

# CONSUMER SURVEY IN RESPECT OF TARIFFS OF TELE-COMMUNICATION SERVICES AND RELATED ISSUES

## Final Report



*Submitted to:*

**Telecom Regulatory Authority of India  
(TRAI)**  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg  
New Delhi - 110002

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## List of Abbreviations

**AP** - Andhra Pradesh

**ARPU** - Average Revenue Per User

**BSNL** - Bharat Sanchar Nigam Limited

**CV** - Combo Voucher

**DTH** - Direct to Home

**FUP** - Fair Usage Policy

**ISP** - Internet Service Providers

**LSA** - Licensed Service Areas

**MNP** - Mobile Number Portability

**MTNL** - Mahanagar Telephone Nigam Limited

**OTT** - Over the Top

**PV** - Plan Voucher

**SMS** - Short Messaging Service

**STV** - Special Tariff Voucher

**TTO** - Telecommunication Tariff Order

**TRAI** - Telecom Regulatory Authority of India

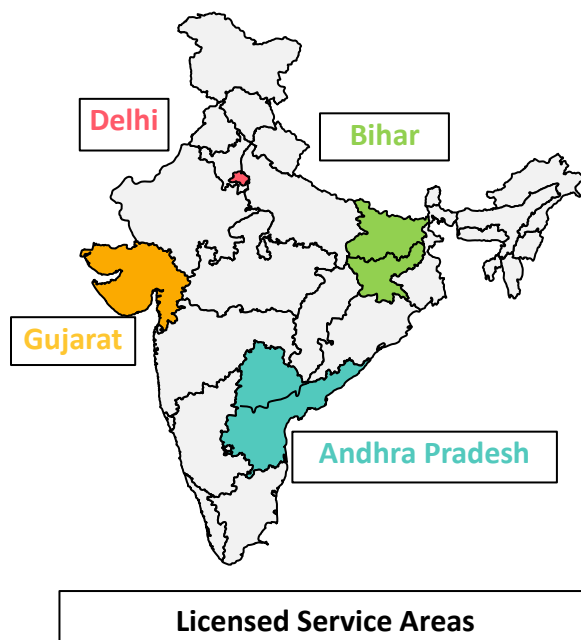
**TSP** - Telecom Service Providers

**USSD** - Unstructured Supplementary Service Data

**VAS** - Value Added Services

# EXECUTIVE SUMMARY

The telecommunications sector in India is a fast-evolving sector with constant new developments which, if unregulated, could be detrimental to the interests of consumers. The Telecommunication Regulatory Authority of India (TRAI), which regulates the telecom sector, commissioned a first-of-its-kind Consumer Survey to assess the opinions, practices and awareness of telecom consumers on key consumer protection measures. The survey was conducted by the Academy of Management Studies (AMS) between September and November 2022 and a quantitative research design was adopted for the same. The findings of the survey are intended to aid the TRAI improve the efficacy of its operations and realize its objective of protecting consumer interests and ensuring orderly growth of the telecom sector.



For the survey, 4 out of 22 Licensed Service Areas (LSAs), which represent the four zones of the country, and a metropolitan area, were chosen. These LSAs were: **Delhi (north zone and metro city)**, **Gujarat (west zone)**, **Andhra Pradesh (south zone)**, **Bihar (east zone)**. The target respondents were subscribers of wireless/mobile, wireline telephony, broadband and Internet Service Providers (ISP) subscribers of leading Telecom Service Providers (TSPs). Both online (telephonic) and offline (in-person) modes of data collection were employed, and equal representation from urban and rural areas was ensured.

The survey covered aspects such as - ease of locating tariff-related information, ease of understanding and comparing tariff-related information, suitability of tariffs to consumer needs, consumers' awareness about consumer protection measures, consumer awareness about TRAI's regulatory provisions for consumer protection and other related issues.

## I. Key Findings and Observations

The percentage of prepaid subscribers surveyed was 89% and postpaid subscribers was 11%. The wireless category had the largest proportion of prepaid subscribers at 92%, corresponding to the all-India subscription trends of 95%. Wireline telephony category had the largest share of postpaid subscribers at 90%.

A majority of wireless, ISP and broadband subscribers had begun availing the services in the last three years whereas a majority of wireline telephony subscribers were availing them since more than 15 years.

#### ❖ Ease of Locating Tariff-related Information

- **Mode of Information Access:** 59% of respondents preferred using *Third party websites/apps* to access tariff-related information. This was the most preferred mode across urban and rural areas, all LSAs and subscription categories.

*TSP retail channels* and *TSP apps* were the second and third most preferred mode, followed by *TSP customer care* and *TSP websites*. The preference for non-digital modes such as customer care and retail channels (34%) were higher in rural than in urban areas (23%).



- **User-friendliness:** An overwhelming majority, i.e., 98% of respondents found their respective modes of information access user-friendly. Increasing the visibility of packs/plans on digital platforms was the most recommended action for improving user-friendliness.
- **Ease of Physical Voucher Identification:** None of the respondents surveyed were recharging through colour-coded physical vouchers from retail stores.

#### ❖ Ease of Understanding and Comparing Tariff-related Information



- **Tariff Comparisons:** The total proportion of respondents who made some kind of tariff comparison (62%) was larger than those who did not compare at all (38%). Urban respondents tended to compare upon tariffs news of tariff change more than their rural counterparts, whereas the latter tended to make more periodic comparisons than the former. 71% of respondents in the wireline telephony category reported that they did not make any comparisons.

- **Over The Top (OTT) Services Awareness and Access:** 52% of respondents were aware of OTT services, mostly in urban areas. Delhi (69%) and Bihar (38%) showed the highest and lowest levels of awareness. 80% of respondents that were aware of OTT services knew how to access them. Knowledge of accessing OTT was highest in Gujarat (91%) and lowest in Delhi (76%). Younger respondents (aged 18-39) were more aware of OTT, and also knew how to access these services.



- **Opinions on Bundling:** 56% of respondents felt that bundling is good for consumers and 52% preferred bundled over standalone telecom offerings. In both cases, the percentages were slightly higher in rural than urban areas. Respondents in Gujarat held the most favourable opinions towards bundling whereas those in Andhra Pradesh held the least favourable opinions. 40% of respondents who preferred bundled over standalone offerings, preferred to view the price breakdown of bundled offers.



#### ❖ **Suitability of Tariffs to Consumer Needs**

- **Choice of Tariff Availability:** With regards to the choice of tariff availability, 30% of respondents were completely satisfied, 63% were partially satisfied and 7% were not satisfied at all. Urban respondents expressed higher satisfaction than rural respondents. Amongst subscription categories, broadband subscribers were most satisfied whereas wireless/mobile subscribers were least satisfied. Most respondents felt that in addition to existing tariffs, cheaper or low-cost data plans need to be made available, the validity period of plans should be extended, and the option of carrying forward unused data should be made available.
- **Mobile Tariff Affordability:** 72% of respondents felt that mobile tariffs were somewhat affordable, 19% felt that they were very affordable and 9% did not find them affordable at all. Rural respondents found tariffs unaffordable more than their urban counterparts.

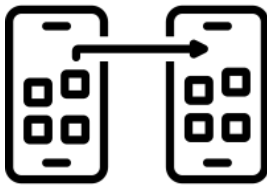
#### ❖ **Respondents' Awareness of Consumer Protection Measures**

- **Information Disclosure:** 34% of respondents were aware that TSPs are mandated to disclose all tariff-related information. 79% felt that information disclosure by TSPs was prominent. Urban respondents were slightly more aware of the mandate but a higher percentage of rural respondents felt that information disclosure is prominent. Respondents in Delhi (52%) were most aware and those in Andhra Pradesh (18%) were least aware of the mandate, but when it came to views on information disclosure, Andhra Pradesh (89%) had the highest percentage of respondents that felt that information disclosure was prominent whereas Delhi (66%) had the lowest. Many of those who felt that information disclosure was not prominent felt that the lack of information related to tariff entitlements.

- **Bill Shock:** 1% of respondents had experienced bill shock, both in urban and rural areas. Delhi and Andhra Pradesh (1.4%) and Gujarat (0.4%) had the highest and lowest percentage of respondents that had experienced bill shock. Most bill shock incidents were reported to have occurred recently, in the last three years. Instances of bill shock included deduction of top up amount without usage in case of prepaid subscriptions and plan change in case of postpaid subscriptions.



- **Mobile Number Portability (MNP):** 71% of respondents were aware of MNP whereas 20% had ported their numbers. Urban respondents were more aware, and had ported their numbers more than rural respondents. Gujarat (94%) and Bihar (42%) showed the highest and lowest levels of MNP awareness. Delhi (39%) had the highest levels of MNP utilization and Andhra Pradesh and Bihar (13%) had the lowest. Quality of service and connectivity issues was a major reason for porting.



- **Awareness of Prepaid Vouchers' Validity Mandate:** 32% of respondents were aware of TSPs' mandate to provide at least one plan, special tariff and combo voucher with a validity period of 30 days whereas 37% were aware of the mandate to provide at least one voucher which is rechargeable on the same day of every month. Urban respondents were more aware, with respondents in Delhi most aware and those in Andhra Pradesh least aware of both mandates.

#### ❖ Consumers' Views on Other Related Issues

- **Important Factors in Choosing TSP:** *Quality of Service* was the most important factor in choosing a TSP for almost half of the respondents. While *Cheaper Tariffs* was the second most important factor for urban respondents, it was *Internet Speed* for rural respondents. The trends varied across LSAs with Quality of Services remaining the most important factor in all LSAs except Gujarat where Quality of Customer Care was most important to urban respondents and Internet Speed was most important to rural respondents.



- **Tariff Change without Prior Information:** 11% of respondents, mostly rural, had experienced tariff change without prior information. Andhra Pradesh (21%) had the highest percentage of respondents that had experienced the same, whereas Bihar (4%) had the lowest.



## ❖ Respondents' Awareness of TRAI's Regulatory Provisions for Service Providers

- **Awareness of Tariff Change Mandate:** 38% of respondents were aware that a TSP cannot change tariffs within 180 days of enrolment of a subscriber. Almost half of the respondents were aware in urban areas whereas less than a quarter were aware in rural areas. There were wide disparities in awareness levels across LSAs with the highest in Delhi at 89% and the lowest in Andhra Pradesh at 11%.



- **Awareness of Tariff Discontinuance Mandate:** 29% of respondents, mostly urban, were aware that a TSP has to provide 30 days' notice before discontinuing a tariff. Delhi showed the highest level of awareness at 73% and Andhra Pradesh showed the lowest level at 10%.

- **Prepaid Voucher Awareness:** Awareness of Plan Voucher with a combined percentage of 61% of respondents that knew about the voucher and simply heard about it. This was followed closely by Top Up Voucher at 60%, Combo Voucher at 51% and Special Tariff Voucher at 47%. More than half of the rural respondents were unaware of all the vouchers. Respondents in Delhi were most aware of the vouchers whereas those in Andhra Pradesh were least aware.

- **Prepaid Consumers Receiving Regular Information:** 68% of respondents, mostly urban, were receiving regular information on service usage. Respondents in Gujarat (92%) reported receiving regular information the most whereas those in Bihar (62%) the least.

- **Value Added Services (VAS):** 58% of respondents, mostly urban, had availed VAS. Respondents in Delhi (84%) had availed them the most whereas those in Gujarat (33%) had availed them the least. Out of the respondents that had availed VAS, 83% of them said that their consent was taken before activation of VAS and 76% were aware of deactivation. Once again, this was higher in urban areas.



- **Awareness of Itemized Usage Bill:** 12% of respondents were aware of Itemized Usage Bill, with rural respondents slightly more aware than their urban counterparts. Respondents in Gujarat were most aware at 25% whereas those in Delhi were least aware at 4%.
- **Awareness of Safe Custody Scheme:** Nearly a quarter of respondents, mostly rural, were aware of the Safe Custody Scheme. 36% of respondents were aware in Andhra Pradesh whereas 11% were aware in Delhi, the highest and lowest among LSAs respectively.

- **Awareness of TRAI Directions on Tariff Publication and Advertisements:** 3% of respondents were aware of this with the highest percentage, 6% in Gujarat, and the lowest percentage, 1% in Delhi. Among those who were aware, most were aware of the direction prescribing the essentials of a transparent tariff disclosure form.



- **Discriminatory Tariff:** 9% of respondents, mostly rural, had faced discriminatory tariffs among the same class of subscribers. 16% of respondents in Gujarat and 4% in Delhi and Bihar had faced the same, the highest and lowest respectively.

## II. Recommendations

- ❖ Awareness of measures and regulatory provisions by TRAI for consumer protection can be increased which will lead to consumers taking more proactive approach in safeguarding their interests and entitlements. Third party websites including social media, and retail channels, which are the most preferred modes of information access, can be considered for increasing awareness.
- ❖ Wireless tariffs with a higher value for money, such as make-your-own-plans, the option to carry forward unused data, can be provided to address the issue of lack of affordability and inadequacy of existing tariffs, especially among rural consumers.
- ❖ Making the price breakdown of bundled offerings visible can be considered to improve transparency by providing crucial information to consumers in making more informed decisions.
- ❖ More extensive and in-depth surveys can be conducted across more LSAs to support the findings of this survey.

# 1

## Introduction and Methodology

### 1.1 Background of the Survey

The Telecom Regulatory Authority of India (TRAI) was established in 1997 as an independent body to regulate the telecommunications sector in the country which was earlier vested in the Central Government. The objective of the TRAI is to provide adequate safeguards to protect and promote consumer interests while also ensuring orderly growth of the telecom sector.

As part of its responsibility to regulate the telecom sector, the TRAI has enforced tariff regulations for the TSPs and ISPs through its Telecommunication Tariff Order (TTO) - 1999. In order to accommodate the ever-evolving telecommunications landscape, the TTO has been amended 68 times as on April 2022, reflecting the developments within the sector. For example, over the years, the TRAI has moved from 'Fixation of tariff rates' to 'forbearance with prior approval' stage to currently a 'forbearance regime with post-facto reporting obligation' with regulatory oversight.

