



VIL/LT/15-16/594
10th February, 2016

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhavan
Jawahar Lal Nehru Marg
New Delhi – 110 002

Kind Attention: Mr Arvind Kumar, Advisor (NSL)

Subject: Comments-Draft Direction on delivering Broadband Services in a transparent manner

Reference: Draft Direction issued by TRAI on 20th January 2016

Dear Sir,

This is with reference to the above captioned Draft Direction issued by TRAI on 20th January 2016.

We are pleased to submit our comments and views on the Draft Direction on delivering Broadband Services in a transparent manner.

We hope our submissions will merit your kind considerations and support.

Thanking you,

Yours Sincerely,

For **Vodafone India Limited & its Group Companies**


Sundeep Kathuria
EVP – Policy & Regulation, Regulatory Affairs

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Vodafone's Response to Draft Direction on delivering Broadband Services in a transparent manner issued by TRAI on 20th January 2016.

4.(a) (B) for Mobile broadband service:

- i. data usage limit with specified technology (3G/4G) for providing services;**
- ii. technology (3G/4G) offered for providing broadband services upto specified data usage limit; and**
- iii. technology (2G/3G/4G) offered for providing broadband services beyond data usage limit;**

Our comments:-

We are already informing the customer of the technology (2G/3G/4G) for the Data Tariff Plan/ Data Pack that the customer has subscribed. However, we wish to highlight here the fact that the customer is capable of seamlessly moving into various technologies viz. 2G/3G/4G within the same tariff plan/ data pack.

For the tariff plans having a Fair Usage Policy (FUP) limit, the speed beyond the data usage limit is not reduced by shifting the customer to a lower generation technology. We therefore recommend substituting 'speed' in place of 'technology (2G/3G/4G)' in Clause 4(a)(B)(iii).

We also respectfully submit that Clause 4(a)(B)(i) & Clause 4(a)(B)(ii) seem to be similar. Therefore, we recommend that both clauses may be combined into a single clause.

4.(b) provide information specified in para (a) above to both new and existing subscribers on their registered email address and through SMS on their mobile number registered with the service providers;

Our comments:-

We have been providing information referred in 'para (a)' to each of our mobile data subscribers via SMS alerts at the time of activation of the data tariff plans/ packs. Therefore, we recommend that re-sending this information again to the entire existing base may not be mandated.

For mobile data services, our interaction with the customer is via SMS and USSD. Therefore, we strongly recommend that sending email should not be mandated and permit the choice to the TSP to send the alert via either SMS or USSD or by email.

4.(e) send alert to the subscriber either through SMS or Unstructured Supplementary Service Data (USSD) on his mobile number, registered with the service provider or to his registered email address, each time when the data usage by the subscriber reaches eighty percent and hundred percent of the data usage limit under his plan,- and furnish compliance report by the (date).

Our comments:-

In regards to mobile data, we have been providing alerts to our subscribers related to their data usage. The Telecom Consumer Protection Regulation (8th Amendment) dated 7th Aug 2015 has further codified the entire scope of alerts for mobile data services to which we are compliant. This regulation mandates us to provide alerts at 50%, 90% and 100% of the 'data usage limit' or alternatively at 500MB/ 100MB/ 10MB of balance data quota.

Further, it may be noted that we have implemented the Telecom Consumer Protection Regulation for all our mobile data service offerings irrespective of whether the customer would has opted for a FUP plan or for standard charges (post data quota exhaustion).

We therefore recommend that the Clause 4.(e) may be deleted since a similar provision is already available and mandated under another Regulation. Alternatively, if the Authority still wishes to include this Clause in this Direction, then we recommend that the alerts be aligned to correspond with the TCP Regulation.

We will require time for the development of all the features and alerts proposed in the draft Direction. We therefore strongly recommend that a minimum time frame of three months be provided for 'from the data of issue of the Direction' for achieving compliance.