

**Bharti Airtel Ltd.**

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Ref No: RP/ FY 17 – 18/ 062/ 561

Dated: December 10, 2018

To,  
Shri Kaushal Kishore,  
Advisor (F&EA-II),  
Telecom Regulatory Authority of India,  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg, Old Minto Road,  
New Delhi – 110002.

**Subject: Consultation Paper on 'Review of Extant Provision for Sending the Printed Bills to Consumers of Landline and Post Paid Mobile Subscribers'.**

Dear Sir,

This is with reference to your above mentioned consultation paper. In this regard, please find enclosed our response for your kind consideration.

Thanking You,

Yours' Sincerely

For **Bharti Airtel Limited**

A handwritten signature in blue ink, appearing to read 'Ravi P. Gandhi', is written over a horizontal line.

**Ravi P. Gandhi**  
**Chief Regulatory Officer**

Encl: a.a.

## **Bharti Airtel's Response to TRAI's Consultation Paper on "Review of Extant Provision for Sending the Printed Bills to Consumers of Landline and Post Paid Mobile Subscribers"**

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Bharti Airtel welcomes the opportunity to comment on the TRAI consultation paper on 'Review of extant provision for sending the printed bills to consumers of landline and Post paid Mobile subscribers'

Our issue wise response has been given below:

**Q.1 As per the extant provision of TTO (46th Amendment), provision of hard copy of the bill or printed copy of the bill to postpaid subscribers is mandated as a default option. Is there a need to change the extant default option, i.e., provision of paper bill without any charge to postpaid subscribers of Wire line and (ii) Mobile services? Kindly support your answer with rationale. And**

**Q.2 As against the existing practice of issue of printed bill to postpaid subscribers of (i) Wireline and (ii) Mobile service, unless a subscriber opts for electronic-bill (ebill), should e-bill now be made the default option? And if so, why?**

### **Bharti Airtel's Response:**

At the outset, we would like to appreciate the rapid pace of the Government in its journey towards creating a digital India. In this context, the introduction of the default option of E-bill for postpaid and fixedline subscribers would act as a much needed boost to the measures taken by the Government for creating a digital and paperless economy. Also, there is a push toward digitalization of processes in telecom sector such as SACFA approvals and the DoT has also been largely mandating the receipt of payments by electronic means.

We believe that E-Bill should be made as default option in place of the current default option of issuing hard copy of the bills to postpaid and fixedline customers. This recommendation is relevant in the current scenario as the handset eco-system and Internet penetration have improved significantly. There are 481.70<sup>1</sup> million broadband subscribers who can access Internet through handheld or fixedline devices. In terms of the handset ecosystem, 71%<sup>2</sup> of our entire postpaid subscriber base is using smart phone, using which these customers can access bills through mobile apps, websites, E-bill modes, etc. Also, we have been witnessing a trend among the new customers where they are increasingly opting for the e-bill option instead of the paper bill. As on 31.10.2018, 89% of the new postpaid mobile customers and 97% of the new fixedline customers opted for e-bill as their default

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<sup>1</sup> TRAI's Telecom Subscription Data as on 30th September, 2018

<sup>2</sup> Postpaid subscriber base as on 31.10.2018

option. Majority of new customers are opting for e-Bills, as it is more convenient and accessible for them.

In addition, it is also proposed that the summary of bill be sent through M-Bill SMS to all customers, which would contain information like, Total Due, Previous Balance, Current Month Due and Due Date. Further, M-Bill SMS will also provide an option to see additional details such as Monthly rental, Usage, and Taxes. Therefore, M-Bill SMS would ensure that all customers who do not have e-mail facility (including feature phone or fixed-line users) gets bill details.

Further, by printing paper bills for 17.25 Million postpaid customers, we are consuming 51.75 million paper sheets per month. In order to promote a sustainable environment, this practice needs to be stopped as it leads to cutting of thousands of trees for generating paper bills for the customers. **In view of above, we recommend that e-bill mode be made the default option for postpaid and wireline customers.**

**Q.3 If e-bill is made default option then how the bills would be made available to Postpaid subscribers of (i) Wireline and (ii) Mobile services with (a) Subscribers of Feature phones and (b) Subscribers who do not have e-mail facility.**

**Bharti Airtel's Response:**

In case, the e-bill is made as the default option, it can be made available to the postpaid and fixedline customers in the following ways;

- (i) **Mobile Subscribers using Feature phones with no e-mail facility:** For customers using feature phones with no e-mail facility, as submitted above that the summary of bill will be sent through an M-Bill SMS, which would contain necessary details such as:
  - a) Total Due:
  - b) Previous Balance:
  - c) Current Month Due:
  - d) Due Date:
  - e) Select option no. for details:
    - 1. Monthly rental;
    - 2. Usage;
    - 3. Taxes;
  
- (ii) **Wireline Subscribers with no e-mail facility:** over 97% of the wireline customers are either broadband customers or business customers and it is more likely that they have access to email facility. However, in case a wireline customer does not have an email

facility, the bill summary will be sent through an M-Bill SMS as explained above on the customer's registered mobile number with the operator.

In addition to the above mentioned measures, if a postpaid or fixedline customer still requires a hard copy of the current bill, then they can request for the same through SMS, Customer Care or by visiting the nearest Airtel store.

**Q.4 If a subscriber opts for e-bill and requests for change the option to printed bills, will there be a charge for providing the printed bill? Kindly provide reasons for your answer.**

**Bharti Airtel's Response:**

We are of the view that there should be no charge when a subscriber who has opted for e-bill requests changes his/her preference to printed bills. Currently as well, in order to support the customers who have opted for e-bill, we do not charge them when they request for the current bill cycle's paper bill.

**Q.5 What could be the safeguards for subscribers who do not wish electronic bills and prefer to get printed bills?**

**Bharti Airtel's Response:**

In case the customer does not wish to subscribe to the e-bill facility and prefers only the printed bills, then such request would be fulfilled without any charges. The customer can place his or her change request through following modes;

- (i) SMS to toll-free short-code;
- (ii) Missed Call Number;
- (iii) Airtel App or Website; and
- (iv) Airtel Stores or Call Center/E-Mail

On account of the above mentioned measures, there would be potent safeguards for subscribers who do not wish to receive electronic bills and prefer printed bills instead.

**Q.6 TRAI has mandated specified set of information to be printed on bills to postpaid subscribers. If the printed bill is not issued, then how the specified set of information will be conveyed to subscribers? Should the same be mandated for e-bills also? Kindly support your comments with justification.**

**Bharti Airtel's Response:**

Currently, our E-Bill and paper bill have the same set of information and there is no difference between the two. All mandated information is being provided through E-bills. Therefore, customer can use their E-Bill as an original invoice, which would contain all mandatory information.

**Q.7 Any other issue relevant to the subject discussed in the consultation paper may be highlighted.**

**Bharti Airtel's Response:**

No Comments.

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