The broad aspects of regulation covered in the TTO are:

- **Setting of Tariffs:** The TTO seeks to regulate the following three types of tariffs – (a) Tariffs specified in the TTO; (b) Tariffs subjected to tariff ceiling specified in the TTO; and (c) Tariffs under forbearance.
- **Review of Tariffs:** TRAI has the authority to review and modify tariffs for any telecom services.
- **Standard Package:** TSPs are mandated to provide standard packages to all their customers. Additionally, they may offer alternative combinations of tariff to different classes of customers in a non-discriminatory manner.
- **Limits on Tariffs:** TSPs cannot fix tariff rates under or above the tariff floor and ceiling sets by TRAI.
- **Reporting Requirement:** TSPs are required to report introduction of new tariffs and modifications to existing tariff to the TRAI.
- **Transparency and Consumer Protection:** The manner of publishing tariffs and related terms and conditions are prescribed by the TRAI. TSPs are required to follow these directions as well as not discriminate between subscribers within the same class.

Such safeguards seek to provide consumers with adequate choice, affordable tariffs and high quality of service. They also seek to ensure transparency in publishing of tariff offers by way of prohibiting misleading advertisements by the TSPs/ISPs and regulating the related aspects of migration between plans; protection of consumer from tariff changes for a minimum period of 180 days from subscription of

tariff; notice period of 30 days in the event of termination of tariff offer; requirement of explicit consent from consumer for any service that adversely impacts the payable tariff; etc.

## 1.2 Survey Rationale

Telecommunications is a fast-moving sector with constant developments, therefore needing regular interventions in the form of new regulations, tariff orders, directions and other initiatives by TRAI. The TRAI has been disseminating information to consumers through modes such as outreach programmes, media campaigns and education material in order to raise awareness regarding their rights and entitlements. Since safeguarding consumers' interests is one of the primary objectives of TRAI, it becomes necessary to assess the opinions, practices and awareness of consumers on key consumer protection measures. This would help the TRAI improve the efficacy of its operations. Therefore, a comprehensive 'Consumer Survey' with respect to tariffs of telecommunication services and related issues was undertaken in 4 of the 22 LSAs in the country.

## 1.3 Objectives of the Survey

The TRAI commissioned Academy of Management Studies (AMS) to conduct the consumer survey. The specific objectives of the survey were to:

- Understand the consumer views on evolution of tariffs per se;
- Understand the efficacy of consumer protection regulations included in the Tariff Order; and
- Understand the efficacy of transparency framework in publishing of tariff offers or in

advertisements given by the Telecom Service Providers.

## 1.4 Survey Methodology

The consumer survey adopted a quantitative research design involving online (telephonic) and offline (in-person) modes of data collection from a sample across four randomly-selected LSAs from each of the four zones of the country. The LSAs chosen for the survey were **Delhi** (north zone and metro city), **Gujarat** (west zone), **Andhra Pradesh** (south zone), and **Bihar** (east zone).

### 1.4.A Sampling Methodology

As the Consumer Survey was the first-of-its-kind to assess consumers' opinions, practices and awareness of key aspects of consumer protection measures, it was important to ensure that the sample was a representation of the consumer base of the telecommunication sector. The respondents sampled were subscribers of the following types of services provided by the TSPs and ISPs as depicted in Table 1.1.

**Table 1.1: Types of Services Surveyed**

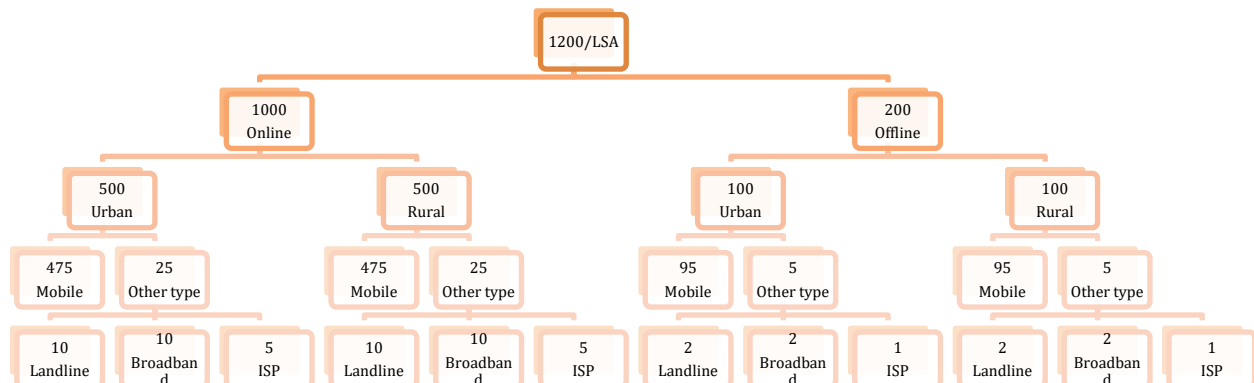
Type of Service Providers	Telephony		Broadband	
	Wireless	Wireline	Wireless	Wireline
Telecom Service Providers (TSPs)	✓	✓		✓
Standalone Internet Service Providers (ISPs)			✓	

Within each selected LSA, a minimum sample of **1,200 subscribers** of the aforementioned four types of services was selected for the survey. This sample size ensured generation of reliable and statistically valid estimations. This sample underwent further stratifications as detailed below:

**a) Stratification across Types of Services**

For selecting the said sample, due representation was given to each of three types of subscribers (all except wireless/mobile). Due care was taken to ensure that the **total number of respondents from each of the three types was at least 20**. In the wireless/mobile category a minimum of 475 respondents were selected since this category has the largest proportion of subscriber base. Further, care was also taken to ensure that the **proportion of offline respondents was at least one-fifth of the online respondents**. In this way, a total of **4,800 subscribers** was selected as the minimum survey sample from across the four LSAs in the country as depicted in Figure 1.1.

**Figure 1.1: Sampling Stratification Across Types of Services**



## b) Stratification across Urban/Rural areas

For selecting the required number of sample respondents from each LSA, care was taken to ensure that it was representative of both rural and urban subscribers. Therefore, the required sample of subscribers was selected **in equal proportion from across both rural and urban areas**, except in the case of the metropolitan city of Delhi which has only the urban population within its entire geographical expanse. The required total of 1200 respondents were divided into 600 from urban and 600 from rural areas in the three LSAs except Delhi. However, during the survey, the actual number of respondents covered exceed this number as shown in Table 1.2. A total of 5176 respondents were interviewed as against a target of 4800.

**Table 1.2: Sample Coverage**

Modes of Data Collection	Collection Area Types	No. of Respondents Surveyed									
		Delhi		Bihar		Andhra Pradesh		Gujarat		Across All 4 Regions	
		Target	Actual Coverage	Target	Actual Coverage	Target	Actual Coverage	Target	Actual Coverage	Target	Actual Coverage
Online	N/A	1000	1033	-	-	-	-	-	-	1000	1033
	Urban	-	-	500	542	500	513	500	584	1,500	1639
	Rural	-	-	500	523	500	506	500	552	1,500	1581
Offline	N/A	200	217	-	-	-	-	-	-	200	217
	Urban	-	-	100	113	100	159	100	101	300	373
	Rural	-	-	100	116	100	114	100	103	300	333
<b>Total</b>		<b>1200</b>	<b>1250</b>	<b>1200</b>	<b>1294</b>	<b>1200</b>	<b>1292</b>	<b>1200</b>	<b>1340</b>	<b>4800</b>	<b>5176</b>

## a) Stratification across Market Share of TSPs

For selecting the required number (1,200) of sample respondents from each LSA, care was taken to ensure that it was representative of the market share of the TSPs in the said LSA. As per the data curated from the Telecom Subscription Data as on 30th November, 2021<sup>1</sup>, the market share of various TSPs and the actual sample coverage of the survey is depicted in Table 1.3. The sample for ISPs was not drawn according to market share since the required sample size was not large enough for it to be representative of the ISPs' market shares.

**Table 1.3: Sample Coverage According to Market Share of TSPs**

LSA	Proportion of Respondents Subscribed to Different TSPs									
	Reliance Jio		Bharati Airtel		Vodafone Idea		BSNL		MTNL	
	Market Share	Actual Coverage	Market Share	Actual Coverage	Market Share	Actual Coverage	Market Share	Actual Coverage	Market Share	Actual Coverage
Delhi	34%	33%	31%	30%	31%	30%	-	-	5%	6%
Gujarat	39%	37%	18%	17%	35%	34%	8%	11%	-	-
AP-Telangana	36%	35%	38%	35%	16%	15%	11%	14%	-	-
Bihar	39%	38%	43%	39%	12%	12%	6%	10%	-	-

Excitel Broadband	Indianet	GTPL Broadband	Hathway	DEN Broadband	Fusionet Web Services	Atria Convergence
36%	22%	22%	8%	6%	4%	2%

#### 1.4.B: Sampling Approach

A **Stratified random sampling** method was used to sample the desired number of respondents. The method of selection adopted for each stage is described ahead:

A complete list of subscribers with the following information was requested from each TSP as provided in Table 1.4.

**Table 1.4: Format for Data Sharing by the TSPs for the Purpose of Sampling (Stage 1)**

S.No.	LSA (Delhi/ Bihar/ Gujarat/ Andhra Pradesh)	State	Area (Urban/Rural)	Type of Service (Wire line telephony/ Wire line Broadband/ Wire line/Wireless Broadband of stand- alone ISPs/ Wireless telephony)	District	Block	Unique Identifier/ Contact Number
1							
2							
3							

From these lists, the selected number of sample (plus a buffer) was randomly selected using the **systematic random sampling approach**. The sampling interval was decided by dividing the total number of subscribers in each list by the required number of respondents. A random number between 1 and the sampling interval calculated was generated. This random number served as the starting point and the first unit to be sampled. The sampling interval was added to this number and the subsequent units were selected until the desired number was reached.

A higher sample than the required number was drawn to act as a buffer since a lower response rate was expected in the online telephonic survey and in cases of change of residence. Once the respondents were sampled, the TSPs were requested to provide the following details as provided in Table 1.5. for the selected sample, which aided us in contacting them for data collection. The TSPs were required to share the complete address for the sampled offline respondents alone.

**Table 1.5: Format for Data Sharing by the TSPs for the Selected Sample (Stage II)**

S.No.	LSA (Delhi/ Bihar/ Gujarat/ Andhra Pradesh)	State	Area (Urban/ Rural)	Type of Service (Wire line telephony/ Wire line Broadband/ Wire line/Wireless Broadband of stand- alone ISPs/ Wireless telephony)	Name	Contact Details (Phone number)	District	Block	Address (Applicable to offline respondents alone)
1									
2									
3									

### 1.4.C Data Capture Mechanisms

The primary data collection under the assignment was carried out by using a soft version of the questionnaire in **computer-assisted personal interviewing (CAPI)** mode. For the same, android tablets loaded with ODK App that supports both 'offline' and 'online' modes of data collection were utilized. These tablets were provided to all our field staff from our own pool that we maintain on an ongoing basis for undertaking similar field-based data collection exercise.

### 1.4.D Data Quality Assurance Mechanisms

Strict measures to assure the quality of data were undertaken before, during and after the survey as detailed below:



- a) **Before Survey:** After developing the tools, they were pilot-tested to ensure that the data captured would be of good quality. Extra attention was paid to the pilot-testing of translated tools. Following this, the tools underwent rigorous trial runs on CAPI software to identify and eliminate errors. Suitably skilled field-staff were identified for the data collection process. Intensive, multiple rounds of training were conducted including orientation of state level coordinators, training of trainers with TRAI, state-level trainings and mock interviews.
- b) **During Survey:** Data collection process was closely monitored. Spot checks of data were conducted on the field. The recorded data was further scrutinized through customized field-check tables on a daily basis. The field unit was given regular feedback based on data scrutiny, and action was taken against those who erred on a regular basis.
- c) **After Survey:** Telephonic verifications of respondents were conducted on a random basis to confirm proper administration of survey. Collected data underwent back checks and data validation through syntax-based error detection. Erroneous data was cleaned and, in some cases, rejected.

#### 1.4.E Challenges

A major limitation faced in the consumer survey was that of low response rate from respondents. This was on account of multiple reasons such as inactive phone numbers, unavailability of respondents, change of address, and apprehensions of respondents to reveal information relating to telecom services usage particularly in the online mode of data collection. Despite having a large buffer sample, additional sample was collected from TSPs for certain categories.

## 2

## Socio-Demographic Profiles of Respondents

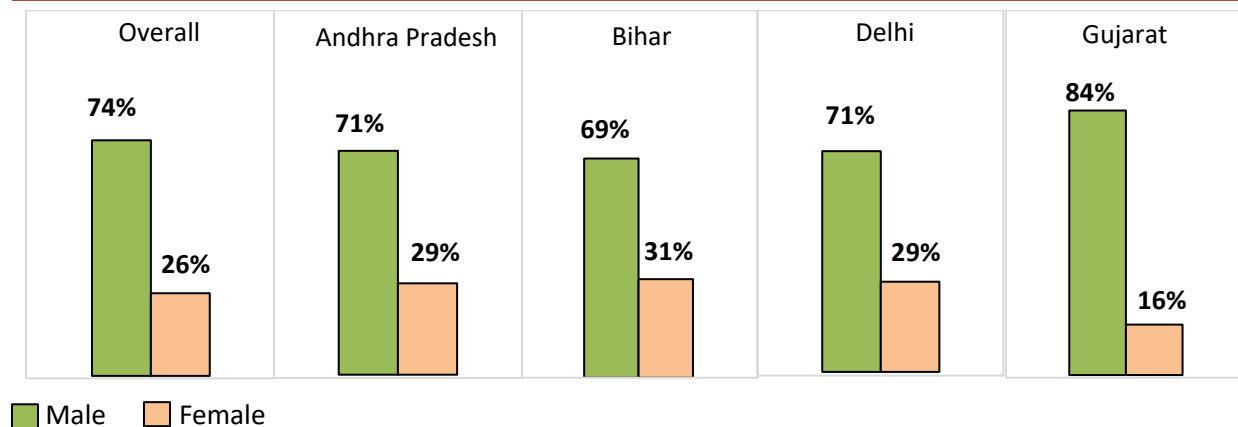
Socio-demographic profiles capture details of gender, age, education and primary occupation of the respondents and give us a sense of who the respondents are. While studying the key findings of the survey, awareness of the socio-demographic profiles provides insights into the possible reasons for the given responses.

