

RSM/COAI/2018/150

July 26, 2018

Sh. Kaushal Kishore,
Advisor (F & EA),
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi – 110002

Subject: COAI Response to TRAI on draft “The Telecommunication Tariff (sixty fourth amendment) Order, 2018”

Dear Sir,

This is with reference to the TRAI draft “The Telecommunication Tariff (sixty fourth amendment) Order, 2018”, released on July 09, 2018.

In this regard, please find enclosed COAI response to the draft Regulation.

We hope that our submission will merit your kind consideration and support.

With Regards,

Yours faithfully,

Rajan S. Mathews
Director General



**COAI comments on
The Telecommunication Tariff (sixty fourth amendment) Order, 2018
Released on July 09, 2018**

At the outset, we thank TRAI for coming up with the amendment to the TTO with the objective to purge the infructuous/ redundant regulations.

As highlighted in the explanatory memorandum of the TTO, COAI was one of the member of the Committee constituted to purge the infructuous Regulations and was also part of the sub-Committee on Tariff Related Issues.

COAI made various submission in the sub-Committee meetings. We would like to reiterate some of our submissions on key issues which we believe should be part of the said TTO:

1. Deposits:

Section III- Clause 5:

- a. TRAI vide the draft TTO (64th Amendment) w.r.t deposits has proposed following to be incorporated:

“Unless otherwise provided for, no service provider shall seek or obtain from any subscriber in any form any amount as deposit for any telecommunication service in excess of one year’s rental chargeable from the subscriber for the particular telecommunication service”

- b. We are of the view that this clause should not be applicable for the subscribers using the International roaming/ISD services. As the Security Deposit is to safeguard the TSP from financial exposure and should not be compared to the yearly or monthly rental, but the same depends on the usage by the subscriber.
- c. Thus, this clause should not be applied for the ISD/International Roaming.

2. Minimum tariff protection of six months should be changed to three months.

Section -III Point 6(v)

- a. Presently, over 95% of mobile consumers are prepaid consumers and majority of them are availing Special Tariff Vouchers (STVs) / Combo Vouchers (CVs) at any given point of time to avail better / discounted tariffs as per their usage requirements.

- b. These vouchers can have maximum validity of 90 days and most of the users use vouchers having 28 days / lower validity vouchers. However, in case, consumer has recharged with greater than 90 days validity voucher incl. Life time validity (LTV) plans, tariff protection will be given up to the validity committed in such recharge voucher.
- c. We are of the view that the 90 days tariff protection will also be consistent with 90 days network locking period specified under MNP regulation. The plan vouchers are currently being provisioned as a base plan for charging fall-back rate (base rate) in case if validity / benefits of existing voucher have been expired and consumer has recharged after expiry of validity period to continue to avail such benefits. Such cases are very miniscule as consumer is fully aware about recharge process and do recharge as per his/her usage requirement.
- d. Thus, we request the Authority to kindly change the minimum tariff protection of six months to 3 months.**

3. Quarterly tariff compliance w.r.t bulk customers should be done away with / or should be made as a part of yearly TRAI compliances.
Section -III Point 7(i)

- a. This compliance has been submitted every quarter since year 2006, and TRAI has never published any data basis the information collected vide this order. Further, no market failure has been observed in bulk customers segment.
- b. Thus, this clause should be purged.**

4. Tariff Ceilings specified for National Roaming tariffs should be abolished and should be left to market forces.
Section-III, point no 6 (x)

- a. Indian telecom market is progressing towards consolidation and will have 3-4 large players whereas ceiling was specifically put to protect the interest of small/ regional players.
- b. Incumbent TSPs have already withdrawn national roaming charges making tariff at par with home tariffs without any regulatory intervention.
- c. Several roaming tariff offers are independently available for consumer to opt basis his/her usage requirements.
- d. Thus, Tariff Ceilings specified for National Roaming tariffs should be abolished and should be left to market forces.

- e. Further, in case a particular plan is mandated by TRAI the same will not be counted in the tariff capping of 25.

5. Publication of tariff information in national and vernacular language newspaper after every six months should be removed.

Sec IV, point no 9 (i)

- a. Service providers are required to publish all tariff plans in a service area for prepaid and postpaid subscribers in the prescribed format in one regional and one English newspaper at an interval not more than six months.
- b. In this respect, COAI had been requesting to TRAI that this practice needs to be discontinued, as the same does not serve the purpose as the tariff plans are dynamic and frequently revised.
- c. Further, information of the Tariff Plans is advertised and are available on TSP's website and Apps.
- d. Also, mandatory Publication of Tariffs in the newspapers every six months which is unnecessary cost burden on the TSPs. Thus, the said Direction needs to be purged.
- e. The Authority had found merit in the suggestion of discontinuing the direction for publication of tariffs in NEWS PAPER as acknowledged in the explanatory memorandum of the 63rd Amendment to TTO. **TRAI had further submitted that Direction on publication of Tariff Plans dated 16th Jan 2012 is being withdrawn separately.**
- f. Thus, we again request TRAI to kindly withdraw the said Direction.

