GRAND TOTAL (A)+(B)+(C) | 2093659 | 20640 26 881 | 2009863091 | 100.00 | 100.00 | 159181411 | 7.71 |



RELIANCE COMMUNICATIONS LIMITED
(SHAREHOLDING PATTERN- 30.09.2009)

I(b) **Statement showing shareholding of persons belonging to the category "Promoter and Promoter Group"**

| Sr No (I) | Name of the shareholder (II) | Total Shares held | | Shares Pledged or otherwise encumbered | | |
|--------------|--|-----------------------|---|--|------------------------------|--|
| | | No of shares (III) | As a % of Grand Total (A)+(B)+(C) (IV) | No of Shares Pledged (V) | As a % (VI)=(V)/(III)*100 | As a % of grand total (A)+(B)+(C) of Sub-clause (VII) |
| 1 | AAA Communication Private Limited | 1 11 78 84 828 | 54.16 | 159181411 | 14.24 | 7.71 |
| 2 | AAA Industries Private Limited | 9 51 12 672 | 4.61 | 0 | 0.00 | 0.00 |
| 3 | ADA Enterprises and Ventures Private Limited | 9 51 12 672 | 4.61 | 0 | 0.00 | 0.00 |
| 4 | Hansdhvani Trading Company Pvt. Ltd | 30 00 040 | 0.15 | 0 | 0.00 | 0.00 |
| 5 | Mast Jaianmol A. Ambani (through Father and natural guardian Shri Anil D. Ambani) | 16 69 759 | 0.08 | 0 | 0.00 | 0.00 |
| 6 | Mast Jaianshul A. Ambani (through Father and natural guardian Shri Anil D. Ambani) | 100 | 0.00 | 0 | 0.00 | 0.00 |
| 7 | Reliance ADA Group Trustees Private Limited - Trusees of RCOM ESOS Trust | 92 00 000 | 0.45 | 0 | 0.00 | 0.00 |
| 8 | Reliance Capital Limited | 1 14 41 758 | 0.55 | 0 | 0.00 | 0.00 |
| 9 | Reliance General Insurance Co Ltd | 90 000 | 0.00 | 0 | 0.00 | 0.00 |
| 10 | Reliance Innoventures Private Limited | 1 15 29 001 | 0.56 | 0 | 0.00 | 0.00 |
| 11 | Shri Anil D. Ambani | 18 59 171 | 0.09 | 0 | 0.00 | 0.00 |
| 12 | Smt. Kokila D. Ambani | 46 65 227 | 0.23 | 0 | 0.00 | 0.00 |
| 13 | Smt. Tina A. Ambani | 16 50 832 | 0.08 | 0 | 0.00 | 0.00 |
| 14 | Solaris Information Technologies Private Limited | 1 58 50 000 | 0.77 | 0 | 0.00 | 0.00 |
| 15 | Sonata Investments Limited | 1 82 75 000 | 0.89 | 0 | 0.00 | 0.00 |
| | TOTAL | 1 38 73 41 060 | 67.22 | 159181411 | 11.47 | 7.71 |



RELIANCE COMMUNICATIONS LIMITED
(SHAREHOLDING PATTERN - 30.09.2009)

I(c) Statement showing shareholding of persons belonging to the category "Public" and holding more than 1% of the total number of shares

| Sr No | Name of the shareholder | No of shares | Shares as a percentage of total number of shares (i.e., Grand Total (A)+(B)+(C) indicated in statement at para(I)(a) above) |
|-------|-------------------------------------|------------------|---|
| 1 | Life Insurance Corporation of India | 149702997 | 7.25 |
| | TOTAL | 149702997 | 7.25 |



RELIANCE COMMUNICATIONS LIMITED
(SHAREHOLDING PATTERN - 30.09.2009)

l(d) **Statement showing details of locked -in shares**

| Sr No | Name of the shareholder | Category of Shareholders (Promoters/Public) | No of locked-in shares | Locked-in shares as a percentage of total number of shares(i.e.,Grand Total (A)+(B)+(C) indicated in statement at para(l)(a) above) |
|-------|-----------------------------------|--|------------------------|--|
| 1 | AAA Communication Private Limited | Promoter | 205371142 | 9.95 |
| | TOTAL | | 205371142 | 9.95 |