### 2.1 Distribution of Respondents by Gender

Nearly three-fourths (74%) of the respondents of the survey were male and a quarter (26%) of them were female. This differed greatly from the gender distribution seen in India wherein 52% are male and 48% are female (UN, 2022). This suggests that a lower percentage of women are telecommunication subscribers and highlights the need for further progress in the digital inclusion of women.

Gujarat had the highest percentage of male respondents (84%) and Bihar had the lowest percentage of male respondents (69%). In both Delhi and Andhra Pradesh, the percentage of male and female respondents was 71% and 29% respectively. This is represented in Figure 2.1.

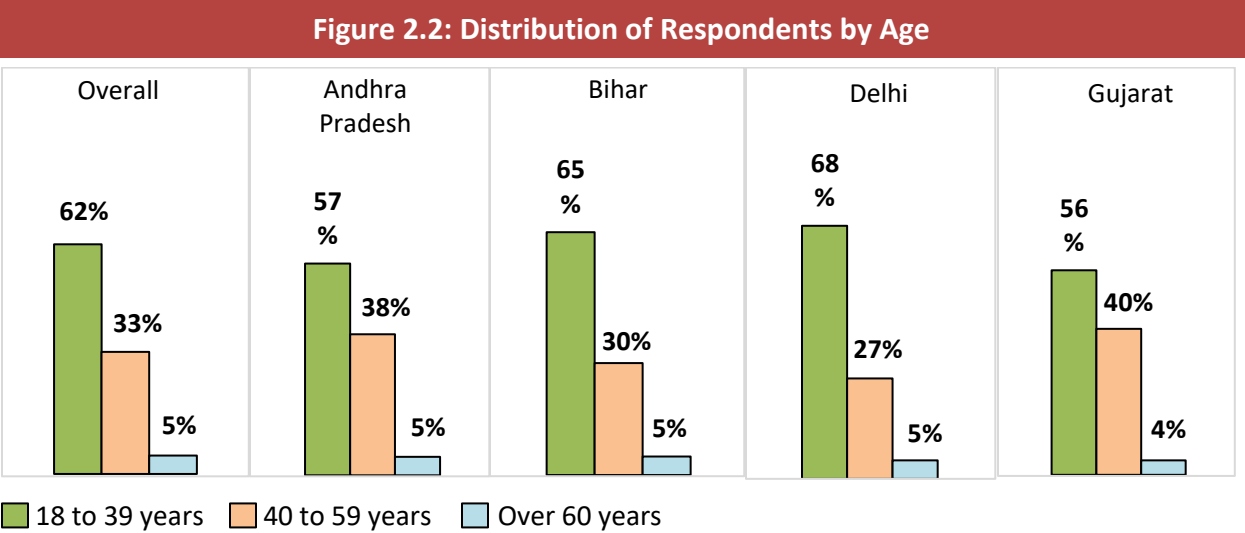
Figure 2.1: Distribution of Respondents by Gender



### 2.2 Distribution of Respondents by Age

A majority of respondents, 62% of them, fell in the younger age group of 18 to 39 years. 33% of respondents were in the 40 to 59 years age group whereas 5% of them were over 60 years of age. This was somewhat comparable to the all-India trends of distribution of these particular age groups, 54% belonged to the 20-39 years age group, 32% belonged to 40 to 59 years age group, and 14% were over 60 years old (Census 2011).

The trends were similar across LSAs, varying slightly in proportions. Delhi had the largest proportion of young respondents, 68% of them who were in the age group of 18 to 39 years whereas Gujarat had the smallest proportion, 56% of respondents in this age group. None of the LSAs had more than 5% of respondents in the 60 years and over age group. This is depicted in Figure 2.2.



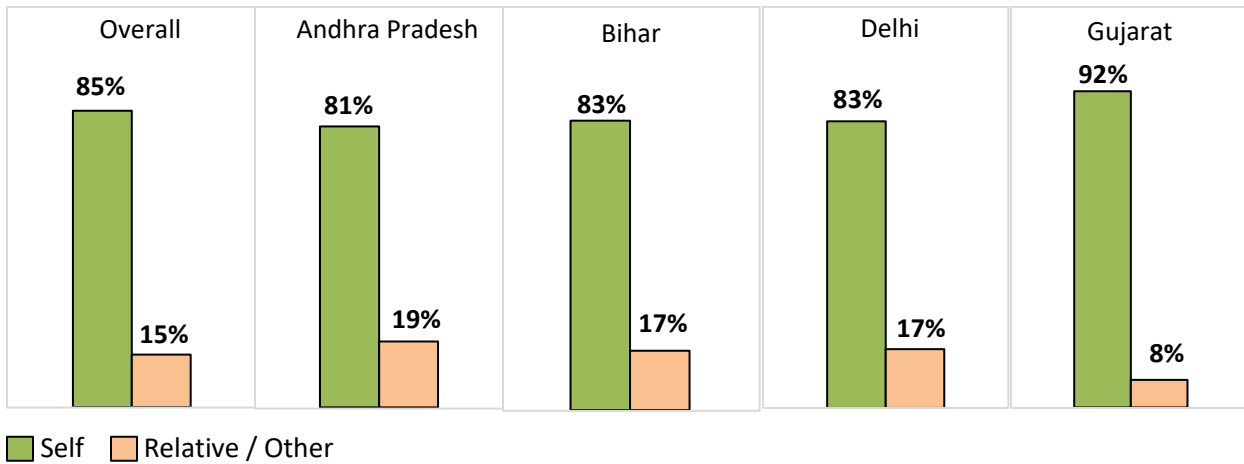
### 2.3 Distribution of Respondents by Relationship to Subscriber

A majority of respondents surveyed were themselves subscribers of the TSPs. In some cases, the respondents surveyed were not the subscribers and were using telecom services subscribed to by their relatives or employers. Overall, 85% of respondents surveyed were subscribers of TSPs themselves whereas 15% of respondents were related to the subscriber.

Most of these relatives (32%) were spouses of the subscriber, followed by children (26%) and siblings (13%). A majority of respondents who were spouses of the subscribers were female (79%) and the rest were male (21%), indicating that there are even fewer female subscribers of telecom services than suggested by the gender distribution of the respondent base. Coming to the children of subscribers, a majority were male (71%) and the rest were female (29%).

Gujarat had the highest percentage of respondents surveyed who were subscribers whereas Andhra Pradesh had the lowest. The same is depicted in Figure 2.3.

**Figure 2.3: Distribution of Respondents by Relationship to Subscriber**

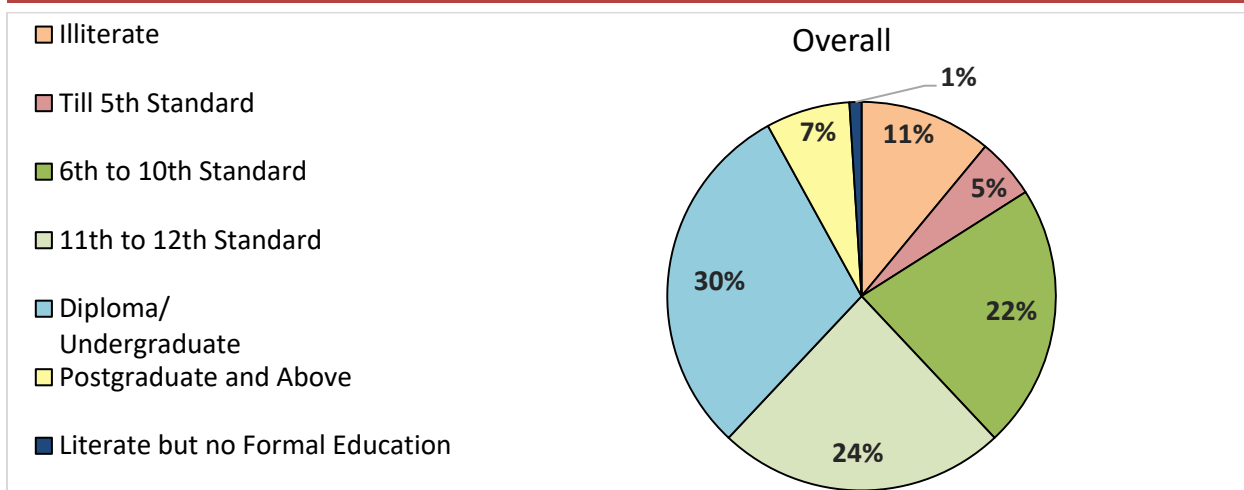


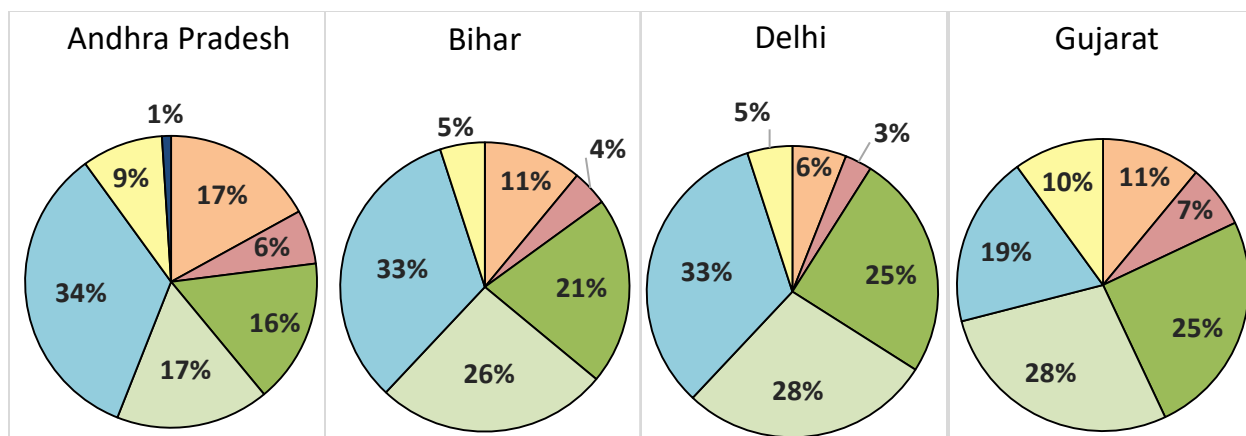
## 2.4 Distribution of Respondents by Education Levels

30% of the respondents were graduates/diploma holders, making it the largest category. 7% of respondents were postgraduates. However, the total proportion of respondents that had finished some level of schooling were the majority. 11% of respondents were illiterate.

Andhra Pradesh had the highest proportion of illiterate respondents. Delhi had the lowest proportion of illiterate respondents while Gujarat and Bihar matched the overall trends in this category. Andhra Pradesh also had the largest proportion of undergrad and postgrad degree holders, followed by Delhi, Bihar and Gujarat. This is depicted by Figure 2.4.

**Figure 2.4: Distribution of Respondents by Education**





## 2.5 Distribution of Respondents by Occupation

Salaried persons in private sector formed the largest category with almost one-third of respondents, followed by homemakers and self-employed persons. Pensioners, those who were elderly but not pensioners, and artisans formed the smallest categories of respondents.

In Delhi, the proportion of salaried persons in private sector was considerably higher than other LSAs at 44%. The proportion of homemakers was also higher in Delhi compared to other LSAs. In Gujarat, self-employed and skilled labourers formed the second and third largest category whereas those engaged in agriculture and other allied activities formed the second largest category in Andhra Pradesh. Table 2.1 represents the distribution of respondents by primary occupation.

	Overall (N=5176)	Andhra Pradesh (N=1287)	Bihar (N=1292)	Delhi (N=1250)	Gujarat (N=1340)
<b>Agriculture</b>	9%	16%	7%	1%	11%
<b>Artisans</b>	0	0	0	0	1%
<b>Skilled Labourer</b>	6%	6%	3%	1%	14%
<b>Unskilled Labourer</b>	2%	3%	1%	3%	1%
<b>Salaried-Government</b>	4%	3%	9%	1%	3%
<b>Salaried-Private</b>	28%	25%	21%	44%	22%
<b>Self-Employed</b>	14%	8%	15%	16%	17%
<b>Small Enterprise/Business</b>	5%	6%	3%	1%	9%
<b>Pension</b>	1%	3%	1%	2%	0

**Table 2.1: Distribution of Respondents by Primary Occupation**

<b>Homemaker</b>	17%	17%	21%	22%	11%
<b>Student</b>	10%	9%	15%	7%	7%
<b>Unemployed/Looking for Employment</b>	3%	3%	3%	1%	3%
<b>Retired</b>	1%	1%	1%	1%	1%

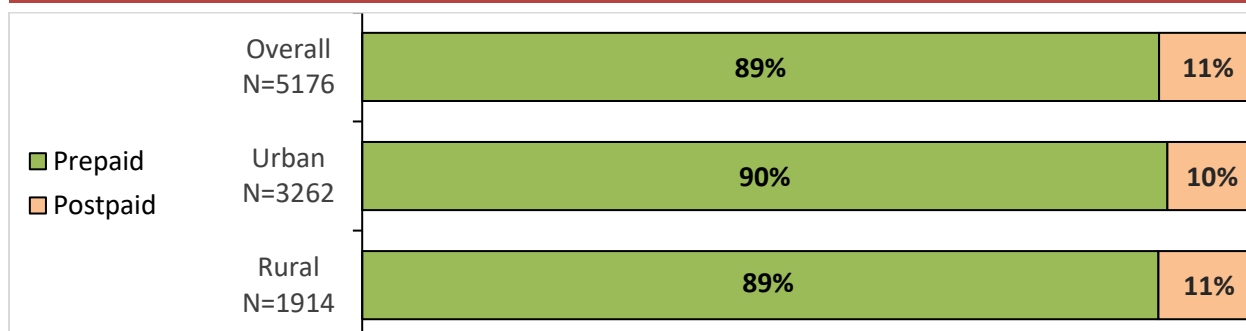
## 2.6 Distribution of Respondents by Nature of Subscription

Telecom consumers have the option of choosing one of two billing options: prepaid and postpaid. Prepaid subscriptions involve making payment in advance to the TSPs for services that will be consumed. Postpaid subscriptions involve payments made at the end of the billing cycle.