6. Talk Time voucher with the denomination of rupees ten and multiple thereof: Schedule II – CMTS -6(a)

- a. This provision need to be reviewed considering changing market dynamics. Presently tariffs are offered mostly as bundled package having consolidated charges for data services with complimentary / unlimited voice and SMS.
- b. Moreover, the details of such tariffs along with T&Cs are being communicated transparently through various communication channels incl. POS, Website, Mobile App etc. **Therefore, flexibility should be there to use the denomination of ten and multiple of ten for STVs and Combo vouchers also in addition to talk time vouchers.**

7. **Processing Fee on talk time voucher:**

Schedule II – CMTS - 6(e)

- a. Currently the processing fee on talk time voucher is 10% of MRP or Rs 3 whatever is lower. **Such restrictions should be removed for free play of the market. TSPs should be allowed to offer more attractive Top-up vouchers, bringing full value to consumers telecom spend.**

8. **M-bill or E- bill can be considered as default option for post-paid billing replacing of hard copy.**

Schedule II- CMTS, 7A- Forty Sixth Amendment

- a. TRAI has highlighted in the draft TTO that the recommendation of the Committee to introduce option of “opt-in” by the subscriber for hard copy of the bill, if so required, is being deliberated through a separate consultation process.
- b. In this regard, we take this opportunity to reiterate that the introduction of default option of mobile bill or e bill for the post-paid subscribers would provide a much-needed boost to the Government of India’s efforts towards digitalisation.
- c. On this aspect, we are enclosing our earlier submission as Annexure – 1 for the consideration of the Authority.

9. **DLC tariffs ceiling should be removed and let market forces to decide the tariffs.**

Schedule IV

- a. There has been significant decline in the transmission cost coupled with rapid technological advancement of Backhaul from PDH–SDH–DWDM. (Plesiochronous digital hierarchy - Synchronous Digital Hierarchy - Dense Wavelength Division Multiplexing)
- b. There has been reduction in fibre pair utilization, replacement of traditional microwave network with hybrid microwave / SDH network.
- c. Further, there has been remarkable increase in supply and demand of DLCs due to intense competition, advancement of transmission technologies (MPLS-VPN) and reduction of transmission / optical.
- d. Also, equipment costs which has led to reduction in per unit cost of providing DLC resulted into higher operational efficiency and availability of higher discounts on ceiling tariffs.
- e. Thus, DLC tariffs ceiling should be removed and let market forces to decide the tariffs.

10. Tariff for Short Message Services sent by persons other than a telemarketer registered under regulation 14 or an entity sending transactional message.

Schedule XIII

- a. With the advent of OTT based messaging applications, SMS services are not being used extensively by the normal consumers which has severely impacted the business viability.
- b. Hence, TRAI should completely do away with the floor of 50p/SMS.



Association of Unified Telecom Service
Providers of India
B-601 Gauri Sadan, 5 Hailey Road
New Delhi – 110001.
Tel: +91-11-23358585/8989
Fax: +91-11-23327397
Email: auspi@auspi.in
Web: www.auspi.in

COAI
14 Bhai Veer Singh Marg
New Delhi – 110001.
Tel: +91-11-23349275
Fax: +91-11-23349276/77
Email: contact@coai.in
Web: www.coai.in

JAC/2017/007

February 28, 2017

Shri Sudhir Gupta,
Secretary,
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Bhawan,
New Delhi- 110 002

Subject : Introduction of M-Bill enabling replacement of hard copy of mobile bill as default option for postpaid subscribers

Reference : 1) Joint Industry letter no JAC/2016/069 dated 25.5.2016
2) Meeting held in TRAI on 27/7/2016
3) Joint Industry letter no JAC/2016/110 dated 22/8/16
4) Joint Industry letter no JAC/2017/003 dated Jan 17, 2017(Copy enclosed)

Dear Sir,

This is with reference to above mentioned letters on the issue of replacement of hard copy of bill with M-bill or E-bill as the default option for postpaid subscribers.

Government of India has embarked upon the mission towards Digital India. The mission has gained the much required momentum due to Government efforts for cashless transactions after the demonetization exercise. The availability of affordable smart phones has also provided a much needed boost. For telecom sector, the digital transactions are being encouraged. For example, eKYC route for subscriber verification and online payments of Government fees through Bharat Kosh project have been implemented recently. In this context, the introduction of default option of mobile bill or e bill for the postpaid subscribers would provide a much needed boost to the Government of India's efforts towards digitalisation.

