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Mr. Kaushal Kishore
Advisor (F&EA-I)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan (next to Zakir Hussain College)
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Dear Sir,

Subject: TRAI Consultation Paper on ‘Review of extant provision for sending the printed bills to consumers of landline and post-paid mobile subscribers – Our views

We are glad to introduce ourselves as Federation of Paper Traders’ Associations of India representing Paper Distributors spread throughout the country. We represent 36 Paper Trade Associations and the strength of traders are approx. 2,00,000 in number which includes from the Paper field and Stationery.

Paragraph 2.1 of the TRAI Consultation Paper on ‘Review of extant provision for sending the printed bills to consumers of landline and post-paid mobile subscribers’ states that telecom service providers and their associations have represented:

“Environmental concerns relating to cutting of trees for papers used in printing of bills and changing mobile usage scenario in the context of massive surge in data usage on smart phone were put forth to bolster their demand, as the main rationale to this demand.”

PAPER MANUFACTURING NOT AT ALL ANTI ENVIRONMENTAL AS BEING ALLEGED

The above argument does not hold ground as Paper is manufactured with the following major inputs

- Recycled waste paper
- Agricultural residue such as bagasse, rice straw.
- Paper making in India is primarily agro-based.
- From wood pulp which is made from out of the self-grown trees by Paper mills. Forests are not at all touched upon here.

Approximately 75% of the paper produced in India is from waste / recycled paper or agricultural residue as the primary raw material which contributes towards protecting the environment. If the agricultural residue and waste Paper is not utilised for making Paper, it will lead to environmental hazards for the country.

While the balance 25% is produced using pulp wood, we would like to state that unlike in some parts of the world, Paper industry in India is not a forest-based industry but an agro/ forestry-based industry engaging approximately 5 lakh farmers from whom more than 90% of the industry’s wood requirement is sourced. Farmers

grow trees on their lands as any other crop and sell their harvest to the Paper Mills. Majority of the wood is grown in backward areas and marginal land which is potentially not suitable for cultivation.

ISSUES FOR CONSULTATION

A combined reply is pieced together hereunder for all your questions with justifications around.

There is no need to change the present Default option i.e., provision of Paper bill without any charge to post-paid subscribers of mobile and wireline services, providing e-bills to consumers, the telecom operators have shifted the onus of cost of printing and paper on the consumers.

Unlike developed countries the literacy rate in India still remains low and hence many consumers will not be using electronic media – e mail to view their bills. Even though usage of Smartphone is gaining momentum of late but still many will not be knowing as to how to download bills from smartphones.

India is still not fully geared to go in for Paperless medium as most of the consumers are either not educated nor they are mentally prepared for that.

Moreover, hard copy of the bill will make it easier for consumers to make payments promptly as bills sent on electronic media are likely to get missed out leading to disconnections.

The reason for going Paperless on the misguided argument that Paper is manufactured by only cutting trees is not only incorrect but as also misleading the masses.

All consumers who require bills for audit trail and book keeping purpose take out prints at their end. Those consumers who do not require bills have already shifted from Post Paid to Pre-paid mode.

GST: There is GST on telecom services. There must be more than 20 crore people who will be claiming input credit of GST for which a hard copy of the bill is necessary. Here is where, a hard copy of the bill by Operator is needed. By contemplating to go paperless just amounts to shifting of responsibility rather than minimising of paper usage. There is possibility of errors in GST input credit as the percentage of errors will go up without a printed paper bill.

Subscribers must get hard copies of bills and not electronic bill as is at present.

Even now some telecom operators are not sending paper bills on the pretext “Save Paper” posing themselves as Messiahs of Environment-Protectors whereas the facts are poles apart. If they really meant this, they should have grown trees all over the country from the monies saved out of not sending hard copies of bills which runs into thousands of crores.

There is more to digital than meets the eye. While paper is all around us and piles up in plain sight, the energy consumed in the manufacture of digital products, energy needed to power them and the toxic e-waste associated with their end-of-life, are largely out of sight and out of mind. In order for consumers to make informed

and responsible choices it is important to be critical of claims that digital is greener than paper correspondence.

People often compare the entire footprint of paper with only the energy it takes to send or receive digital communication. However, they forget about the data centres, networks and the resources like nonrenewable metals and fossil fuels) it takes to complete the exchange.

Storing emails and attachments on a server may be convenient, but it takes an environmental toll. The longer the email is retained, the greater its impact on the climate.

As of now, only BSNL is sending bills through P&T which offers better services. Whereas, some private operators are sending bills through private couriers and we do not receive bills promptly leading to our paying late-payment fee. Therefore, TRAI must insist on all operators for sending bills only through P&T which will be a source of revenue to the ailing and feverish Postal Department.

While in other utility services such as electricity, gas, water etc., paper bills are being sent, why to discontinue in telecom sector.

The E literacy and percentage of e literate population according to the information provided by you in Chapter 3 is mere 40% in India which forces us to abandon E Bill Policy.

Senior citizen population which is more than 10 crores would continue to love to have hard copies.

If the E bill system is adopted, there will be virtual chaos.

To summarise, we feel that the entire exercise of E bills would prove futile as the grounds in favour of it are not true and fertile. The arguments in favour of e bills are lop-sided and do not represent true facts.

Therefore, the proposal of e bills may be dropped. And Paper bills be made mandatory even if a subscriber opts for e bill.

Like in case of any other trade where a purchaser is entitled to a bill/cash memo/receipt, Telecom sector is no exception. For the services rendered by the telecom company, the customer is entitled to a proper bill, under the Jaago Grahak Jaago initiatives there have been advertisement by Government asking consumers to insist for bills, why then Telecom operators are being exempted from it?

Thanking you

Yours faithfully,

For **FEDERATION OF PAPER TRADERS' ASSOCIATIONS OF INDIA**

Hiren Karia
Hon. Secretary

