

Comments on Consultation paper by:

Amarnath Ojha

Shashank Shekhar Agarwal

Mayank Negi

Zafar Iqbal

Question 1: Whether TRAI should prescribe any format for publishing tariff?

Please support your answer with rationale.

Comment: Yes. There is a need for uniformity in the way tariffs are published by different service providers to make it easier for user to compare between different service providers and also compare between different packages provided by each.

Question 2: If the answer to the Question 1 is yes, then please give your views regarding desirability of publishing tariffs on various modes of communication viz., TSP website/Portal, App, SMS, USSD message, Facebook, WhatsApp, Twitter, Customer care centers, Sales outlets etc. If the answer to the question is that tariffs should be published on multiple channels as above, please state whether TRAI should prescribe a separate format for each channel. Please also suggest the essentials of the format for each channel.

Comment:

Yes. It should be as follows:

For USSD message, SMS:-

TRAI can look into prescribing a standard format for some modes such as SMS, USSD message; as there is less scope for visual appeal and it is more of an information communication tool only.

For Facebook, Twitter, WhatsApp:-

Since these are more intuitive modes of communication, service providers be given freedom to market at other modes so as to suit their marketing needs. However, there should be some basic info prescribed by TRAI which should mandatorily be highlighted as part of the communication, over and above which service providers can add as per their wish.

Question 3: Whether the extant format prescribed for publishing tariff at TSP's

website conveys the relevant information to consumers in a simple yet effective manner? If no, please provide the possible ways in which the same can be made more effective?

Comment: No. Though the TSPs should have marketing freedom to sell their plans as per their choice, but the consumer is sometimes unable to comprehend the terminologies used by different TSP's on their websites and fails to choose a correct plan. For example, BSNL uses "SPV", "STV", ON-Net, OFF-Net etc. ; Jio uses "FUP" ;Vodafone-Idea uses "All Rounder Packs".

Making provision for a "Comparison Tool" which will compare the tariffs of TSPs , to be made available on websites of each TSP.

Question 4: Whether the service providers be required to publish all the tariff offerings and vouchers in addition to the publishing of tariff plans, in the prescribed format? Please provide rationale for your response.

Comment: No. Providing a prescribed format for all tariff offerings and vouchers will be difficult as such vouchers may be one of its kind and providing a format for all such new products simultaneously would be practically difficult. It may also curb the freedom to innovate for the service providers, who may wish to market the product in a completely novel manner to catch user attention.

Question 5: Whether there is a need to mandate TSPs to introduce a tariff calculator tool to convey the effective cost of enrolment and continued subscription? If yes, what can be the essential features of such a tool? If the answer is in negative, then please give reasons for not mandating such a tool.

Comment: Yes. A tariff calculator tool would help a user to choose a plan tailored to his/her needs and at the same time it will also help service providers to analyze the requirements of the users and design their packages based on the input data received. Such a tool should have:

- Take inputs from user of his daily, monthly or annual requirements to suggest the best pack for the user
- Should calculate per day cost for calls(national/international) and data usage for each pack he/she is offered so that he can decide the best pack.
- Should give the details of tariff as call minutes/Rs and data/Rs, for such plans.

Question 6: Whether the service providers be asked to disclose clearly the implications of discontinuation of tariff plan after expiry of mandatory tariff

protection period of six months on the provision of non-telecom services offered as a part of the bundle at the time of subscription to a particular plan? If yes, what should be the exact details that service providers may be required to provide in case of bundled offerings? If the answer is in negative, then please give reasons for not mandating such a disclosure.

Comment: Yes. Service providers should give the exact details whether non-telecom services would continue after six months' subscription or not. Also if it will be continued user should also be informed whether it will be free of cost or not. He should also be informed of the charges to be paid in case the non-telecom service becomes chargeable.

An awareness campaign by TRAI regarding non-Telecom services, hidden T&Cs will be helpful for most people.

Question 7: Whether the service providers be required to provide a declaration while reporting tariffs to TRAI and displaying tariffs through its various channels that there are no terms and conditions applicable to a tariff offering other than those disclosed here? Do we require additional measures to ensure that all the terms and conditions are clearly communicated to the subscribers and the Authority? If the answer to the above is yes, then please provide your suggestions in detail. If you do not agree with the above requirement, please provide detailed reasons for the same.

Comment: Yes. A declaration should be provided. Some additional measures like:

T&C should be on a common format, In Vernacular languages too and in the form of Frequently Asked Questions(FAQs)

Question 8: Whether the service providers be required to publish details of all plans in the prescribed format including the plans not on offer for subscription but active otherwise? Please support your answer with rationale.

Comment: Plans details should be published in a prescribed format as some of the plans do not spell out all the charges and cost to be incurred by the user. A prescribed format would help the user to compare all the plans across all service providers in a single glance.

For not on offer yet active plans a prescribed format may not be provided. But the details of such plans should be provided separately on a different tab so that the current users can check their current entitlements.

Question 9: Whether the service providers be required to update the information on point of sale and retail outlets simultaneously with the launch/change of a tariff offer?

Comment: Company owned customer care centers and other bigger retail stores should update the information simultaneously with change of tariff order. They can have a kiosk to showcase all the existing ongoing updated plans.

Other small common retail outlets may have a fixed time period, say 1 week, within which they should the information of a change in tariff order. Also the retailers be informed electronically and telephonically about the change, so that the same can be communicated to the customers.

Question 10: Whether the tariffs published in prescribed formats are displayed on websites of the service providers in an effective manner? If no, should the manner of display on website may also be prescribed by the Authority? If it is felt that the manner of display on website may be prescribed by the Authority, please give your views on the proposed display framework.

Comment: No, the tariffs are not published in an effective manner and some service providers like Airtel only provide tariff information upon entering one's phone number. This makes it difficult for a new user to see the tariff rates of Airtel and thus leaving him unable to compare the tariff rates of his current service provider. Moreover, as mentioned in comment to the Question 3 above, TSPs uses terminologies which are not used in common parlance and hence makes it complicated for a user to make an informed choice.

Question 11: What are your views on introduction of concept of unique id and requiring the service providers to link the tariff advertisements etc. with

corresponding tariffs published in TRAI prescribed formats including requirements to publish dates of implementation of tariff and that of reporting of tariff. Do you think that any other safeguards need to be introduced? If yes, please elaborate. Please support your answer with rationale.

Comment: Concept of Unique id is a welcome step. This will ensure the accountability of the service providers with respect to reducing the time lag between publishing dates of implementation of tariff and that of reporting of tariff. Also this will allow TRAI to keep a tab on all the tariff ads and check that they are provided in the prescribed format.

Question 12: Whether the proposed monitoring and compliance mechanism is enough to deter any violation of compliance with applicable regulations/directions. If no, please suggest further safeguards that may be introduced to ensure a robust monitoring and compliance mechanism.

Comment: The proposed monitoring and compliance mechanism is a robust one and would certainly help in reducing the violation of compliance with directions. But to deter any violation not only strict monitoring will be required but also some penal action too needs to be taken to create deterrence.

Penal action could be a monetary fine which can be graded to increase in value for subsequent violations.

Question 13: Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

Comment: Postpaid tariff rates too should be focused upon as many a times some hidden charges are charged from the customer without their knowledge. This is also not explicitly mentioned in the bill and hence keeps on paying it repeatedly.