

TRAI Consultation Paper on Mobile Value Added Services

Comments by:
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4.1 Whether the current provisions under various licences (UASL, CMTS, Basic and ISP) are adequate to grow the MVAS market to the desired level? If not, what are the additional provisions that need to be addressed under the current licencing framework?

While the current provisions seem to be adequate to the telcos while I feel after giving out the licence there is a need to include monitor whether these services are being provided in an efficient manner to the end user. Despite all the technological advancements and switching to 3G the call quality has dropped across networks. Once the licences are provided the govt. Cannot just sit back, There has to be a authority monitoring with a centralized, transparent and online feedback service where users can voice their opinions & the authority can take steps to make the licensees more compliant and to see that measures are being properly enforced. Things like Call failures, Disruption in Internet, Data Congestion in urban areas should be checked, for companies promise ideal scenarios and users generally end up in worst case scenarios. There is nothing which the users can do. Improvement in these basic things will help build a stronger foundation for MVAS. The Location Data and accuracy of at least 100m still misses in these provisions. Which should be included and be made mandatory for all licensees. Inclusion & use of location based data will open new & exciting avenues.

4.2 Is there a need to bring the Value Added Service Providers (VASPs) providing Mobile Value Added Services under the licensing regime?

Bringing the VASP's into a licensing regime will be an unproductive step. MVAS thrives on innovation & technology which keeps on changing every day with new things being introduced all over the world every day. Licensing will limit the number of companies innovating. If at all someone has a product in mind which can be of use to masses or cater to a specific segment why not let them introduce it to the market. We rather have a centralized authority which can be joined by any VAS provider at a nominal fee. The centralized authority can work on the monitoring of content being provided by the providers and regulate them if need be. This authority can provide the so called "QoS from telecom service providers"

4.3 If yes, do you agree that it should be in the category of the Unified Licence as recommended by this Authority in May 2010? In case of disagreement, please indicate the type of licence alongwith the rationale thereof.

No Comments

4.4 How do we ensure that the VAS providers get the due revenue share from the telecom Service providers, so that the development of VAS takes place to its full potential? Is there a need to regulate revenue sharing model or should it be left to commercial negotiations between VAS providers and telecom service providers?

The revenue share is something which I don't think should be regulated as different content fetches a different price & accordingly gets different revenue share from the telco. It should be left to commercial negotiations between VAS providers and telcos. Both have businesses to run and this is the most important part. Content is acquired at different cost by different entities so they should have the liberty to set the price/share as well.

4.5 At the same time, how do we also ensure that the revenue share is a function of the innovation and utility involved in the concerned VAS? Should the revenue share be different for different categories of MVAS?

It is generally seen that innovation & utility does fetch higher than the rest of the content, let the stake holders sort out the price & revenue shares.

4.6 Do you agree that the differences come up between the MIS figures of the operator and VAS provider? If yes, what measures are required to ensure reconciliation in MIS in a transparent manner?

Always. This is another case where the VAS providers are exploited to the core by the telcos and as last resort the VAS providers have to agree to the operator figures as else there is no resolution and the payments are stuck for years. VAS operators suffer from delayed payment from telcos with lot of differences in figures as well. And there is no third party to verify. Given the govt has a share in all the different price points it makes sense to have a central unit which keeps the profile & charging history of all the users. This will also help in effectively implementing transparent and highly effective charging system, which will be approved only if the user confirms. So all the issues of false charging etc can be done away with; also reconciliation of MIS could be done effectively. With the govt. keeping the money apart from the operator share, effective and timely disbursements can be made to the VAS providers as well. Having the govt. in picture will also straighten the operators.

4.7 (i) Does existing framework for allocation of short codes for accessing MVAS require any modifications? Should short codes be allocated to telecom service providers and VAS providers independently? Will it be desirable to allot the short code centrally which is uniform across operators? If yes, suggest the changes required along with justification.

Yes , Indeed a lot of modifications are required with respect to allocation of short code to VAS providers or Service Providers. In the present scenario getting a uniform short code activated at all the national level operators is one of the hardest things to do for anyone in this business. Getting approvals at multiple levels at multiple companies not only increase the time taken to finish the formalities but there are also disparities in the commercials and a lot of arm twisting does take place by telcos. Of course there is a fee charged by telcos for allotment of Short code. There are no SLA's neither are there any set of fixed rules. This hampers the smaller players in business who want to get into the market with competitive and innovative products but simply cannot afford to own a short code hence they have to effectively ride with someone else. While the efficiencies and the performances of these services are never measured. Having a central authority helps in a lot of ways. Centralizing the process clears the innovators & service providers of unnecessary hurdles & lets them focus on innovation and product improvement rather than spending hard times getting a shortcode.

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This is what the central authority should do:

1. One Time Centralized Request form asking for intent & necessary fees as security.
2. Centralized authority to review the request & to reply within a fixed number of days on whether the services should be given or not.
3. Once approved the required short code can be procured given it is not in use by someone else.
4. Centralized Authority to then instruct the telcos to create appropriate allocations in their systems to introduce the Short code within an implementable timeframe.
5. Failing to comply the telcos should be penalized.
6. Service provider should be compliant with the services it is offering, failing which services can be barred.

