

TRAI Consultation Paper – Tariff issues of Telecom Services

Q1. Do you foresee any requirement of regulatory intervention at this stage in tariff fixation to protect the interest of telecom service providers as well as the consumers? Please support your comments with justification.

Ans. No, there should be no regulatory intervention in tariff fixation. However, the COAI should have strict self-regulation not only on tariffs but also on the quality of service assurance given to consumers. Recently, in December 2019, when TSP's increased prices, consumers were forced to pay higher rates, as TRAI does not regulate individual tariff plans, but in that case, COAI should have intervened so that consumer rights are not affected. In grievances where consumers who opt for lifetime plans do not get any benefit when the TSP's license lapses/cancelled, COAI should play a more active role, and take appropriate action so that consumers are protected.

Q2 Do you foresee any need for change in TRAI policy of forbearance in tariffs? Please give reasons for your response.

Ans. No change is required in the TRAI policy. However, should there be fixing of floor tariff price by TRAI, then it should be strictly in adherence to the Quality of service rules stipulated by TRAI. Most of the consumer grievances received at the National Consumer Helpline is not related to tariff plans, but to the pathetic quality of service provided. Call drops and slow data speed are amongst the maximum complaints received at the National Consumer Helpline, hence it is suggested that in case a floor price is fixed, it should be separate for different data services like 2G, 3G, 4G etc. This will lead to TSP's concentrating on achieving the bench marks set, for voice and data services. In case. Also, the network provided by the TSP should be upto the mark, so that users are not inconvenienced by call drops, slow speed etc. TRAI should have a way to monitor the efficacy of the network and should impose penalties depending on the call drop data or downloading speed issues of the TSP's network.

Q7. Is there a need to fix floor price for mobile data service? If yes, can such floor price be applied uniformly to different categories of subscribers such as retail consumer, corporate, tendered or otherwise contracts, segmented and any other including one on one? If it cannot be applied uniformly, will it not result in discrimination between various categories of subscribers? Please give your answer with detailed reasons and justification.

Ans. No, there is no need for TRAI to fix the floor price for mobile data services. However, keeping in mind the expansion of "Digital India" amongst various categories of retail consumers like urban, rural and remote, there should be no discrimination in

the quality of service provided, even in the far flung areas of the country. TSP's and COAI should ensure that there is uniformity in the quality services provided primarily on the following parameters:

1. Downloading Speed
2. Maximum data usage limit
3. Validity period
4. Downtime
5. Quality of Service
6. No call drops and disturbance in voice calls.

Q12 Should there be any limit on TSPs to offer free offnet calls? Please explain your response with justification.

Ans: Off Net calls are placed from own Phone to any non-Phone subscriber. Off Net calls are offered against allotted minutes under a defined month plan. There should be no limit to offer free off net calls, for consumers

Q14. If a floor price is considered, should there be any floor price prescribed for bundled offers, including those having unlimited voice calls and data? Please give your comments with methodology and detailed justification.

Ans. No, there should be no floor price mandate. However, from grievances received at the National Consumer Helpline, consumers who have bought a "life time free offer" are under the perception that it is free if he carries on with the same TSP till such time the TSP has a valid license, the same should be made clear in bundled offers also.

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