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Shri Kaushal Kumar

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Sub: Comments on questions raised in the Consultation Paper on "Transparency in publishing of Tariff Offers" issued on 27th November, 2019

Ref: Your letter No.301-16/2019-FLEA (Pt) dated 5th December, 2019.

Dear Mr. Kumar,

The comments on the above cited consultation paper are enclosed. Hope this will be helpful in issuing necessary instructions to Telecom Service Providers (TSPs) in improving transparency in publishing of their tariff offers.

I would like to add that TRAI should consider involving CAGs in monitoring tariff offers of TSPs in like Appellate Committee of Service Providers.

Thanking you,

Yours sincerely,



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Comments on Consultation Paper on Transparency in Publishing of tariff Offers

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

Yes. All TSPs should adopt the format as prescribed by TRAI for publishing their tariff. It will enable all consumers to compare the tariff of different TSPs and help them to select the best tariff plan prevalent at that time. It may also help the customers to opt MNP if they want. By and large it may help the consumers and transparency in tariff can be maintained.

Q.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.

Tariff should be published in all possible mode of communication, i.e. print, digital and audio channels, including in local news papers. This practice was adopted in 2012, but later on dropped. Here we would like to share our experience that those who are having smart phone know much better about the TSP working, tariff etc., but those who, especially the rural population, still use basic mobile phones have limited access to updated information, and they have to depend mostly on Customer Care Centres and Sales outlets. Apart from this, the problem of tariff arises mostly in case of prepaid customer, therefore, it is suggested that tariff plan should be available /published in two different colours. It will helpful to prepaid customer to select the tariff easily.

Regarding essentials, we are of the view that tariff should include plan vouchers, its validity, speed, call charges, roaming, etc. and services i.e. 3G or 4G are being provided.

Q.3 Whether the extant format prescribed for publishing tariff at TSPs 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.

At present hardly 40% of the Consumers are access to website and therefore it may not be effective. Besides websites, publishing tariff rates in news papers and its display at Customer Care Centres will be more effective. The display of tariff at Sales outlets will definitely be helpful to rural population.

Q.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.

It will be better if all tariff related matters are available at one place. It may definitely be helpful to customer to select the best looking at his requirement.

Q.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.

Hardly 10% of the telecom users will be benefitted if TRAI mandate TSPs to introduce a tariff calculator. Therefore, we do not suggest for mandating such a tool.

- Q.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 incase of bundled offerings? If the answer is in negative, then please give reasons for not mandating such a disclosure**

The service providers be asked to disclose clearly the implications of discontinuation of tariff plan after expiry of protection period of six months and side by side should offer the plans to be effective after the expiry of protection period, so that customers can decide whether to switch over to the best suited plan.

- Q.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 detailed reasons for the same.**

TSPs should be required to give declaration to TRAI about tariffs etc. and displaying them in various channels. In this connection if CAGs are also involved it may be more effective, because CAGs can effectively check the tariffs and plans of TSPs at various levels and at regular interval.

- Q.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.**

The point is well taken by the TRAI and we also approve this. The updating of information of all plans in the prescribed format must be published and should be available at all Call Centers of TSPs as well as at Sales outlets. CAGs may also be allowed to publish such updated information in their website.

- Q.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.**

The service providers be required to update the information on point of sale and on their websites. The directives of TRAI dated 20.12.2018 in this connection are appreciated. Each tariff offering TSPs advertise and publish should have all details of tariffs and in such a manner that common public can understand them easily. Such

information must be available on websites / apps of service providers. It will be in the interest of service providers to display such information in their Call Centers as well as at retail outlets.

- Q.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 should prescribe format for service providers to display tariff details on their website in a simple and effective manner giving all details of tariffs with speed etc. Here we are of the opinion that such information of tariffs must be available at service providers Call Centers as well as at retail outlets so that larger population of telecom sector can take advantage of it.

- Q.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.**

It is true that providing a self certificate by Service Providers on a quarterly basis to TRAI to a great extent fulfill the requirement of monitoring. Apart from that mandating publication of tariff offers in local news papers by the service providers may be considered.

- Q.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 as robust monitoring and compliance mechanism.**

Yes. With the reduction in number of service providers and most of the service providers facing financial crises, we feel that TSPs will follow the directions of TRAI sincerely and in true spirit. However, provision for a heavy penalty for violation may be considered.

- Q.13 Any other issue relevant to the subject discussed in the consultation paper may be highlighted.**

In every state at least one CAG has been recognized by the TRAI and if they are involved in monitoring the price mechanism, tariff offers etc., it may help TRAI to a great extent.