



## **AUSPI's Comments to TRAI on the Draft Telecommunication Tariff (Fifty Ninth Amendment) Order, 2014**

1. AUSPI welcomes the opportunity extended by the TRAI to comment on the draft Telecom Tariff (Fifty Ninth Amendment) Order to exempt service providers having less than 10,000 subscribers from the tariff reporting requirement.
2. The Indian telecom sector has significantly changed due to multiplicity of operators in each service area and significant growth of data services. The market is highly competitive which ensures that the consumer interest with regard to tariffs is protected. **In view of this, we request that all service providers should be exempted from tariff reporting** and not just those ISPs with minimum 10,000 subscriber base.
3. There cannot be an exemption category for tariff reporting as it is linked to consumer interest. The TRAI has mandated tariff reporting for the following reasons:
  - ✓ To ensure transparency and non-discrimination;
  - ✓ To ensure tariffs are non-predatory
  - ✓ To ensure these are compliant to regulations
  - ✓ To ensure these have been put on service providers' website
  - ✓ To ensure consumers are protected against any price hike for a minimum period of 6 months.
4. *The Authority considers that tariff reporting is essential to protect the consumer interest and specified financial disincentive for any delay in reporting of tariffs. Since tariffs reporting are linked to consumer interest, we see no reason why certain ISPs should be exempted from the tariff reporting requirement.*



5. *AUSPI suggests that there should be a uniform requirement of tariff reporting across all TSPs irrespective of their market share. If consumer interest is linked to tariff reporting, there can be no exemption for certain operators.*
  
6. *In view of the above, AUSPI does not support Telecommunication Tariff (Fifty Ninth Amendment) Order, 2014 and suggest that there should be uniform tariff reporting requirement across all service providers.*

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