RELIANCE COMMUNICATIONS LIMITED
(SHAREHOLDING PATTERN - 30.09.2009)

II(a) **Statement showing details of Depository Receipts (DRs)**

| Sr No | Type of outstanding DR (ADRs,GRDs, SDRs,etc.) | Number of outstanding DRs | No of shares underlying outstanding DRs | Shares underlying outstanding DRs as a percentage of total number of shares(i.e.,Grand Total (A)+(B)+(C) indicated in statement at para(I)(a) above} |
|-------|--|---------------------------|--|--|
| 1 | GDRs | 14663399 | 14663399 | 0.71 |
| | TOTAL | | 14663399 | 0.71 |



RELIANCE COMMUNICATIONS LIMITED
(SHAREHOLDING PATTERN -30.09.2009)

II(b) **Statement showing Holding of Depository Receipts (DRs), where underlying shares are in excess of 1% of the total number of shares**

| Sr No | Name of the DR Holder | Type of outstanding DR (ADRs,GRDs, SDRs,etc.) | No of shares underlying outstanding DRs | Shares underlying outstanding DRs as a percentage of total number of shares(i.e.,Grand Total (A)+(B)+(C) indicated in statement at para(I)(a) above) |
|-------|-----------------------|---|---|--|
| 1 | N/A | N/A | Nil | - |
| | TOTAL | | 0 | 0.00 |



RELIANCE Communications
Anil Dhirubhai Ambani Group

BKR. file No. 82-3505
012

Reliance Communications Limited
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October 14, 2009

✓
Shri Hitesh Porwal
Index Cell
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort,
Mumbai 400 001
Fax No.: 2272 2037/39/41/61/3121/3719
BSE Scrip Code: 532712

Dear Sir,

Sub: Free-float Indices

We forward herewith Shareholding Pattern of the Company as of 30th September, 2009 for the purpose of Free-float Indices in prescribed Form No. A, B and C.

The same disclosure is sent to you by e-mail today at indexcell@bseindia.com

Kindly take the same on record.

Yours faithfully
For Reliance Communications Limited


Hasit Shukla
President and Company Secretary

✓
Encl: As above

SHAREHOLDING PATTERN SUMMARY FOR FREE-FLOAT INDICES

| Name of the Company : RELIANCE COMMUNICATIONS LIMITED | | | |
|---|---|-----------------------|--|
| | Scrip Code | 532712 | Quarter ended 30 th September, 2009 |
| Category Code | Category | No.of Shares Held | % of Shareholding |
| I | CONTROLLING/STRATEGIC HOLDINGS | | |
| A | BASED IN INDIA | | |
| 1 | Indian Individuals/HUFs & Relatives | 98 45 089 | 0.48 |
| 2 | Indian Corporate Bodies/ Trusts/ Partnerships | 1 33 84 89 213 | 64.85 |
| 3 | Persons Acting in Concert (also include Suppliers/ Customers) | 3 90 06 758 | 1.89 |
| 4 | Other Directors & Relatives (other than in 1 above) | 0 | 0.00 |
| 5 | Employee Welfare Trusts/ESOPs (already converted into shares but locked in) | 0 | 0.00 |
| 6 | Banks/Financial Institutions | 0 | 0.00 |
| 7 | Central/ State Govt. | 0 | 0.00 |
| 8 | Central/ State Govt. Institutions | 0 | 0.00 |
| 9 | Venture Funds/ Private Equity Funds | 0 | 0.00 |
| | Sub Total A | 1 38 73 41 060 | 67.22 |
| B | BASED OVERSEAS | | |
| 10 | Foreign Individuals (including FDI) | 0 | 0.00 |
| 11 | Foreign Corporate Bodies (including FDI) | 0 | 0.00 |
| 12 | Non Resident Indians (Individuals) | 0 | 0.00 |
| 13 | Non Resident Indian Corporate Bodies | 0 | 0.00 |
| | Sub Total B | 0 | 0.00 |
| C | GDRs/ADRs/ ADSs | 0 | 0.00 |
| | Sub Total C | 0 | 0.00 |
| D | OTHERS (Please specify here) | 0 | 0.00 |
| | Sub Total D | 0 | 0.00 |
| E | ANY OTHER SHARES LOCKED-IN (except covered above) | 0 | 0.00 |
| | Sub Total E | 0 | 0.00 |
| | Sub Total I | 1 38 73 41 060 | 67.22 |