The M-bill option has been worked out for such customers who may not have the email account for receiving the telephone bill. The features of the M-bill are:

- The M-bill would contain all the relevant fields required by the customer for verification of the bill. (Refer Annexure I).

- The M-bill SMS would also contain a link to open HTML page. This will enable the user to get the bill details on HTML page.
- For subscribers with no data connectivity, SMS service can be provided. This SMS shall provide the same details as available on the link.
- The HTML link in the SMS will have one more link, through which the complete bill details would be available and can be saved in the pdf format.
- With the introduction of M-bill, we can provide paper less option to receive the telephone bill for all the categories of postpaid customers as reflected in enclosed Annexure II.
- Besides, for initial 2 months both E-bill/M-bill as well as hard copy can be given to consumers. Also, consumer would have option to opt-out of M-Bill, if not interested.

M-bill is not only an environment friendly solution, it will also help in operational cost optimization for the telecom service providers. These options will provide the much needed support to the Government's policy objective of Digital India as well. At present, the 46th amendment to the telecom tariff order mandates service providers to provide a hard copy of the bill by default to the customer. There is no provision to provide the customer the default option of paper less bill in terms of E-bill or M-bill.

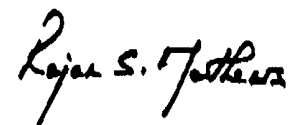
With the introduction of M-bill as another option for paperless billing, it is requested that the extant 46th TTO may be amended so that M-bill or E- bill can be considered as default option for postpaid billing.

Thanking you,

Yours faithfully,



Ashok Sud
Secretary General
AUSPI



Rajan S. Mathews
Director General
COAI

Cc: Shri. S.K. Mishra, Pr. Advisor (F & E.A)
Smt. Vinod Kotwal, Advisor (F & EA)

Enclosures : As above

Annexure I:

The following fields can be shown in a mobile bill:

- (i) Mobile number
- (ii) Bill period
- (iii) Bill date
- (iv) Due date
- (v) Monthly rental
- (vi) Usage charges
 - (a) Call charges
 - (b) VAS
 - (c) Internet usage
 - (d) Roaming
- (vii) Taxes
- (viii) Total monthly usage ;
- (ix) Over due amount;
- (x) Late payment charges;
- (xi) Total due
- (xii) Last payment

The sample SMS will be as follows:

*“Bill for 9910030098: Bill Date: 09-Dec-16, Due Date: 27-Dec-16. Prev Due: Rs (-160.25)
Payment: 0; Total Due: Rs 1679.27; This month bill: Rs 1839.52; Rental: 1599 ; Usage: 0.59 ;
Tax: 239.93 ; For details click www.xxxxx.in/ccm/?p=m “*



As shown above, the SMS will contain a link to open HTML page. On clicking this link, the bill details will open as HTML page. The sample HTML page is as under :

Mobile No	9910030098
Bill No.	xxxxxxx
Bill date	9-Dec-16
Due date	27-Dec-16
Bill Period	8-Nov-16 to 7-Dec-16
Pervious due	-160.25
Payment	0.00
Late payment fee	0.00
Adjustment	0.00
This month charges	1839.52
Amount due before due date	1679.27
Amount due after due date	1779.27
Monthly Rental	1599.00
Usage	
Voice Call	0.00
SMS	0.00
Internet usage	0.09
Roaming	0.50
Tax	239.93

Annexure II:

Paper less bill options available to customers

Sr no	Category	Bill Option 1(email)	Bill Option 2(M-bill)	Remarks
1	Customers with e mail address, smart phone and data connection	√	√	Both the options available to the customer.
2	Customers with smart phone and data connection (no email)	x	√	Customer can download the bill over his phone also.
3	Customers with e mail, feature phone and data connection	√	√	Since the HTML page is a simple page, customer can view the data over phone also.
4	Customers with feature phone, data connection and no email facility	x	√	Since the HTML page is a simple page, customer can view the data over phone also.
5	Customer with feature phone and no data connection	x	√	

Association of Unified Telecom Service
Providers of India
B-601 Gauri Sadan, 5 Hailey Road
New Delhi – 110001.
Tel: +91-11-23358585/8989
Fax: +91-11-23327397
Email: auspi@auspi.in
Web: www.auspi.in

COAI
14 Bhai Veer Singh Marg
New Delhi – 110001.
Tel: +91-11-23349275
Fax: +91-11-23349276/77
Email: contact@coai.in
Web: www.coai.in

JAC/2017/003

January 17, 2017

Sh. S.K. Mishra,
Pr. Advisor (F & E.A),
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Road,
New Delhi -110002

Subject: : Introduction of M-bill - replacing hard copy of telephone bill with Mobile Bill (M-bills) or E-bill as default option for postpaid customers

Reference: 1) Joint Industry letter no. JAC/2016/069 dated 25.05.16 (Copy enclosed)
2) Meeting held in TRAI on 27.07.2016
3) Joint Industry letter no. JAC/2016/110 dated 22.08.16 (Copy enclosed)

Dear Sir,

This is with reference to our above referred letters on the issue of replacing hard copy of telephone bill with Mobile Bill (M-bills) or E-bill as the default option for postpaid customers.