Uniformity in service should be the key, for a small player or big. Short code allocation should not be dependent on telcos whims and fancies.

(ii) Should there be a fee to be paid for allotment of short code?

Yes, there should be a security fee to be paid to a central authority, rather than paying individually to the telcos. Call it convenience charge if you will but people will be happy to pay if the process smoothens up. This will also ensure no unjustified products end up in the system

4.8 Is there a need to provide open access to subscribers for MVAS of their choice? If yes, then do you agree with the approach provided in para 2.46 to provide open access? What other measures need to be taken to promote open access for MVAS? Suggest a suitable framework with justifications?

Yes. Subscribers should get more of what they want rather than what the VAS managers at telcos want to shove in their faces. While the telcos have a right to put their content forward, subscribers should have an option to go out and seek other things as well. Also with this world moving to iphone/android, a lot of things have already slipped from the hands of the telco. They however continue to remain one of the access points for these services. Yes the approach in 2.46 can be a way to provide open access. Open access of MVAS is possible with creating awareness among people that alternate things exist as well apart from the operator gates. While a lot of the urban crowd are already into it, the rural areas haven't still moved from the walled gardens. The NTT DoCoMo scenario is a time tested and practical solution boosting both parties for the long term where balance is achieved by going with the operator for getting volumes at lower share or selling independently with lower volumes but larger share. Provisions should be such that operators don't block open access.

4.9 What measures are required to boost the growth of utility MVAS like m-commerce, m-health, m-education & m-governance etc. in India? Should the tariff for utility services provided by government agencies through MVAS platform be regulated?

Govt should have its own shortcode and regulated services. Most of the services being offered in india are well short of quality. The biggest problem everywhere in this industry is the maintainance of quality. There is no authority to look after that, which could make the telcos and the VAS providers answerable. Things like SMS Ad blasts have already enraged the people into thinking twice before using any service. M-commerce can proliferate only if there are SLA's, proof of authenticity and trust. People having bad experience don't want to try again as they have to go through multiple cycles of interacting with customer care to get a reversal done at the least. Increasing awareness by use of different mediums like TV, Newspapers for services such as health, weather, Alerts, governance can be provided by govt at no cost at all. Things like weather for instance should be a free service on the govt. shortcode. Make people understand how to use the service and once you get people hooked to one service they won't hesitate in using another if they find value, and if they find value they won't mind using paid services as well. M-health & m-education are a bit farfetched as there has to be ground level implementation and operation of some sorts to really kick these services off. So unless there are basic things in place it is thinking too much.

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Of course in the coming times increased connectivity might help in establishing teacher free schools. M-education can only be successful if it is driven in local language which is a hindrance currently and should be researched more into.

M-Health may provide basic information about a lot of things but again you need someone at the ground level to understand and implement. M-governance will be incomplete without location based services. While it will play a pivotal role for security agencies, each and every vehicle can be made traceable. Be it trains, buses etc. Live updates can be provided, making everything more transparent & answerable. People can access this info on web/mobile or at the bus stop or the train station. This will improve efficiency, hence performance. The use is limitless.

On another note NFC based payment systems should be supported across all operators if m-commerce is to be given boost. If NFC is made mandatory by say 2015-2016 in all handsets things should shake up in this arena & it will truly give mobile payments a push also providing a common man unable to hold a bank account with a mechanism to be a part of the payment network thereby more reliance on credit than cash. Hence more and more transactions come under the purview of govt. Helps in the ID system as well with a single chip acting as your driving license, ID, Wallet etc.

4.10 Any other suggestions with reasons thereof for orderly growth of mobile value added services?

People will consume quality services. So an Authority is required to keep a leash on the telcos & vas providers, thinking in long term it makes sense to have a centralized authority to keep a check on all the services coming under the purview. These services essentially will become a part of daily life and will help increase the productivity of people of india. We need to correct the basics and get them right. #Call Quality #Data Access, User needs to get what is promised not a 256 kbps named broadband. Quality, Utility & accessibility of service are the key to growth. Steps need to be taken with future in mind so that they are flexible enough to accommodate the next incoming wave of technology.

TO SUM UP

1. Setup a National Authority to look into and maintain quality of services this sector both telcos & VAS providers.
2. Centralized Short Code Allocation.
3. Centralized Charging gateway affiliated to the govt. for
 - Reconciliation between telco – vas provider
 - Timely payments to vas providers
 - False charging reduced with user confirmation required to start service.
 - M-Commerce & M-payments will be boosted
4. Centralized Location Data server where any user in country can be tracked to 100m accuracy.
5. Govt. Short code for various MMP's & E-governance initiatives.
6. NFC chips to be made mandatory in all handset by 2016.
7. Research & Development / Incubation centre for emerging mobile technologies & services.

For Clarification, Further discussions & Questions

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