....contd



| II | FREE FLOAT | No.of Shares Held | % of Shareholding |
|----------|---|-----------------------|-------------------|
| A | BASED IN INDIA | | |
| 1 | Indian Individuals/HUFs | 20 43 08 011 | 9.90 |
| 2 | Indian Corporate Bodies/Trusts/Partnerships | 4 88 62 207 | 2.37 |
| 3 | Independent Directors & Relatives | 698 | 0.00 |
| 4 | Present Employees | 3 774 | 0.00 |
| 5 | Banks/Financial Institutions | 39 34 310 | 0.19 |
| 6 | Central/State Govt. | 0 | 0.00 |
| 7 | Central/ State Govt. Institutions | 10 56 375 | 0.05 |
| 8 | Insurance Companies | 16 33 85 180 | 7.92 |
| 9 | Mutual Funds | 3 47 04 770 | 1.68 |
| 10 | Venture Funds/ Private Equity Funds | 0 | 0.00 |
| 11 | Customers | 0 | 0.00 |
| 12 | Suppliers | 0 | 0.00 |
| | Sub Total A | 45 62 55 325 | 22.11 |
| B | BASED OVERSEAS | | |
| 13 | Foreign Individuals | 0 | 0.00 |
| 14 | Foreign Corporate Bodies | 2 88 479 | 0.01 |
| 15 | Foreign Institutional Investors (SEBI-registered) | 19 28 85 710 | 9.35 |
| 16 | Non Resident Indians (Individuals) | 1 25 70 906 | 0.61 |
| 17 | Non Resident Indian Corporate Bodies | 0 | 0.00 |
| | Sub Total B | 20 57 45 095 | 9.97 |
| C | GDRs/ADRs/ADSs | 1 46 63 399 | 0.71 |
| | Sub Total C | 1 46 63 399 | 0.71 |
| D | OTHERS (Please specify here _____) | | |
| | Pending confirmation | 22 002 | 0.00 |
| | Sub Total D | 22 002 | 0.00 |
| | Sub Total II | 67 66 85 821 | 32.78 |
| | Grand Total | 2 06 40 26 881 | 100.00 |

| BROAD SUMMARY OF HOLDINGS | No.of Shares Held | % of Shareholding |
|---------------------------------------|--------------------------|--------------------------|
| Total Controlling/ Strategic Holdings | 1 38 73 41 060 | 67.22 |
| Total Free-float | 67 66 85 821 | 32.78 |
| Grand Total | 2 06 40 26 881 | 100.00 |

| SUMMARY OF DOMESTIC/FOREIGN HOLDINGS | No.of Shares Held | % of Shareholding |
|---|--------------------------|--------------------------|
| Total Domestic Holding | 1 84 36 18 387 | 89.32 |
| Total Foreign Holding | 22 04 08 494 | 10.68 |
| Grand Total | 2 06 40 26 881 | 100.00 |



CONTROLLING/STRATEGIC HOLDERS

(Include every single holder and list them Categorywise)

