



CAG

Citizen consumer and civic Action Group

26.12.2019

Comments to the Consultation Paper on transparency in publishing of tariff orders

Please find here-below our comments to the Consultation Paper:

Question 1: Whether TRAI should prescribe any format for publishing tariff? Please support your answer with rationale.

Yes, it is important for TRAI to prescribe a format for publishing tariff.

The nature and composition of tariffs, the frequent change in them, along with various offers, etc. often make it very difficult for consumers to make informed decisions, especially when there is lack of transparency in disclosure of information. Therefore, it is necessary for the regulator to step in and provide a format which is simple and transparent for consumers.

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.

Publishing tariffs through various modes of communication is a good idea and in our opinion, the same format, which is simple and easy to comprehend, should be used so that it is easy for consumers to understand. Multiple formats may lead to confusion.

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?

Telecom Service Providers should provide complete information as regards all associated terms and conditions applicable to tariff in a simple manner. Details of existing plans should also be made available.

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.

Yes



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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.

It would be good to have the tool as this will help consumers to make informed decisions. It will help them to know the entry and running costs of the plan they choose. For consumers from rural areas, who may not be familiar with usage of the tool, information using the tool, could be communicated by the service provider.

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.

Yes

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.

Yes, this will improve transparency. Misleading information or hidden information is construed to be an unfair trade practice as defined under the Consumer Law.

Additional measures are not needed for now. Later, if the situation doesn't change, we can consider other ways by which disclosure could be mandated.

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.

Yes.

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?



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Yes.

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.

TRAI may prescribe the format which should be simple and clear. Prompt update of information is required for consumers

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.

Yes, it is important for 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.

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.

This is fine for now.

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