### Overall, Residential Area and LSA:

While looking at the overall aggregates, the total proportion of prepaid subscribers surveyed was 89%, and the proportion of postpaid subscribers was 11%. The trends between urban and rural areas were almost similar, with rural areas having a slightly higher proportion of postpaid subscribers than urban areas, i.e., 11% and 10% respectively. The same is represented in Figure 2.5.

**Figure 2.5: Percentage of Prepaid and Postpaid Subscribers Surveyed (Overall)**

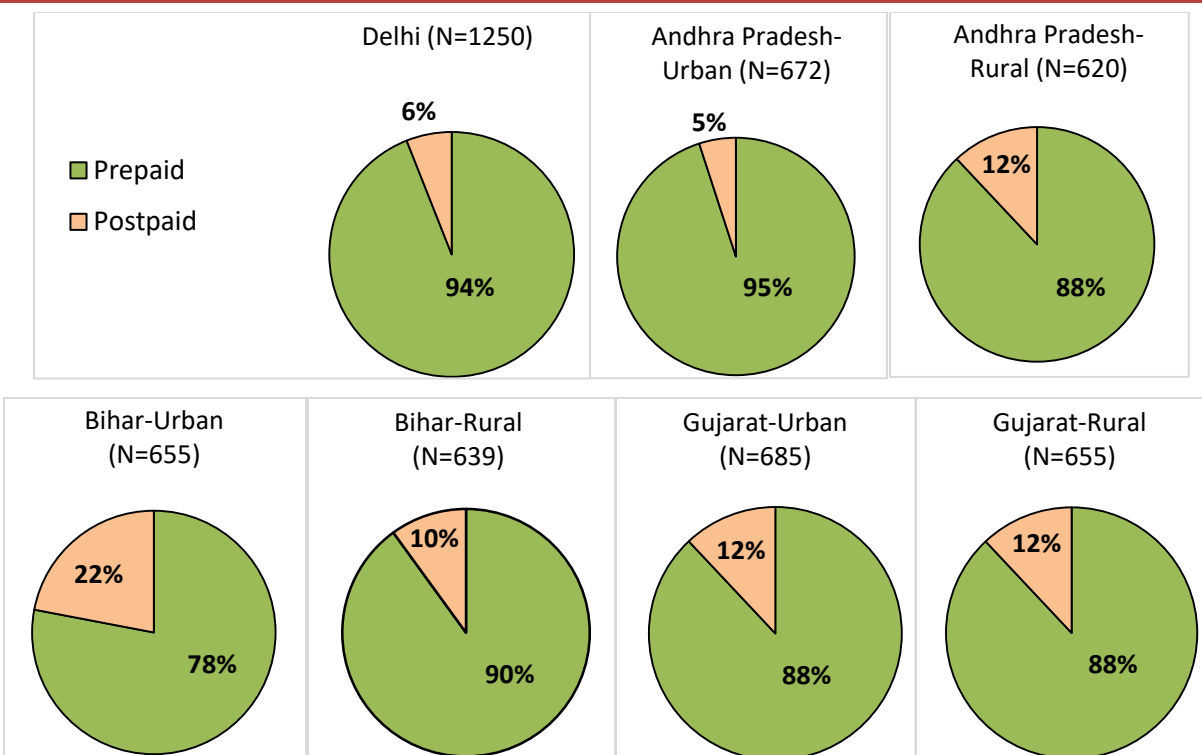


Prepaid subscriptions are considered to be cost-effective and can be tailored to suit budget and usage requirements whereas postpaid subscriptions are relatively more expensive but offer a hassle-free experience. It can be expected that urban consumers would opt for postpaid subscription more than their rural counterparts as the former are more likely to have a fixed income than the latter.

In light of this, the results of the survey may seem counterintuitive. However, a closer look at the trends across LSAs shows that urban consumers in Gujarat and Bihar did prefer postpaid subscriptions more than rural consumers. The overall averages for urban and rural areas were a result of consumers in Delhi and

urban consumers in Andhra Pradesh having more prepaid subscriptions. Figure 2.6 depicts the proportion of prepaid and postpaid subscribers across LSAs.

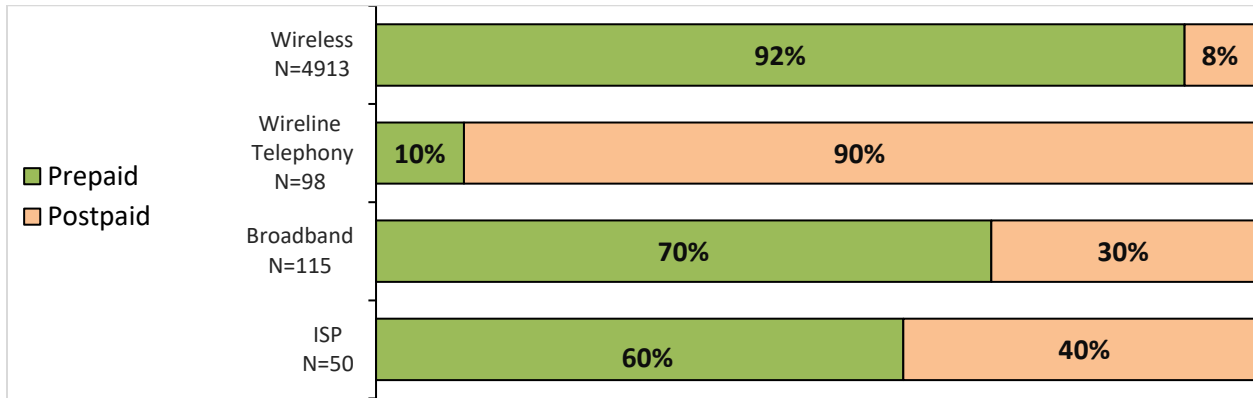
**Figure 2.6: Percentage of Prepaid and Postpaid Subscribers Surveyed (LSA)**



**Type of Subscription:**

The largest proportion of prepaid subscribers was in the wireless category with 92%. This roughly corresponds to the all-India subscription trends for wireless services wherein the share of prepaid subscribers is 95% (TRAI, 2022). Wireline telephony category had the largest share of postpaid subscribers at 90%. This is because the offering of prepaid wireline telephony connections is relatively new having been introduced by BSNL in 2018. Figure 2.7 depicts the proportion of prepaid and postpaid subscribers across subscription categories.

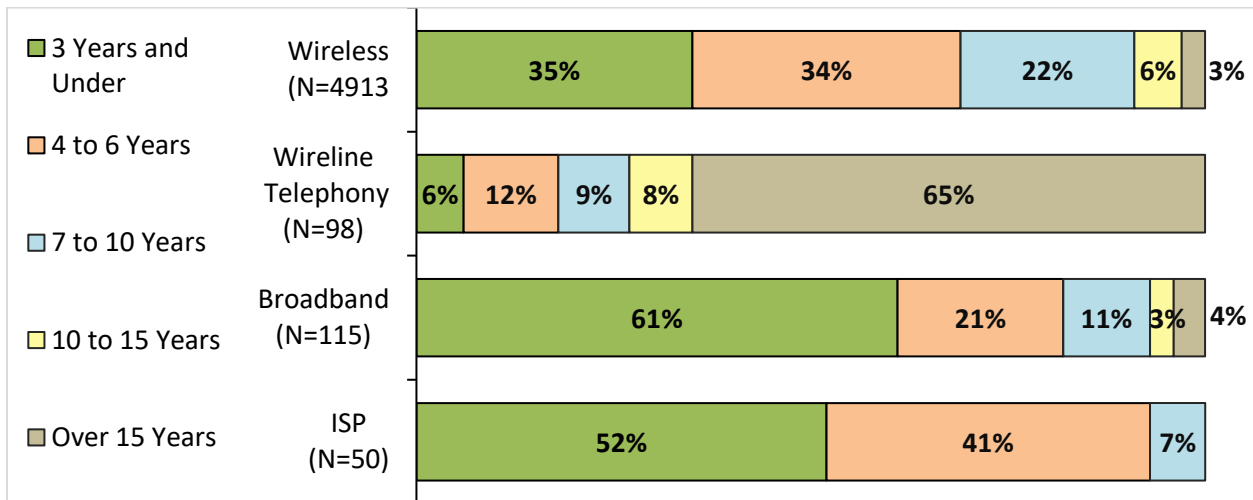
**Figure 2.7: Percentage of Prepaid and Postpaid Subscribers Surveyed (Subscription Category)**



### 2.7 Distribution of Respondents by Duration of Service Usage

A large percentage of wireless, broadband and ISP subscribers had subscribed to the services that they were interviewed about, since the last few years. While one-third of wireless subscribers were availing services from the last 3 years or under, nearly two-thirds of broadband and half of ISP subscribers were doing so. Contrastingly, 65% of wireline telephony subscribers were availing services from over 15 years. This is represented in Figure 2.8.

**Figure 2.8: Proportion of Respondents Using Services from Different Durations**

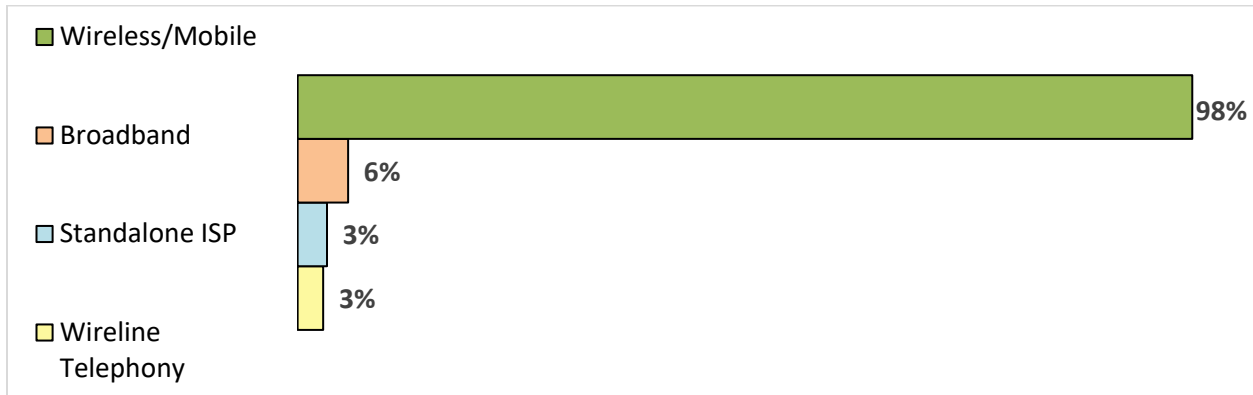




## 2.8 Types of Services Subscribed to by Respondents

Apart from the subscription category that they were interviewed under, respondents were asked which other services that they were subscribing to. As seen in Figure 2.9, 98% of all respondents were using wireless services. 6% were using broadband, 3% were using ISP and wireline telephony services.

Figure 2.9: Types of Services Subscribed to by Respondents



# 3

## Consumers' Perspectives on Tariffs

### A. Easy to Locate

#### 3.1 Accessibility of Tariff-related Information

Telecom consumers often have little information, poor quality information or mis-information which hampers their ability to make informed decisions. Ease of locating and accessing information related to tariffs is therefore of prime importance in ensuring consumer welfare.

##### 3.1.A Consumers' Preferred Modes of Information Access

###### **Overall, Prepaid-Postpaid, Residential Area and LSA:**

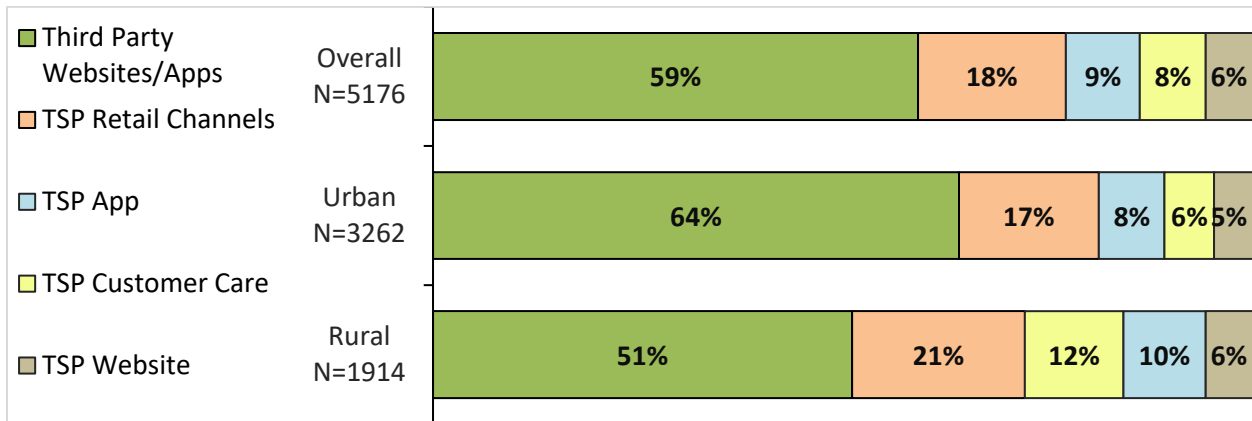
There are multiple modes of accessing tariff-related information available to consumers. To understand which modes are most preferred by consumers, respondents were asked, '**How do you generally access information relating to tariff offers?**' This question was asked to all the respondents.

As represented in Figure 3.1, **59% of respondents preferred accessing information through *Third Party Websites/Apps***. 9% of respondents preferred accessing information through *TSP Apps* and 6% preferred *TSP Websites*. The emergence of UPI apps and digital wallets like PhonePe and Amazon Pay, which have many benefits for bill payments made through them, could be a reason for *Third Party Websites/Apps* overtaking TSP digital platforms as the most preferred mode.

