



**December 10, 2018**

**Comments on Consultation Paper on review of extant provision for sending the printed bills to consumers of landline and Post paid Mobile subscribers**

*Q1. 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.*

No. According to the paper, bills only concern less than 5% of total mobile subscriber base (only postpaid subscribers) apart from majority of landline subscribers. Therefore issuing printed bills should not be a concern. In light of the fact that a sizeable population in India uses feature phones, does not have access to internet, and is not very e-savvy, it is necessary that hard copy of bills are provided. Over billing appears to be an issue as per TRAI's survey and it should be recognized that bills (in understandable, printed form), with details, are an important document for consumers to argue their case.

We appreciate the fact that use of papers is an environmental concern and needs to be addressed. For this, service providers may do a proper study to understand consumers' preference to bills and reasons thereof, before considering any further steps. Amending the regulations at this stage will be premature.

In the meantime, service providers may continue to actively sensitize the public on paper use, may give e-billing as an option to new subscribers and encourage them to choose the same by offering incentives.

*Q2. 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 (e-bill), should e-bill now be made the default option? And if so, why?*

No. The present regulations should continue, considering the points mentioned in response to Q1. In addition, it is an acknowledged fact that even today, consumers prefer to track their expenses on printed bills. In such cases, it will not be fair on consumers to expect them to spend on taking copies of e-bills.

*Q3. 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.*

NA

**Citizen consumer and civic Action Group (CAG)**

New #246 (Old #277B), TTK Road (J.J. Road)

Alwarpet, Chennai 600 018 INDIA

Ph: +91 44 2499 4458/ 2466 0387



*Q4. 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.*

No. It should be recognized that if a subscriber, who had earlier opted for e-bill, chooses to change the option to printed bills, it should be because of some problem that he/she had encountered or there was a need. In such situation, if a cost is imposed, it will only be an additional burden on the consumer with benefit to the service providers.

Moreover, when there is a need and if a charge is levied to “deter” the subscriber from wasting paper, the consumer is anyway going to get the bill printed from an external source. In such a scenario, environment will be affected regardless of the charge imposed.

*Q5. What could be the safeguards for subscribers who do not wish electronic bills and prefer to get printed bills?*

Consumers should continue to receive printed bills with no costs, if he/she so prefers.

*Q6. 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.*

Yes, the same specified set of information, mandated by TRAI for printed bills, should be mandated for e-bills also. As mentioned earlier, detailed bills are essential for consumers to understand usage and contest, if needed, and therefore, be it printed bills or e-bills, details must be the same.

*Q7. Any other issue relevant to the subject discussed in the consultation paper may be highlighted.*

As is the practice of e-billing adopted by other utilities in India like the credit card companies, electricity departments and regulatory commission, mutual funds, printed bills should always be the available option to consumers. In parallel, service providers, may actively provide incentive to consumers for switching to e-bills.