Recently, the Government of India has stepped up its efforts for the transformation towards Digital India. In order to facilitate the demonetization drive, cashless payments through Mobile wallets, USSD platform and UPI are being promoted. Digital acquisition of subscribers on Aadhar based eKYC platform has been permitted for mobile subscribers through paper less route. The handset ecosystem for smartphones has improved significantly as the smartphones with 4G capability are available. On the lines of transforming towards Digital India, the introduction of default option of Mobile bill or e-bill for the postpaid subscribers would provide a much needed boost to these measures by the Government.

As explained in our earlier letter, Mobile bill would be sent through SMS and would contain the relevant fields by which the customer can verify his bill. The following fields can be shown in a mobile bill:

- (i) Mobile number
- (ii) Bill period
- (iii) Bill date
- (iv) Due date
- (v) Monthly rental
- (vi) Usage charges : (a) call charges (b) Vas (c) Internet usage (d) Roaming
- (viii) Taxes
- (ix) Total monthly usage
- (x) Over due amount
- (xi) Late payment charges
- (xii) Total due
- (xiii) Last payment

The sample message will be as follows:

Bill for 9910030098: Bill Date: 09-Dec-16, Due Date: 27-Dec-16. Prev Due: Rs (-160.25)
 Payment: 0; Total Due: Rs 1679.27; This month bill: Rs 1839.52; Rental: 1599 ; Usage: 0.59 ;
 Tax: 239.93 ; For details click www.xxxxx.in/ccm/?p=m</messageBody> or SMS M-bill to XXX
 (Common code across the service providers).

As shown above, the SMS will contain a link to open HTML page. On clicking this link, the bill details will open as HTML page. For subscribers which are not having data connectivity, SMS service can be provided. This SMS shall provide the same details as available on link.

The sample HTML page is as under:

Mobile No	9910030098
Bill No.	xxxxxxx
Bill date	9-Dec-16
Due date	27-Dec-16
Bill Period	8-Nov-16 to 7-Dec-16
Pervious due	-160.25
Payment	0.00
Late payment fee	0.00
Adjustment	0.00
This month charges	1839.52
Amount due before due date	1679.27
Amount due after due date	1779.27
Monthly Rental	1599.00
Usage	
Voice Call	0.00
SMS	0.00
Internet usage	0.09
Roaming	0.50
Tax	239.93

The HTML link in the SMS will have one more link, ([To view bill click here](#) <Download pdf>) through which the complete bill details would be available and can be saved in pdf format. The HTML link will be a light, easy to open link, which can be opened in a 2G GPRS phone as well. The Mobile bill demonstration can be arranged if required. We can also provide link in the html page for the customer so that he can directly make payments online using various modes.

This will prove to be a boon for Government objective of increasing the cashless transactions as well.

Thus, Mobile bill can function as a convenient digital option for the postpaid subscriber. As highlighted in our previous letter, M-bill or E-bill should be the default option for postpaid subscribers. M-bill will enable anytime, anywhere access to bill summary and downloading at customers' convenience without any cost impact. M-Bill will contain necessary billing details which is primarily required by customers. In case, customer require detailed bill, then customer can download E-Bill through email/ website or customers can get printed copy of bill through designated sources at marginal cost.

M-Bill is an environment friendly solution which offers convenience to customers, cost saving to TSPs and environmental saving for all stakeholders. Also, we would like to highlight a fact that M-bill or E-bill will definitely support the Government's policy objective of 'Digital India' by making paperless billing communication to customers.

In view of above, we would like to request that M-bill or E- bill should be considered as a default option at the earliest.

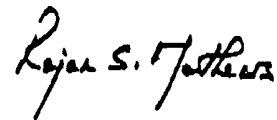
It is requested that 46th Amendment to telecom tariff order should be revised in line with our above submissions.

Thanking you,

Yours faithfully,



Ashok Sud
Secretary General
AUSPI



Rajan S. Mathews
Director General
COAI

Cc: Smt. Vinod Kotwal, Advisor (F & EA)

Enclosures : As above