

Subject: RE: VTL response to Draft Telecom Consumers Protection (Eighth Amendment)

Respected Sir:

This is with reference to the TRAI Press (Press Release No. 29/2015) dated 29th April, 2015 regarding Draft Telecom Consumers Protection (Eighth Amendment) Regulations, 2015. At the outset we would like to submit that Videocon Telecommunications Limited is committed to safeguard the interest of Data subscribers by providing them their usage and data tariff related information at the end of each data session, alerts about balance data left and charges applicable etc. regularly and in the best transparent manner.

In this regard, please find below comments from Videocon Telecommunications:

- i) **Information to consumers relating to usage of data:** It is proposed to mandate the service providers to provide information, through SMS or USSD, to mobile users, who have subscribed to data connection other than through data packs, about quantum of data used and the tariff thereof after every 5000 kilobytes of data usage.

Response:

- This will be a huge hindrance to the customers. Consider a customer watching Youtube or downloading/consuming some content and exceeds his 5000 Kb limit, he will receive the communication right in the middle of the session that shall become an irritant and an uncomfortable experience to the user. This will only spam the customer inbox.

- As per the TRAI Regulation on Consumer protection dated 6th January 2012 VTL is already providing the usage information

i.e. Quantum of data usage, charges deducted and the balance in the amount, after every session of the data, to all of its pre-paid subscribers. Hence, already complaint to above requirement regarding informing subscriber about data usage.

ii) It is also proposed to mandate the service providers to provide the mobile subscriber, who has taken data connection through data packs or through tariff plan with discounted tariff upto certain limit, an alert through SMS or USSD, whenever the limit of data usage reaches 50%, 90% and 100% of data limit. Also when the usage reaches 90% of the limit, information about the applicable tariff beyond the data limit shall also to be communicated.

- **Response:**

The intent of the above point is to timely intimate the customer of his near consumption of the allocated data benefits, such that he is amply aware of the base rate that may become applicable post consumption of his Data STV benefits. VTL is fully compliant on the same and provides our customer such messages on 100 MB, 50 MB and 20 MB of available benefit left on the Data Pack. Subscribers are fully satisfied and we don't receive any complaints about bill shock.

iii) **Activation or Deactivation of data services:** It is proposed that data services should be activated or deactivated only with the explicit consent of the subscriber through toll free short code 1925, following the prescribed procedures for obtaining explicit consent of the consumer and for deactivation data. Further, the customers should also

be informed through SMS at periodic interval, not exceeding six months, about the prescribed procedure for deactivation of data.

- **Response:**

- We would like to submit that even today there exists a standard mechanism wherein customers can request for deactivation & reactivation of the data services through short code of 1925. In case the customer chooses not to consume data , we are open to giving him the option to de-activate the services and also to re-activate the same as need be, by contacting customer care or through short code 1925. Mandating data activation through a short code will customer unfriendly, not be in favour of subscriber and will give unpleasant experience and unnecessary complaints about the same.

Hence, we are of the opinion that as even today, there exists a standard mechanism wherein customers can request for deactivation & reactivation of the data services through code of 1925 or calling call centre.

It is suggested that we along with Authority, initiative should be taken in creating awareness of this mechanism among customers by informing them through SMS broadcast, during workshops, information at PoS etc. about this option for easy deactivation & reactivation of data service through a toll-free short code i.e.1925. **Hence, we strongly believe this is not the right time for the Regulation.**