

Following are the 10 issues as listed in the consultation paper:

Q1: In your opinion, what should be the maximum number of stages per USSD session for mobile banking service:

- (i) Five
 - (ii) **Eight**
 - (iii) Unlimited
 - (iv) Any other (please specify)
- (Please provide justification in support of your response).*

We would prefer atleast 8 stages to accommodate facilities like Fund transfer, mobile/dth recharges, etc.

Q2: Which of the following methods is appropriate for prescribing the tariff for USSD based mobile banking?

- (i) Cost-based tariff for outgoing USSD session for mobile banking; or
- (ii) Monthly (or periodic) subscription fee for the use of USSD for mobile banking services; or
- (iii) Any other method

Method 1 preferable however at a reduced charge per session. Also if possible, we propose a Toll free number be used for USSD services which would help increase the adoption. If this has any cost implications on the bank, a robust MIS should be in place to consolidate the transactions.

Q3: What methodology should be used for estimating the cost per USSD session for mobile banking service?

This Telecom companies would be in a better position to answer this. However our inputs are as below:

- 1) **We can do a Stage based charge, e.g. a transaction with 5 stages, can be charged at 5 paise per stage and thus cost comes to 25 paise for the entire transaction. This example is considering our current bulk SMS charges which is as low as 7-10 paise. Also our SMS banking cost comes to around 25-50 paise.**

Q4: If your response to the Q2 is 'Any other Method', please provide full details of the method.

Q5: Whether it would be appropriate to mandate the service providers to levy charges for USSD session for mobile banking only if the customer is able to complete his/her transaction? If yes, please describe the method to implement such an arrangement technically?

It would be better to levy charge only on successful transaction. On the technical implementation aspect, Telcos and NPCI would be better judges of the same since the messaging and responses are handled at these two ends.

Q6: Whether the present pricing model for USSD-based mobile banking in which consumers pay for the use of USSD should continue?

Same as answer to Q2

Q7: In case your response to the Q6 is in the negative, what should be alternative pricing models? Please provide justification in support of your response.

NA

Q8: Keeping in view the concerns raised by the TSPs, whether there is a need for allowing USSD push sessions when customer-initiated USSD session is dropped due to some reason so that the customer can complete his/her unfinished transaction? Please support your response with justifications.

Yes this can give a better customer experience. Also information can be pushed from the bank's side as and when required to provide information. E.g. Customer's might not remember the USSD number every time or might not remember bank IFSC, etc. This information can be sent in the form of Push.

Q9: Whether it would be appropriate to allow all variety of mobile payment services apart from the mobile banking services on the existing USSD Aggregation platform(s)? Please support your response with justification.

- 1) Mobile/DTH Recharge – Recharge is one of the most widely provided service and has been the most important service to gather the required customer base for a lot of other platforms in the market.

Q10: Is there any other relevant issue which should be considered in the present consultation on the review of regulatory framework for the use of USSD for mobile financial services?

NA

Reduction in transaction charges and introduction of new services such as merchant payment, have always been the demand from the banks and with this consultation paper, the ecosystem partners now have the opportunity to put forward their points of views. We seek your support in responding to the issues as raised by the TRAI.