***TSP Retail Channels* were the second most preferred mode, preferred by 18% of respondents.** The use of digital modes was prominent even in retail channels as the store employees relied on digital modes to convey tariff related information to consumers. This suggests that while the use of digital modes has increased, many consumers continue to require assistance to navigate through the telecom landscape.

8% of respondents preferred *TSP Customer Care*. In some cases where subscribers were using the telecom connections for work, their employers were selecting tariff plans on their behalf, whereas in a few other cases the subscriber's relatives were accessing information on their behalf.

**Figure 3.1: Modes of Information Access (Overall)**



**The trends were similar among both prepaid and postpaid subscribers. Third Party Websites/Apps were the most preferred in both urban and rural areas.** Respondents in urban areas showed a higher preference for digital modes with an aggregate of 77%. Respondents in rural areas also showed a high preference for digital modes although less than their urban counterparts, with an aggregate of 67%. Their preference for *TSP Retail Channels* and *TSP Customer Care* was 34%, higher than urban respondents.

These trends indicate that although digital modes of accessing tariff related information have overtaken physical retail stores and customer care in prominence, the latter continues to be indispensable to a substantial portion of consumers, especially in rural areas.

Furthermore, the data captured represents primary modes of information access and not alternate modes which consumers may sometimes turn to in case of failure of primary mode. In these instances, the role of modes which were not named as the most preferred becomes significant to the ease of locating and accessing tariff related information.

Table 3.1 depicts the most preferred modes across LSAs. While Delhi and Gujarat matched the overall trends, the trends varied in Andhra Pradesh and Bihar. *Third party websites/apps* were the most preferred across all LSAs. Respondents in Gujarat showed a higher preference for *TSP Retail Channels* than other LSAs. Rural respondents in Bihar showed higher preference for *TSP Customer Care* and urban respondents showed higher preference for *TSP Websites* than other LSAs.

**Table 3.1: Modes of Information Access (LSA)**

		TSP Website	TSP App	Third Party Website/App	TSP Customer Care	TSP Retail Channels
Delhi (N=1250)		0.2%	2%	83%	3%	12%
Gujarat (N=1340)	Urban	2%	15%	38%	15%	30%
	Rural	4%	9%	41%	16%	30%
Andhra Pradesh (N=1287)	Urban	3%	9%	65%	3%	20%
	Rural	2%	12%	66%	3%	17%
Bihar (N=1292)	Urban	12%	6%	51%	18%	13%
	Rural	21%	14%	51%	4%	10%

**Type of Subscription:**

*Third Party Websites/App* led as a preferred mode across all subscription categories as well. 94% of broadband and ISP subscribers relied on digital modes. While wireline telephony and Wireless subscribers also relied on digital modes the most, a significant proportion of these subscribers, 36% and 27% respectively, relied on non-digital modes. This is depicted in Table 3.2.

**Table 3.2: Modes of Information Access (Subscription Category)**

	TSP Website	TSP App	Third Party Website/App	TSP Customer Care	TSP Retail Channels	Others
Wireless/Mobile	5%	9%	59%	8%	19%	
Wireline Telephony	4%	1%	59%	27%	6%	3%

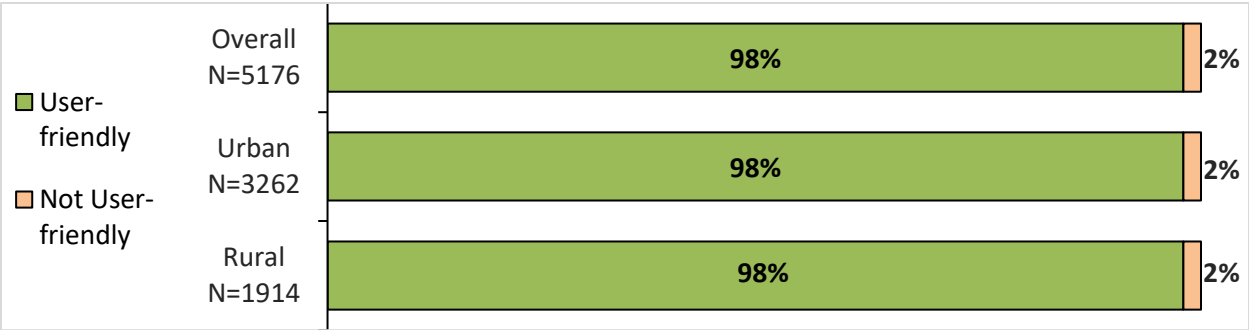
	TSP Website	TSP App	Third Party Website/App	TSP Customer Care	TSP Retail Channels	Others
Broadband	4%	7%	83%	5%	1%	
Standalone ISP	12%	12%	70%	6%		

### 3.1.B User-friendliness of Modes of Information Access

**Overall, Prepaid-Postpaid, Residential Area and LSA:**

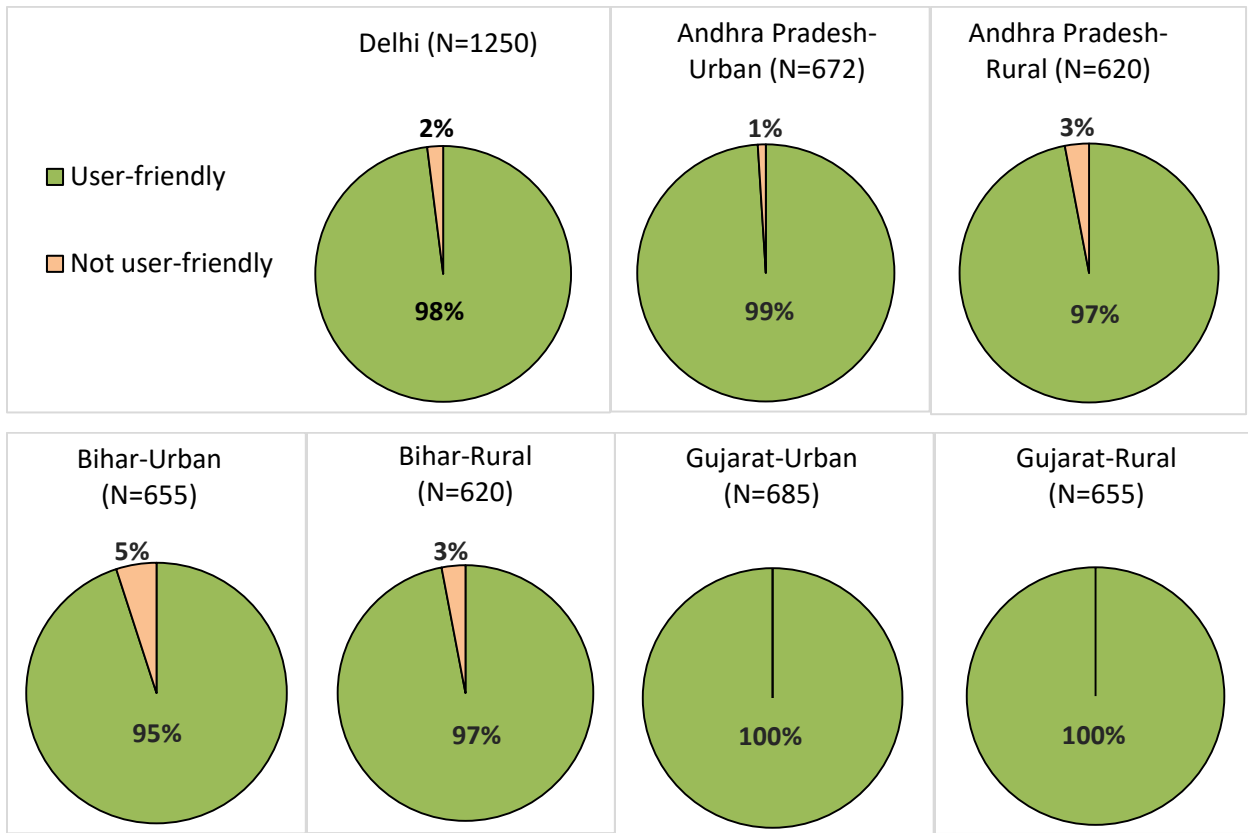
In order to assess the user-friendliness of their respective modes of information access, respondents were asked, *'Do you find 'the mode' user-friendly?'* This question was asked to all the respondents. A very large proportion of respondents, i.e., **98% of them found their respective modes of accessing tariff-related information user-friendly.** 98% of prepaid subscribers and 95% of postpaid subscribers found the modes user-friendly. The trends were the same between urban and rural areas as represented in Figure 3.2. Respondents reported *Third Party Websites/Apps* as the most user-friendly and *TSP Websites* as the least user-friendly.

**Figure 3.2: Percentage of Respondents that Found Information Source User-friendly (Overall)**



When it came to LSAs, 100% of respondents in Gujarat found their modes of information access user-friendly. Delhi and Andhra Pradesh matched the overall trends whereas 96% of consumers in Bihar found them user-friendly. The trends of LSAs are depicted in Figure 3.3.

**Figure 3.3: Percentage of Respondents that Found Information Source User-friendly (LSA)**



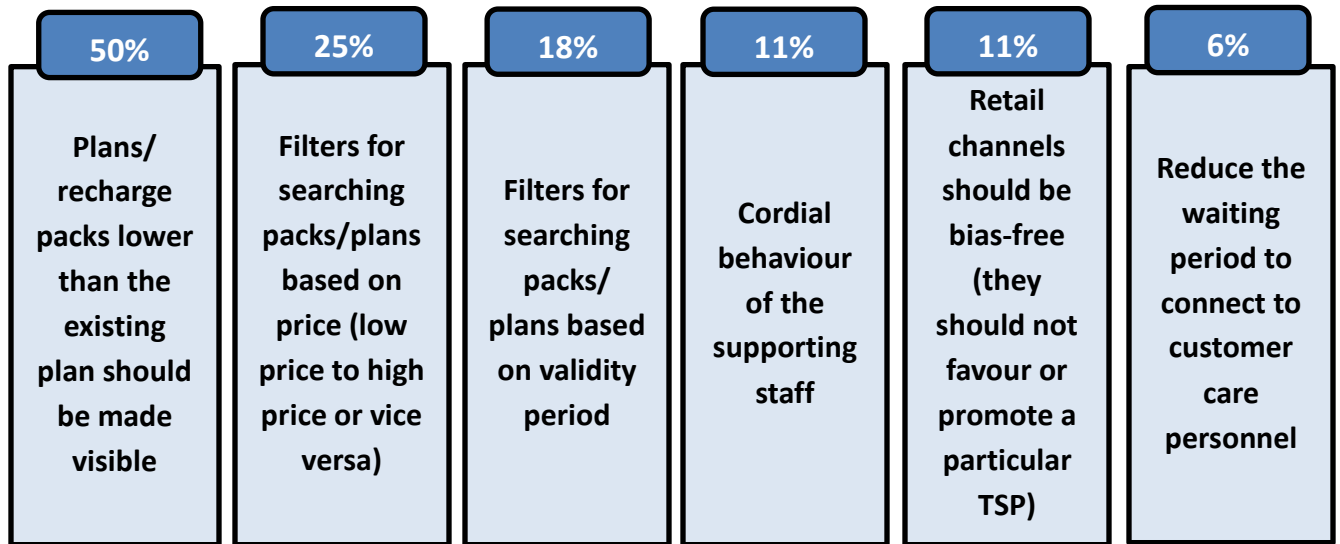
### 3.1.C Recommended Ways of Improving Information Access

#### Overall:

Respondents that did not find their preferred modes user-friendly were further asked, ***'If No, what changes would you suggest?'*** Most respondents suggested that the ***visibility of plans/recharge packs lower than existing packs should be increased***, and that ***filters for searching packs and plans based on price and validity should be made available***. In cases where respondents accessed information through TSP Retail Channels and Customer Care, they suggested ***more cordial behaviour from supporting staff***, followed by ***bias-free presenting of tariff offers by various TSPs in retail channels***, and a ***reduction in the waiting period to connect to customer care personnel*** as ways of improving information access. The same is depicted in Figure 3.4.

The prominence and use of digital modes was observed even in retail channels as the staff relied on them to convey information requested by consumers. Therefore, some respondents who accessed information through retail channels also recommended increasing visibility of packs/plans.

Figure 3.4: Recommended Ways of Improving Information Access



### 3.2 Ease of Identifying Physical Vouchers

Non-transparency of tariff-information provided by service providers had, in many instances, resulted in unintended activation of certain packs. To enable consumers to easily identify and distinguish the different types of vouchers by consumers, TRAI had specified a colour-band that should be printed on the back of the vouchers: Red for Plan Vouchers, Green for Top Up Vouchers, Yellow for Special Tariff Vouchers and Blue for Combo Vouchers.

#### 3.2.A Usage of Colour-coded Physical Vouchers by Consumers

Respondents who were prepaid wireless consumers and were accessing information through retail channels were asked, *'Do you receive colour coded physical vouchers from the respective retail channels?'* None of the consumers who accessed information through *TSP Retail Channels* reported receiving colour-coded physical vouchers from the stores. <sup>2</sup>

<sup>2</sup> \*This was verified by our Field Coordinators by visiting a few randomly selected stores in all four LSAs who found that colour-coded physical vouchers were not being offered in retail stores anymore.

### *Easy to Locate – Summary*

- **Third Party Websites/Apps (59%) were the most preferred and TSP Websites (6%) were the least preferred modes of information.** The use of digital modes was prominent all across, even in *Retail Channels* (18%), which were the second most preferred mode. The reasons for higher preference of Third Party modes and lower preference for TSP websites must be investigated further so as to enable easier access of information to subscribers and to take further strides towards digital inclusion.
- **98% of respondents found the modes user-friendly. TSP Websites were reported to be the least user-friendly.** Increasing the visibility of plans/packs lower than the existing plan and enabling filters for searching packs/plans based on price (low to high or vice versa) were the most suggested means of making the modes more user-friendly. These can be taken up as actionable points.
- **None of the respondents who accessed information through retail channels reported receiving colour-coded physical vouchers.** Further research is needed to investigate whether respondents did not prefer receiving physical vouchers or whether retail channels did not provide them out of their own volition.

