

10 December 2018

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Advisor (F&EA-I)
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
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New Delhi – 110002

Sub: Vodafone Idea's response to TRAI's Consultation Paper on Review of extant provision for sending the printed bills to consumers of landline and Post-paid Mobile subscribers

Dear Sir,

Please find attached our comments to TRAI's Consultation Paper dated 15 November 2018 on Review of extant provision for sending the printed bills to consumers of landline and Post-paid Mobile subscribers.

We request the Authority to kindly take the above on records.

Thanking you,

Yours Sincerely,
For **Vodafone Idea Limited**



Vineet Kumar
Vice President, Regulatory & Corporate Affairs

Vodafone Idea's comments on Consultation Paper on Review of extant provision for sending the printed bills to consumers of landline and Post-paid Mobile subscribers

At the outset, we are thankful to the Authority for giving us the opportunity to provide comments to the Consultation Paper on "Review of extant provision for sending the printed bills to consumers of landline and Post-paid Mobile subscribers".

The growth in the number of wireless internet subscribers has provided considerable impetus towards digital objectives set by the nation. Various digital technologies including mobile based applications have emerged as catalysts for rapid economic growth and citizen empowerment across the globe.

In our view, e-bill should become a default option, considering factors like 90% of postpaid users are already on e-bill and various benefits of e-bill compared to paper bill to both customers and Service Providers. E-bill as default option, may be coupled with summary M-bill on SMS with a link to open complete bill, will result in adoption thereof by balance 10% also. It will be in consumer interest since they will get bills faster and make payment conveniently and/or digitally. This will also eliminate consumer complaints of non-receipt or late delivery of paper bills and late payment/ late fee etc.

As postpaid Service Provider, we are equally concerned in timely realization of payments for the services already rendered. So it will be in our own interest to make concerted campaign to educate customers about the e-bill. Once e-bill is made default option, we can make efforts for 3 months to enable customers to adopt the same, during which period such customers will continue to get paper bills too.

The Authority will also appreciate that digital is the way forward for Government departments also, like CBSE results are all online, transfer of vehicles through RTO are online, ticket bookings through IRCTC are online, so on and so forth. Besides, e-bill is a valid and acceptable document under IT Act for reimbursement like tickets printed from IRCTC are claimed for reimbursement.

Issue wise response

Q.1 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.

Ans.1. There is a need to change the extant default option. The provision of paper bill without any charge is not a preferred option by most of the post-paid customers. Approximately 90% of the post-paid subscriber base has opted for paperless option to receive the bill.

The paper bill, in present time of digital uptake, where most of the bill based transactions of varied amounts are carried out digitally, is not efficient and increases cost of services. We believe that with some handholding the balance 10% post paid subscribers will also avail the benefits of alternate processes. To ensure so, the paper bill should no more be the default option.

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

Ans.2. In our view e-bill should be the default option for customers for the following reasons:

- a) The percentage of post-paid subscribers is ~6% of the total base and most of them receive bills in form of e-bill i.e. ~10% of the post paid subscribers receive bill as paper bill and rest all receive through email. The choice regarding the type of bill intimation has so far been made by the customer. Since the digital is the established norm now in telecommunication and is well accepted by most of the customers, where lot many telecommunication transactions are already done electronically, it is important that bills by post should not be any more a default option but instead e-bill should be the default option.
- b) The e-bill has all the information and is conveniently and instantaneously delivered to the given address.
- c) Under the IT Act, the e-bill is a valid communication.
- d) In the society, where digital is increasingly becoming an adoption for all activities including e-commerce, food delivery, banking transactions, payment of fees, purchase of tickets and getting bills with access from apps and web sites, the e-bill medium is more pervasive compared to physical paper bill. Majority of credit card companies / mutual funds & banks, where everything is financial in nature, also prefer electronic transmission of statements. It should therefore be the default option.
- e) It is service providers' need that they must realize timely payments from the customers and it is not in their interest that billing issues should arise because of issues like non receipt of the bill or delay in receipt of the bill. These are best avoidable when the bills are delivered in electronic form.
- f) It is a great customer convenience where entire customer invoice is available to customers anytime anywhere i.e. on the internet / mobile phone. With increased mobility amongst working professionals, receiving physical bills through courier/post is a hassle which thereby leads to bill delivery complaints and adding efforts in re-dispatching the physical bills. This can also be eliminated by issuance of e-Bill.
- g) Default option of provision of e-bill is also required for digitalization of processes, and enhanced consumer experience.
- h) There has been a shift in consumer habits of maintaining usage bills – having a soft copy on email is considered to be a safe, effective and operates as auto reminder for on time payment. E-bill facilitates generating copies of invoice as per customers' convenience/ need and also keep track of the entire expense electronically.

For above reasons, there is a need to change to e-bill as a default option.

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.

Ans. 3. i) At present there are many post paid subscribers who are having feature phones and still have opted for e-bill option.

ii) Such subscribers who are still on existing default option of paper bill can be informed about the bill amount, period and due date of bill through SMS (i.e. M-bill). Further, such M-bill will include a hyperlink which will give information about the complete bill. At present many of the feature phones have internet capability and hence details can be easily accessed on internet.

iii) In cases where feature phone user does not have data connectivity or phone does not support data or the customer does not have e-mail, the m-bill on SMS will provide the hyperlink of detailed bill, which can be accessed through internet anywhere.

As per extant regulations, the details of local calls need not be furnished in the bill. We respectfully submit that considering the present price points, the same regulations should be extended to STD and national roaming calls. With such change m-bill will reflect all the details as in the detailed bill in cases where subscriber has neither made any international call nor availed international roaming.

iv) We respectfully submit that once e-bill is made a default option, we can run a focused programme to educate such customers over a period of 3 months during which they will get the paper bill too. Thereafter they will migrate to e-bill or to m-bill with internet link.

v) We reiterate that in case of post-paid, the bill delivery is an important obligation of service provider for it to recover the charges of the services. Thus, it is imperative on the service providers like us to thoroughly educate the customers so that neither customer is inconvenienced nor we, as service provider, face difficulty in recovering the dues. We feel that such change will greatly help in making the customer experience enriched, even for customers not having smartphones / not having emails. This cannot be achieved unless e-bill is made a default option.

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.

Ans. 4. Paper bill at present is required by a 10% base of post-paid subscribers. The per unit cost of it is increasing due to uptake of e-bill and other inflationary factors. In a scenario where e-bill is the default option, paper bill will only be an exception and its printing cost /delivery cost will be higher due to very low volumes.

We submit that e-bill is a valid document as per the law and hence there should not arise any need of physical paper bill. Some concerns like, furnishing of printed bill for re-imbusement of claims, though not valid, can also be addressed by customer providing a second e-mail ID.

Thus, we do not foresee any reason of paper bill when e-bill can be provided.

For any such exceptional case, where customer wishes to move back to paper bill and only to act as a deterrent, a nominal charge for paper bill should be prescribed.

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

Ans. 5. For such cases, the customer will have to give consent for paper bill. It should be through OTP/ similar mechanism since such bill will have nominal charge, which should be transparently communicated to customer on SMS.

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.

Ans.6. The mandated information is provided to customers for the purpose of education and increase awareness, the same information is present in e-bills already. For m-bill users, this information can be updated on our website and the link of this web URL can be sent to customers in the SMS along with Bill Summary.

As per extant regulations, the details of local calls need not be furnished in the bill. We respectfully submit that considering the present price points, the same regulations should be extended to STD and national roaming calls. With such change m-bill will reflect all the details as in the detailed bill in cases where subscriber has neither made any international call nor availed international roaming.

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

No additional issues at this stage.

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