| Name of the Company : RELIANCE COMMUNICATIONS LIMITED | | | | |
|---|---|-----------------------|-------------------|----------------------------------|
| | Scrip Code | 532712 | Quarter Ended | 30 th September, 2009 |
| Sl.No. | Holders Name | No.of Shares Held | % of Shareholding | Category Code |
| 1 | SMT. KOKILA D. AMBANI | 46 65 227 | 0.23 | I-A-1 |
| 2 | SHRI ANIL D AMBANI | 18 59 171 | 0.09 | I-A-1 |
| 3 | MASTER JAANMOL A. AMBANI (through Father and natural guardian Shri Anil D. Ambani) | 16 69 759 | 0.08 | I-A-1 |
| 4 | SMT. TINA A AMBANI | 16 50 832 | 0.08 | I-A-1 |
| 5 | MASTER JAANSHUL A. AMBANI (through Father and natural guardian Shri Anil D. Ambani) | 100 | 0.00 | I-A-1 |
| 6 | AAA COMMUNICATION PRIVATE LIMITED | 1 11 78 84 828 | 54.16 | I-A-2 |
| 7 | AAA INDUSTRIES PRIVATE LIMITED | 9 51 12 672 | 4.61 | I-A-2 |
| 8 | ADA ENTERPRISES AND VENTURES PRIVATE LIMITED | 9 51 12 672 | 4.61 | I-A-2 |
| 9 | HANSDHWANI TRADING COMPANY PVT. LTD. | 30 00 040 | 0.15 | I-A-2 |
| 10 | RELIANCE INNOVENTURES PRIVATE LIMITED | 1 15 29 001 | 0.56 | I-A-2 |
| 11 | SOLARIS INFORMATION TECHNOLOGIES PRIVATE LIMITED | 1 58 50 000 | 0.77 | I-A-2 |
| 12 | RELIANCE ADA GROUP TRUSTEES PRIVATE LIMITED - TRUSEES OF RCOM ESOS TRUST | 92 00 000 | 0.45 | I-A-3 |
| 13 | RELIANCE CAPITAL LIMITED | 1 14 41 758 | 0.55 | I-A-3 |
| 14 | SONATA INVESTMENTS LIMITED | 1 82 75 000 | 0.89 | I-A-3 |
| 15 | RELIANCE GENERAL INSURANCE CO LTD | 90 000 | 0.00 | I-A-3 |
| | Total | 1 38 73 41 060 | 67.22 | |



FREE-FLOAT HOLDERS
DISCLOSE ONLY HOLDINGS OF 1% & ABOVE
 (List holders Categorywise)

| Name of the Company : RELIANCE COMMUNICATIONS LIMITED | | | | | |
|---|-------------------------------------|---------------------|-------------------|---------------|---------------------------------------|
| | Scrip Code | 532712 | | Quarter Ended | 30 th September, 2009 |
| Sl.No. | Holder's Name | No. of Shares Held | % of Shareholding | Category Code | Relationship, if any with anyone in I |
| 1 | LIFE INSURANCE CORPORATION OF INDIA | 14 97 02 997 | 7.25 | II-A-8 | NIL |
| | Total | 14 97 02 997 | 7.25 | | |



RELIANCE Communications

Anil Dhirubhai Ambani Group

Reliance Communications Limited
Dhirubhai Ambani Knowledge City
Navi Mumbai - 400 710.

Tel. : +91 22 3038 6286
Fax : +91 22 3037 6622
www.rcom.co.in

October 20, 2009

The General Manager
Corporate Relationship Department
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort,
Mumbai 400 001
Fax No.: 2272 2037/39/41/61/3121/3719
BSE Scrip Code: 532712

The Manager
National Stock Exchange of India Ltd.
Exchange Plaza, C/1, Block G
Bandra - Kurla Complex, Bandra (East)
Mumbai 400 051
Fax No.: 2659 8237 / 38
NSE Symbol: RCOM

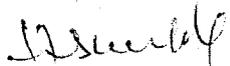
Dear Sir,

Sub: Secretarial Audit Report for the quarter ended 30th September, 2009

Pursuant to the Circular No.D&CC/FITIC/CIR -16/2002 dated December 31, 2002 issued by the Securities and Exchange Board of India, we forward herewith a Secretarial Audit Report issued by M/s. Haribhakti & Co, Chartered Accountants for the quarter ended 30th September, 2009, as required.

Kindly take the same on record.

Yours faithfully
For Reliance Communications Limited



Hasit Shukla
President and Company Secretary

Encl: As above

Ref.No. RAS-147/H-10102/HU

9th October 2009.

The Board of Directors
Reliance Communications Limited
 H' Block, 1st Floor
 Dhirubhai Ambani Knowledge City
 Navi Mumbai - 400 710

SECRETARIAL AUDIT REPORT

We have examined the Register of Members, beneficiary details furnished by the depositories and other records / documents maintained by M/s. **Reliance Communications Limited** (hereinafter referred to as the "Company") and its Registrar and Share Transfer Agents for issuing Certificate in accordance with Circular D&CC/FITTC/CIR-16/2002 dated December 31, 2002 issued by Securities and Exchange Board of India.