## **B. Easy to Understand and Compare**

### **3.3 Ease of Understanding and Comparing Tariff-related Information**

Transparency of tariff-related information is crucial for consumers to make informed decisions about choosing a service provider or subscribing to tariff plans/packages which suit their needs. Informed decision-making on part of consumers is in turn necessary to sustain a healthy and competitive telecom market.

Just like the ease of locating and accessing information, the ease of understanding and comparing tariffs guides informed decision-making. More innovations in the telecom sector, and higher competition to retain existing consumers and acquire new consumers, has led to the offering of new and diverse services by service providers. Although this has delivered many benefits to consumers, the increased number and complexity of offerings has also led to more confusion among them.

In recent years, there has been an increased penetration of mobile services in semi-urban and rural markets where the presence of low-income groups is more. It becomes all the more important that tariff-



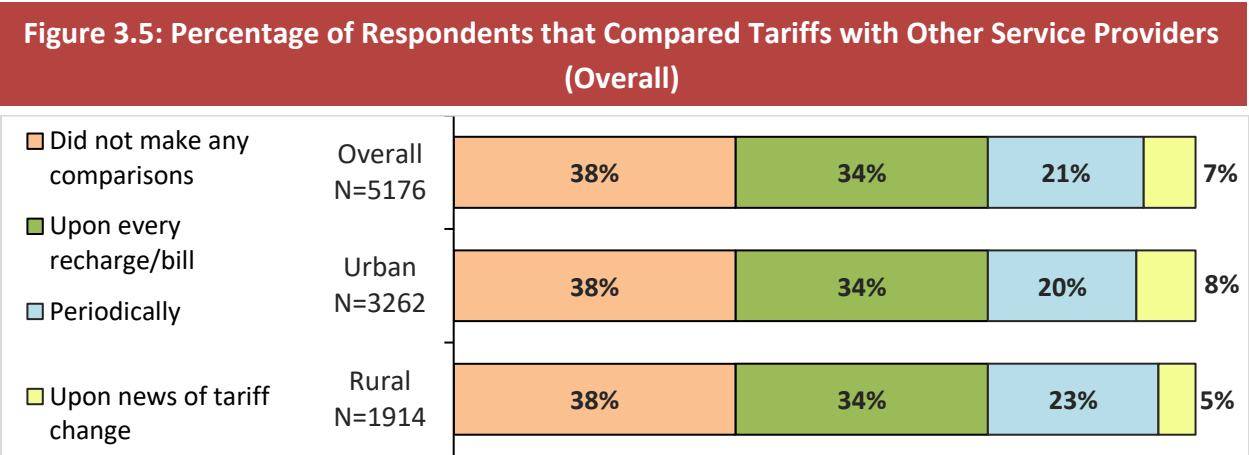
related information is presented in easily understandable and comparable ways because consumers from disadvantaged socio-economic backgrounds may not only find it more difficult to understand the nature of telecom services on offer, but also face bigger burdens upon choosing unsuitable tariff plans/packages.

### 3.3.A Consumers Making Tariff Comparisons with Other Service Providers

**Overall, Prepaid-Postpaid, Residential Area and LSA:**

In order to improve the ease of understanding and comparing tariff plans, it becomes necessary to understand existing practices of tariff comparisons among consumers. Respondents were asked ‘*How often do you compare tariffs offered by various Service Providers?*’ This question was asked to all the respondents. As depicted in Figure 3.5, the percentage of respondents that **Did Not Make Any Comparisons was the highest** at 38%. This was followed by respondents who made *Comparisons Upon Every Recharge/Billing Cycle* at 34%. The percentage of respondents who made *Comparisons Periodically* and who made *Comparisons Upon News of Tariff Change* was 21% and 7% respectively. **The total percentage of respondents who made some sort of tariff comparison was higher than those who did not.**

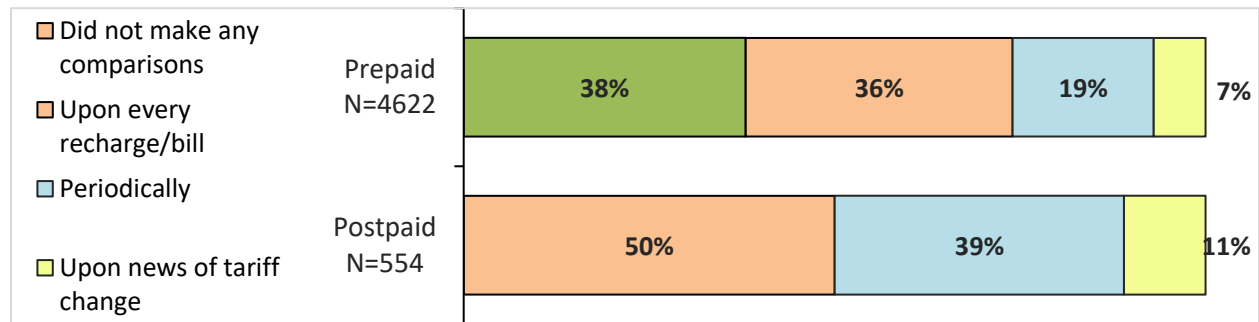
**Urban respondents tended to make tariff comparisons upon News of Tariff Change more than rural respondents.** This could be due to urban consumers having better access to information and thereby being more aware of news of tariff change. It was earlier seen that urban respondents relied on Third Party Websites/Apps more than rural consumers. Since Third Party Websites/Apps are a neutral source which provide information about all TSPs, as opposed to TSP Websites/Apps/Retail Channels/Customer Care, this could also be a reason why urban consumers were more prone to making tariff comparisons upon *News of Tariff Change*.



Coming to the trends of tariff comparison among prepaid and postpaid subscribers, half of the latter did not make any tariff comparisons while 39% made periodic comparisons and 11% made comparisons upon

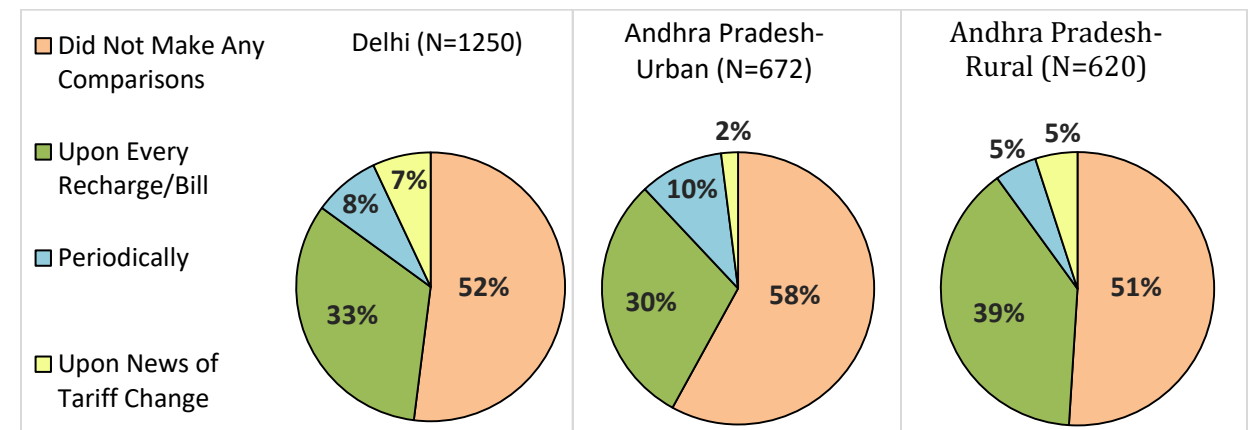
news of tariff change. Those who made comparisons upon every recharge/bill was the largest category among prepaid subscribers (38%) whereas none of the postpaid subscribers made comparisons at this frequency. The same is represented in Figure 3.6.

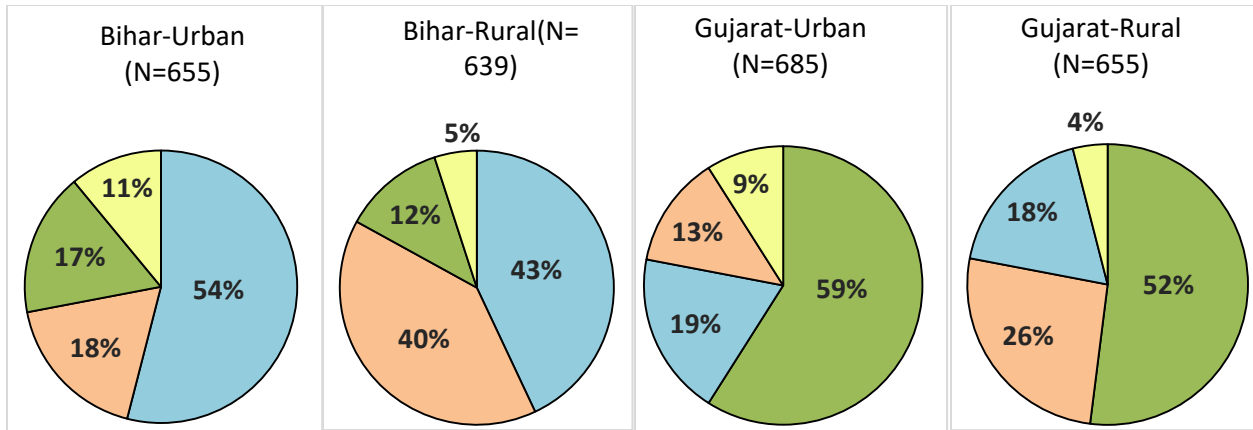
**Figure 3.6: Percentage of Respondents that Compared Tariffs with Other Service Providers (Prepaid-Postpaid)**



Over half the respondents in Delhi and Andhra Pradesh *Did Not Make Any Comparisons*. Respondents in Gujarat tended to make tariff comparisons the most with over half of them making comparisons *Upon Every Recharge/Bill*. A majority of respondents in Bihar made *Periodic* comparisons of tariffs. Urban respondents in Bihar made comparisons *Upon News of Tariff Change* the most. The same is depicted in Figure 3.7.

**Figure 3.7: Percentage of Respondents that Compared Tariffs with Other Service Providers (LSA)**



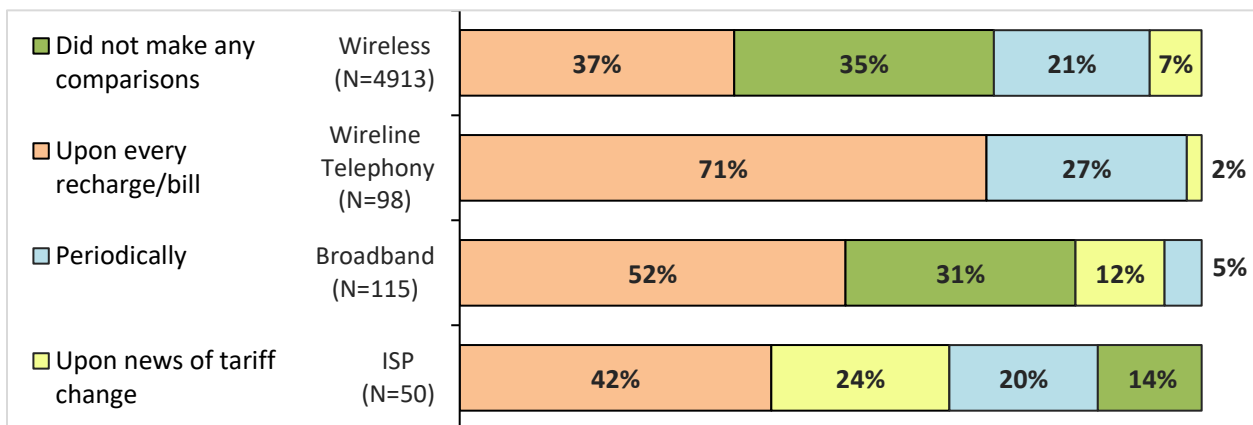


### Type of Subscription:

As depicted in Figure 3.8, frequency of tariff comparisons by respondents varied across different types of subscribers. The trends of wireless subscribers closely matched the overall trends with the total percentage of those who made comparisons exceeding those who did not.

Wireline telephony subscribers were the most infrequent in making tariff comparisons. Almost three-fourths of them *Did Not Make Any Comparisons* whereas 27% of them compared *Periodically* and 2% made comparisons *Upon News of Tariff change*. None of the wireline telephony subscribers had made comparisons *Upon Every Billing Cycle*. TSPs are not given to revising tariff rates for wireline telephony services as frequently as they do wireless services making it a possible reason for a majority of wireline telephony subscribers making infrequent tariff comparisons. Broadband and ISP subscribers made tariff comparisons more frequently than wireline telephony subscribers. However, similar to the overall trends, a majority of them did *Not Make Any Comparisons*.

**Figure 3.8: Percentage of Respondents that Compared Tariffs with Other Service Providers (Subscription Category)**



### 3.3.B Consumers' Awareness of OTT Services

The telecom industry is dynamic and undergoing constant evolution due to adoption of newer technologies and changing business environments. Having begun with telegraph and wireline telephony services, the telecom industry is now providing voice, data and multimedia services in a mobile environment (Sujata et al 2015). OTT services is the latest addition to the TSPs' ever-evolving set of offerings. OTT platforms deliver audio, video and other media over the internet, bypassing the traditional operator's network. Popular examples of OTT platforms are Disney+ Hotstar, Amazon Prime Video and Netflix.

