

VTL/Reg/TRAI/1601/4925
January 07, 2016

Ms. Vinod Kotwal
Advisor (F&EA),
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi — 110 002

Subject: VTL Response on Consultation Paper on “Differential Pricing for Data Services”

Ref: TRAI Consultation Paper No. 8/2015 dated 9th December, 2015

Respected Madam:

Videocon Telecommunications Limited welcomes the opportunity to give our comments to TRAI's consultation Paper on “**Differential Pricing for Data Services**” Please find attached herewith our response on the same.

This is for your information and kind consideration please.

Kind Regards



Meena Bisht
Sr. Manager
Regulatory Affairs
Mobile #: 9310225538

Encl.: as above

VTL Response to Consultation Paper
On
“Differential Pricing for Data Services”

Question 1: Should the TSPs be allowed to have differential pricing for data usage for accessing different websites, applications or platforms?

Response: Yes, the TSPs should be allowed to have differential pricing for data usage for accessing different websites, applications or platforms, as TSP makes huge investments on Spectrum, infrastructure and Sales & distribution to provide mobile and data services to the customers.

However, differential pricing schemes should not violate principles of transparency, non-discrimination, non-predatory and competitiveness.

Different types of traffic belong to different classes with different delay and error tolerance characteristics. Some services are real time, time sensitive and others can be delivered with a time gap. Some services like enterprise based, commercial services having provision of SLAs. Some services may require high degree of security and integrity. Based on these differential classes, TSPs, should have the flexibility to charge differently.

Similar principle should be applicable in case of different content providers. No content provider should be allowed to deny access to the consumers of any TSPs.

Question 2: If differential pricing for data usage is permitted, what measures should be adopted to ensure that the principles of nondiscrimination, transparency, affordable internet access, competition and market entry and innovation are addressed?

Response: TRAI may examine different data plans of the operators to determine whether a particular tariff plan conforms to the principles of nondiscrimination, transparency, affordable internet access, competition and market entry and innovation are addressed.

However, reasonable opportunity should be given to the operators to explain their tariff plans on a case by case basis.

Question 3. Are there alternative methods/technologies/business models, other than differentiated tariff plans, available to achieve the objective of providing free internet access to the consumers? If yes, please suggest/describe these methods/technologies/business models. Also, describe the potential benefits and disadvantages associated with such methods/technologies/business models?



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Response: It is a fact that differential pricing is only one of the methods to promote broadband growth. Basic factor in promoting broadband growth is the affordability. Our first objective has to be to provide access to the consumers having no access at present. It can be achieved by facilitating easy Right of way and right policy environment for operators to invest and innovate. It can be further stimulated by encouraging local content services and raising consumer awareness about broadband usage by the Government. We are of the view that, some of the services may be subsidized by the Government e.g. E-Governance, E-Medical, E-education etc.

Question-4: Is there any other issue that should be considered in the present consultation on differential pricing for data services?

Response: The objective of the Government is to bridge the digital divide and provide affordable access of internet to all the citizens. As already mentioned above, differential pricing of data services is one of the main methods to achieve this objective. To achieve this objective, Government should provide sufficient spectrum, facilitate easy RoW, uniform Tower Policy, speedy implementation of Bharat Net project.