In our opinion and to the best of our information and according to the explanations given to us and based on such verification as considered necessary, we hereby certify the following :-

- 1 For Quarter Ended
- 2 ISIN
- 3 Face Value
- 4 Name of the Company
- 5 Registered Office Address
- 6 Correspondence Address
- 7 Telephone & Fax Nos.
- 8 Email address
- 9 Names of the Stock Exchanges where the company's securities are listed

September 30, 2009

| |
|--------------------------|
| INE330H01018 |
| Rs. 5/- per Equity Share |

| |
|---|
| Reliance Communications Limited |
| H' Block, 1st Floor, Dhirubhai Ambani Knowledge City, Navi Mumbai 400 710 |
| H' Block, 1st Floor, Dhirubhai Ambani Knowledge City, Navi Mumbai 400 710 |
| Tel No: 022 - 3038 6286, Fax No: 022 - 3037 6622 |
| hasit.shukla@relianceada.com |

- | |
|--|
| 1. Bombay Stock Exchange Limited |
| 2. National Stock Exchange of India Limited. |

- 10 Issued Capital
- 11 Listed Capital (Exchange - wise) - For Exchanges listed in '9' above (as per company records)

| Number of Shares | % of Total Issued Cap. |
|------------------|------------------------|
| 206 40 26 881 | 100.00 |
| 206 40 26 881 | 100.00 |

- 12 Held in dematerialised form in CDSL
- 13 Held in dematerialised form in NSDL
- 14 Physical

| | |
|---------------|-------|
| 5 29 87 569 | 2.57 |
| 195 68 75 522 | 94.81 |
| 5 41 63 790 | 2.62 |

- 15 Total No. of Shares (12+13+14)

| | |
|---------------|--------|
| 206 40 26 881 | 100.00 |
|---------------|--------|

- 16 Reasons for difference if any, between:

- a) (10&11):
- b) (10&15):
- c) (11&15):

| |
|----|
| NA |
| NA |
| NA |

- 17 Certifying the details of changes in share capital during the quarter under consideration as per Table below : NIL

HARIBHAKTI & CO.

Chartered Accountants

Continuation Sheet

| Particulars*** | No. of Shares. | Applied / Not Applied for listing | Listed on Stock Exchanges (Specify Names) | Whether intimated to CDSL | Whether intimated to NSDL | In-prin. appr. Pending from SE (Specify Names) |
|----------------|----------------|-----------------------------------|---|---------------------------|---------------------------|--|
|----------------|----------------|-----------------------------------|---|---------------------------|---------------------------|--|

*** Rights, Bonus, Preferential Issue, ESOPs, Amalgamation, Conversion, Buyback, Capital Reduction, Forfeiture, Any other (to specify)

18 Register of Members is updated (Yes / No)
if not, updated upto which date

| |
|-----|
| YES |
| NA |

19 Reference of previous quarter with regards to excess dematerialised shares, if any.

| |
|----|
| NA |
|----|

20 Has the company resolved the matter mentioned in point no.19 above in the current quarter ? If not, reason why ?

| |
|----|
| NA |
|----|

21 Mention the total no. of requests, if any, confirmed after 21 days and the total no. of requests pending beyond 21 days with the reasons for delay :

| Total No. of demat requests | No. of requests | No. of shares | Reasons for delay |
|-------------------------------|-----------------|---------------|--|
| Confirmed after 21 Days | 13 | 1 344 | Delay in receipt of Physical DRFs & Share Certificates from DP. |
| | 10 | 326 | Rejected since Physical DRFs & Share Certificates not received from DP within 30 days. |
| Total | 23 | 1 670 | |
| Pending for more than 21 days | 1 | 18 | Non-receipt of Physical DRFs & Share Certificates from DP |
| Total | 1 | 18 | |