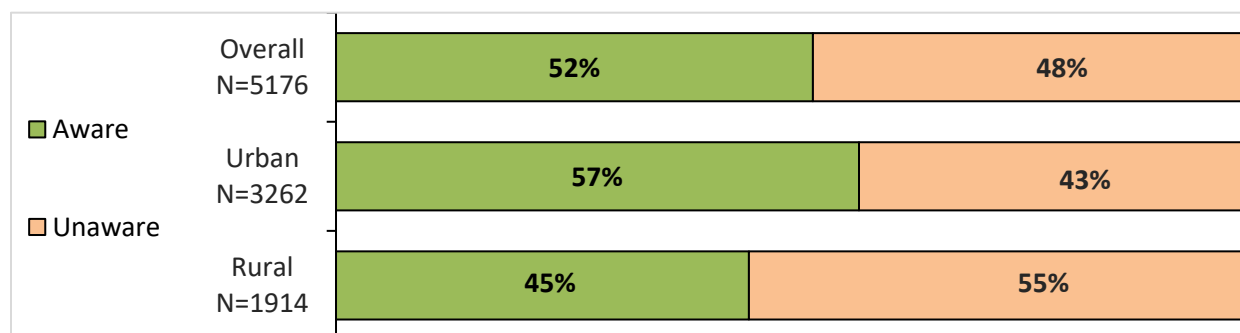
The penetration of OTT platforms has increased because of support from technological advances such as smartphones and high-speed internet. TSPs act as carriers or distribution channels for OTT platforms. They benefit from the boost to their data revenues driven by data usage by consumers accessing OTT platforms.

#### Overall, Prepaid-Postpaid, Residential Area and LSA:

All the respondents were asked, *'Are you aware about the Over the Top (OTT) services offered by service providers along with tariff offers/ Vouchers?'* When required, OTT was explained to them in the following way: *'Over the Top (OTT) - When a provider delivers audio, video and other media over an IP network (such as the internet), bypassing the traditional operators' network completely.'*

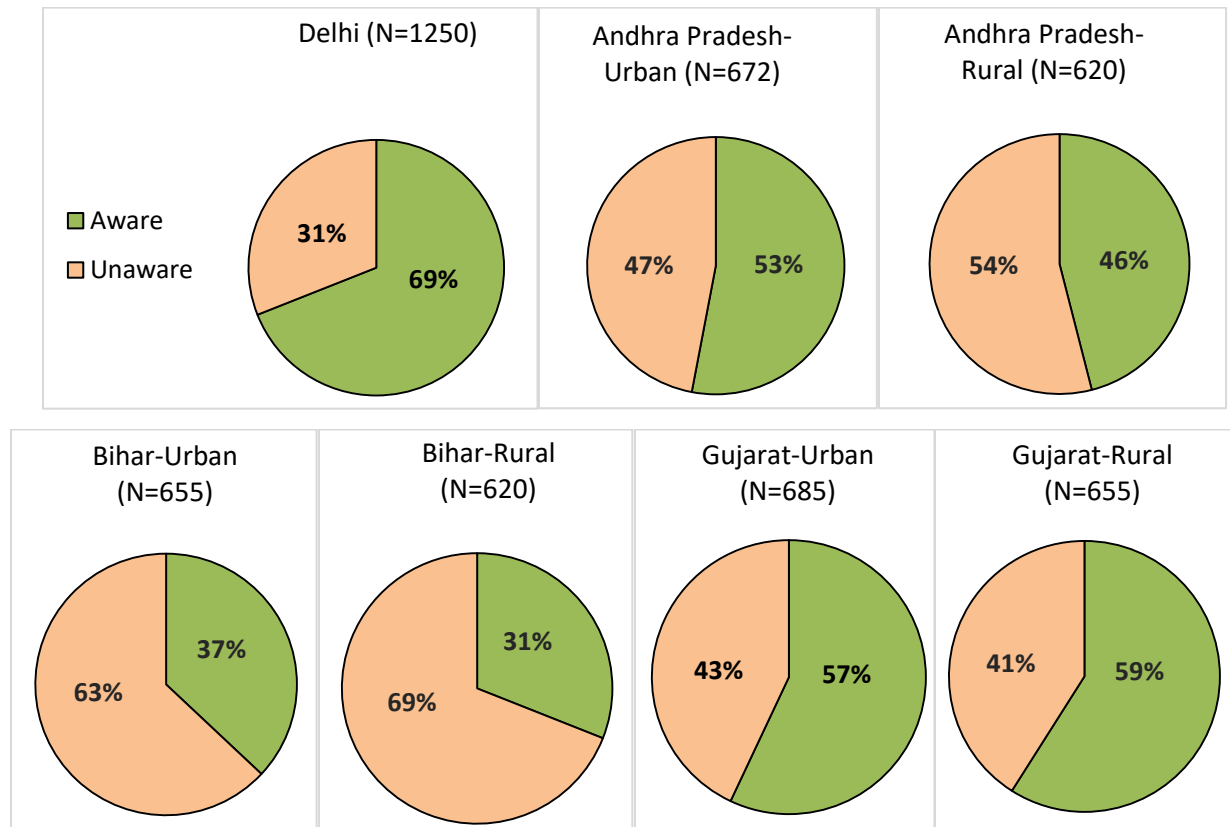
**Over half the respondents surveyed were aware that TSPs offered OTT services.** The trends were similar among prepaid and postpaid subscribers. Given that TSPs started offering OTT services as recently as 2018, the awareness levels can be considered as relatively high having reached over 50% in 4 years. **Respondents in urban areas and LSAs with higher socioeconomic rankings were more aware.** 57% of urban respondents and 45% of rural respondents were aware. The same is represented in Figure 3.9.

**Figure 3.9: Percentage of Respondents Aware of OTT Services Provided by TSPs (Overall)**



Delhi had the highest percentage of respondents that were aware at 69%. This was followed by Gujarat and Andhra Pradesh. Respondents in Bihar were least aware with 37% in urban areas and 31% in rural areas. This is depicted in Figure 3.10.

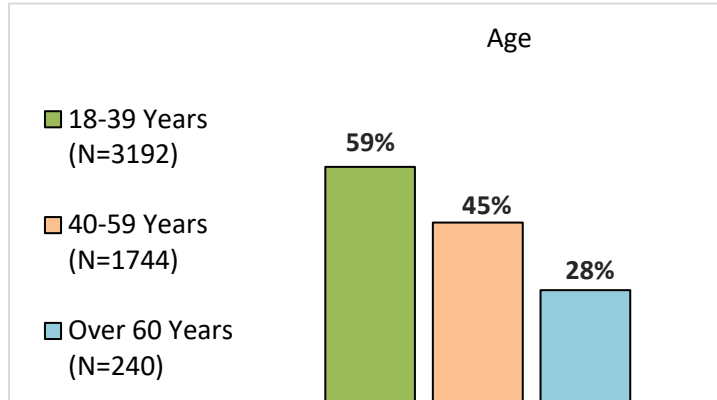
**Figure 3.10: Percentage of Respondents Aware of OTT Services Provided by TSPs (LSA)**



**Age Categories:**

If we look at awareness levels according to age category, **higher awareness levels corresponded with younger age groups**. Nearly 60% of respondents who belonged to the *18-39 years* age group were aware, 45% of respondents who belonged to the *40-59 years* age group were aware and 28% of respondents who belonged to the *60 and above* were aware. This is depicted in Figure 3.11.

**Figure 3.11: Percentage of Respondents Aware of OTT Services Provided by TSPs (Age)**



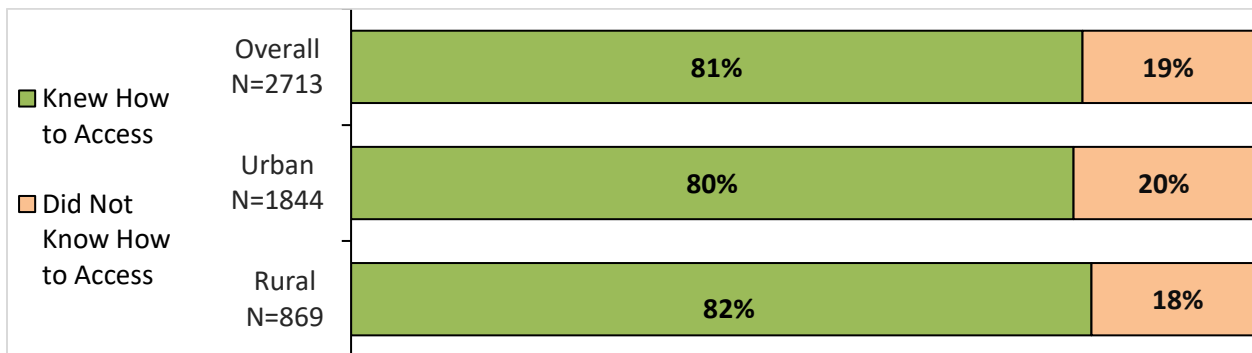
### 3.3.C Consumers’ Knowledge of Accessing OTT Services

#### Overall, Prepaid-Postpaid, Residential Area and LSA:

Those respondents who were aware of OTT were further asked, *‘Do you know how to access Over The Top (OTT) Services?’* Over 80% of those who were aware, also knew how to access OTT, both among prepaid and postpaid subscribers. There was not a significant difference between urban and rural areas, with respondents from rural areas being slightly more knowledgeable of accessing OTT. This is depicted in Figure 3.12.

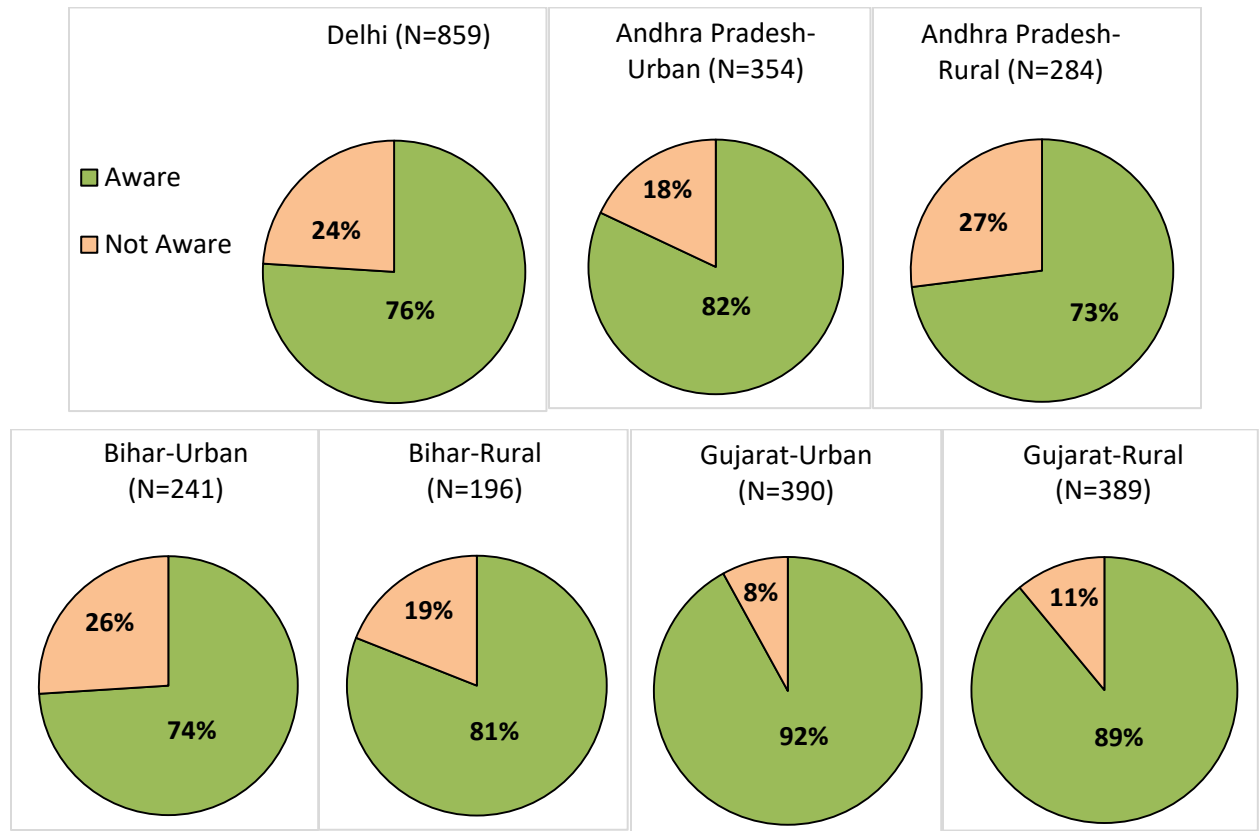
These trends suggest that awareness of OTT services invariably lead to higher levels of access or usage. Moreover, the urban-rural trends suggest that rural consumers, who are less likely to be able to access OTT through other devices such as computers or smart televisions when compared to urban consumers, find it more convenient to access OTT offered as bundled services by TSPs through their mobile devices.

**Figure 3.12: Percentage of Respondents That Knew How to Access of OTT (Overall)**



As represented in Figure 3.13, respondents in Gujarat were most aware of how to access OTT, followed by Bihar, AP-Telangana and Delhi. Although Bihar showed low levels of OTT awareness, over 75% of respondents who were aware, also knew how to access OTT.

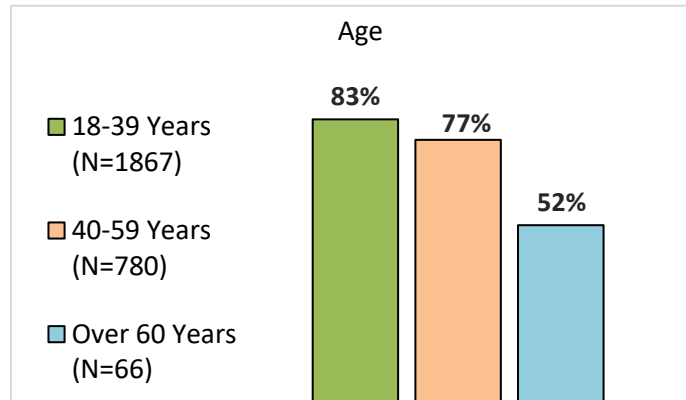
**Figure 3.13: Percentage of Respondents That Knew How to Access of OTT (LSA)**



**Age Categories:**

Similar to the trends of OTT awareness, knowledge of how to access OTT services corresponded with younger age groups. As seen in Figure 3.14, 83% of respondents in the '18 to 39 years' age group, 77% of respondents in the '40 to 59 years' age group, and 52% of respondents who were 'over 60 years' of age knew how to access OTT.