22 Name, Telephone & Fax No. of the Compliance Officer of the Company

| |
|--|
| Shri Hasit Shukla Tel No.: 022 - 3038 6286 Fax No.: 022 - 3037 6622 |
| Haribhakti & Co. Chartered Accountants 42, Free Press House, 215, Nariman Point Mumbai - 400 021 Tel.: 022 6639 1101 Fax.: 022 2285 6237 |

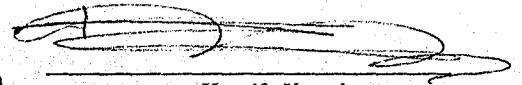
23 Name, Address, Tel. & Fax No., Regn. No. of the Auditor

| |
|--|
| Karvy Computershare Pvt. Ltd. Plot No. 17-24, Vittal Rao Nagar Madhapur Hyderabad - 500 081 |
|--|

24 Appointment of common agency for share registry work if yes (name & address)

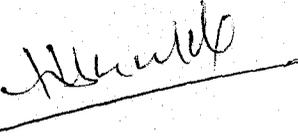
25 Any other detail that the auditor may like to provide. (e.g. BIFR company, delisting from SE, company changed its name etc.) - Nil

**CERTIFIED TRUE COPY
FOR RELIANCE COMMUNICATIONS LIMITED**



Huzeifa Unwala,
National Head - RAS
M. No.: 105711

Mumbai, 9th October 2009.


HASIT SHUKLA
COMPANY SECRETARY

RELIANCE Communications
Anil Dhirubhai Ambani Group

Reliance Communications Limited
Dhirubhai Ambani Knowledge City
Navi Mumbai - 400 710.

Tel : +91 22 3038 6286
Fax : +91 22 3037 6622
www.rcom.co.in

Ref: SE/47C/02/2009-10

October 20, 2009

The General Manager
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort,
Mumbai 400 001
Fax No : 2272 2037/39/41/61/3121/3719
BSE Scrip Code: 532712

The Manager
National Stock Exchange of India Ltd.
Exchange Plaza, C/1, Block G
Bandra - Kurla Complex, Bandra (East)
Mumbai 400 051
Fax No : 2659 8237 / 38
NSE Symbol: RCOM

Dear Sir,

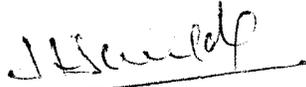
Sub: Certificate under Clause 47(c) for the six months ended 30th September, 2009.

In terms of Clause 47(c) of the Listing Agreement, we forward herewith a certificate issued by M/s. Dipak Rachchha & Co., Company Secretaries for the period 1st April, 2009 to 30th September, 2009.

Kindly take the same on record.

Thanking You.

Yours faithfully
For Reliance Communications Limited



Hasit Shukla
President and Company Secretary

Encl: As above

Dipak J. Rachchha
M.Com., LL.B., M.B.A., F.C.S.

Dipak Rachchha & Co.
Company Secretaries

401, Akshat Tower, Opp. Rajpath Club,
Sarkhej-Gandhinagar Highway, Ahmedabad-380054.
Phone : (O) 079-40030884 (M) 98250 66179
E-mail : drachchha@rediffmail.com

CERTIFICATE

On the basis of examination of all relevant books, registers, forms, documents and papers made available to us by Karvy Computershare Private Limited, Registrar and Transfer Agents of Reliance Communications Limited and on the basis of information and explanations given to us by them as well as by the company, we hereby certify that, during the period commencing from 1st April, 2009 and ended on 30th September, 2009, all the 4131 valid documents lodged for transfer, excluding those where objections were raised on technical grounds, were dispatched within one month from the date of lodgement for transfer.

In the case of valid share certificates received for split/consolidation/renewal/exchange, the issue thereof was made within one month from the date of lodgment except those where objections were raised on technical grounds.

This certificate is issued pursuant to clause 47 (c) of the listing Agreement entered into with Stock Exchanges.

Date: 20.10.09,

Place: Mumbai



DIPAK RACHCHHA & Co.
Company Secretaries,

Dipak Rachchha

(DIPAK RACHCHHA)
Proprietor

CERTIFIED TRUE COPY
FOR RELIANCE COMMUNICATIONS LIMITED

Hasit Shukla
HASIT SHUKLA
COMPANY SECRETARY