**Figure 3.14: Percentage of Respondents That Knew How to Access of OTT (Age)**



### 3.3.D Consumers' Opinions on Bundled Offers

Bundling is the grouping of various telecommunications and non-telecommunication services and marketing them as a specially priced package. TSPs provide bundled services in order to reduce expenses involved in separately marketed services. Services are bundled in a way that they are complementary to each other. For example, data services are often bundled with a subscription to OTT services.

The fast-changing nature of the telecommunications sector has given rise to many challenges. Most recently, the exponential growth of OTT platforms has posed a threat to TSPs' revenues. While OTT platforms utilize the infrastructure developed by TSPs which needs continuous investment, they do not directly contribute to TSPs' revenues and instead cut down the latter's revenues by offering cheaper alternatives, particularly in messaging services.

On the other hand, OTT platforms, especially those that provide video and audio services require high bandwidth to offer seamless streaming and are sometimes required to pay charges for higher bandwidth consumption. Bundling is therefore a strategy that is used to reduce operational costs of both TSPs and OTT platforms or other types of non-telecommunication service providers.

Bundling is also done to promote the sale of different services to consumers by persuading them to buy a package of services at a lower price than the sum of independently priced standalone services. It offers more value for less price. The convenience of receiving one bill instead of multiple bills is another benefit for consumers.

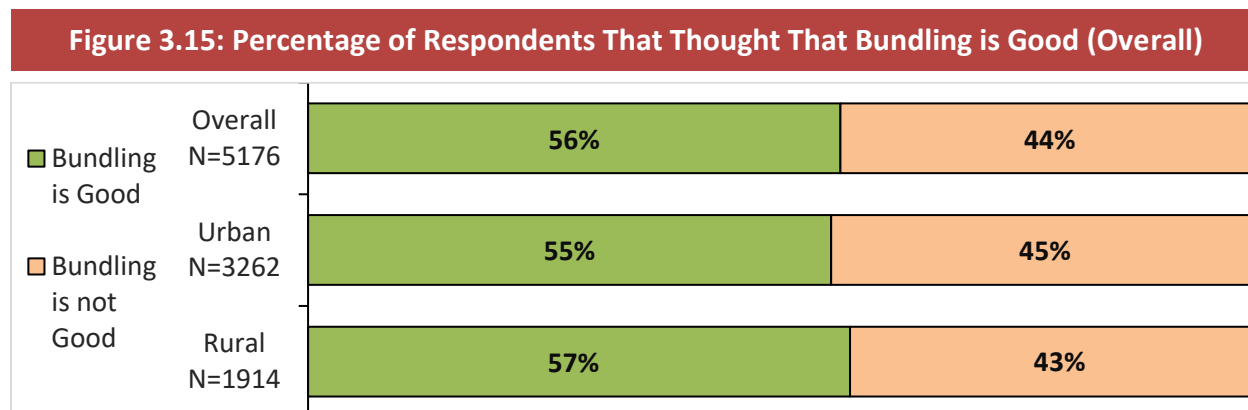


### Overall, Prepaid-Postpaid, Residential Area and LSA:

In order to understand consumer views on bundling, all the respondents were asked, *'Do you think the bundling/packaging of telecom and non-telecom products such as Over the Top (OTT) applications, DTH (Direct to Home) etc. are good for the consumer?'* When required, bundling was defined as *'A grouping various telecommunications services -- wire line and/or wireless -- as a package to increase the appeal to potential customers and reduce advertising, marketing and other expenses associated with delivering multiple services. For example, a bundled package could include long distance, cellular, Internet and paging services.'*

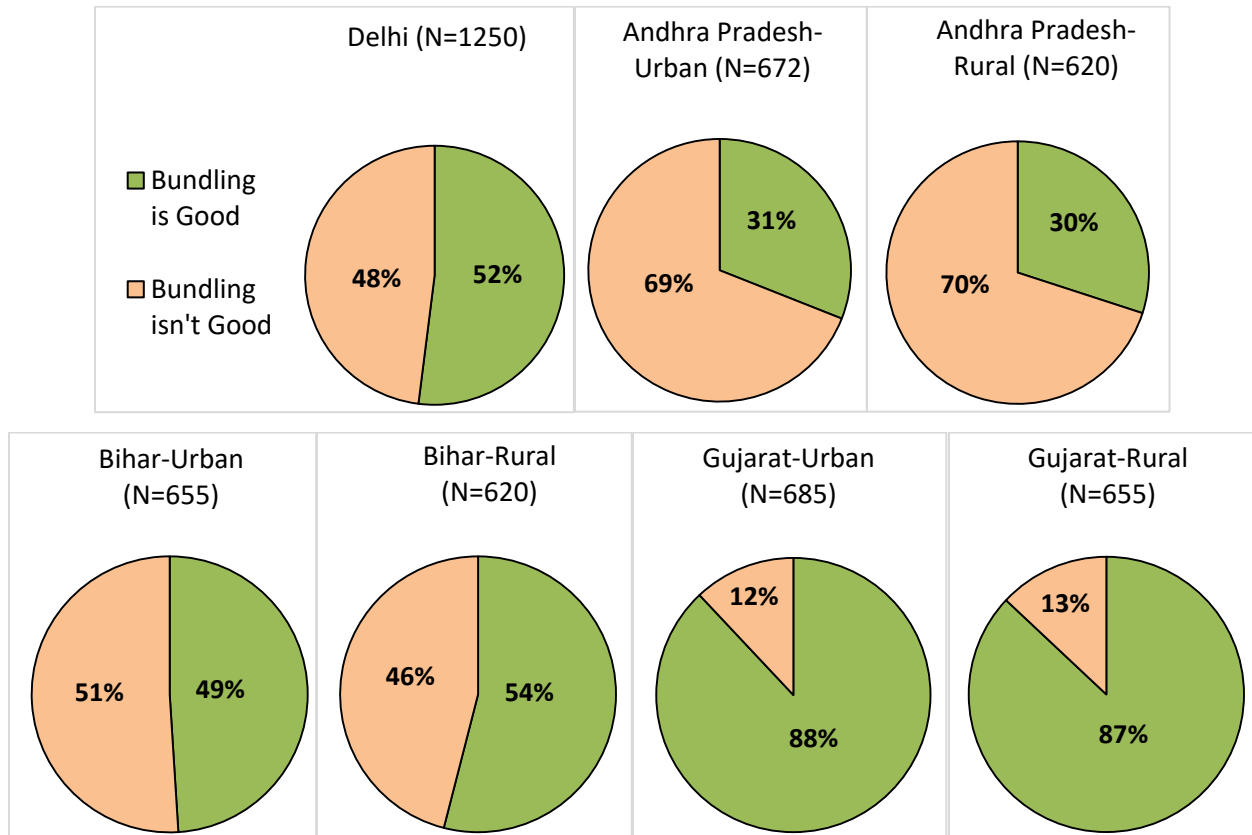
As depicted in Figure 3.15, **over half the respondents felt that bundling is good for consumers.** A slightly higher percentage of postpaid subscribers (63%) than prepaid subscribers (55%) thought that bundling is good. Many respondents were unaware of bundling and their responses were based on an understanding of bundling that developed during the course of the survey. **Almost three-fourths of respondents who were aware of OTT services, felt that bundling is good suggesting that consumers who are inclined to using multiple telecom and non-telecom services find bundled services useful as opposed to standalone services.**

The percentage of rural respondents that felt that bundling is good was slightly higher at 57% when compared to urban respondents at 55%. This may be due to the fact that bundled packages are an economical alternative to purchasing multiple standalone services.



The trends varied widely across LSAs as shown in Figure 3.16. Over three-fourths of respondents in Gujarat felt that bundling is good whereas one-third of respondents in Andhra Pradesh felt so, the highest and lowest among all LSAs respectively. Delhi and Bihar were similar to the overall trends with around half of them thinking that bundling is good.

**Figure 3.16: Percentage of Respondents That Thought That Bundling is Good (LSA)**



Although bundling offers benefits such as convenience and cost-effectiveness to consumers, it also has disadvantages such as reduced transparency, incomparability of price, and having components that do not meet the needs of individual consumers. Given that bundling has both pros and cons for consumers, it is reasonable that half of the consumers felt that bundling is good for consumers and the other half did not think so.

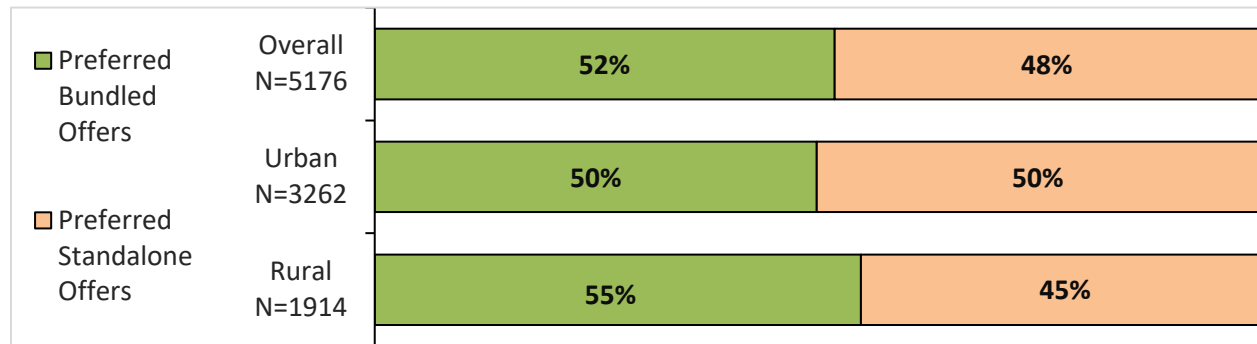
### 3.3.E Consumers' Preference for Bundled and Standalone Offers

#### Overall, Prepaid-Postpaid, Residential Area and LSA:

All the respondents were asked, *'Given a choice between a bundled/package offer telecom and non-telecom products such as Over the Top (OTT) applications, DTH (Direct to Home) and standalone telecom tariff. What would you prefer?'* 52% of respondents preferred bundled over standalone offerings. 4% of respondents who thought that bundling is good for consumers in general, did not prefer bundled packages for themselves. Like the previous indicator, postpaid subscribers (62%) preferred bundled offers more than prepaid subscribers (51%). Those who were likely to use multiple telecom and non-telecom services preferred bundling as almost three-fourths of those who were aware of OTT preferred bundling as

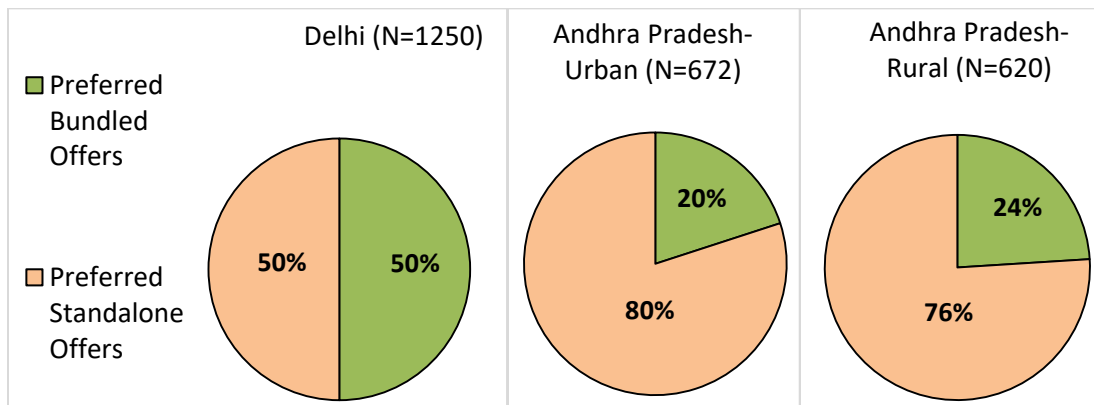
compared to only 33% of those who were unaware of OTT. Rural respondents preferred bundled offerings slightly more than urban consumers as depicted in Figure 3.17.

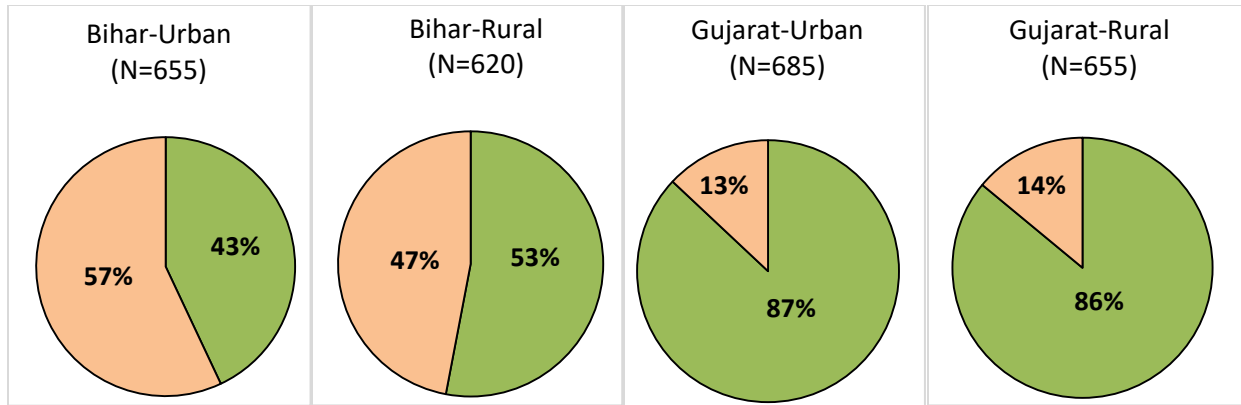
**Figure 3.17: Percentage of Respondents That Preferred Bundled Over Standalone Offers (Overall)**



The LSA trends for this indicator were similar to those of consumers’ opinions on bundling. Over 85% of respondents in Gujarat preferred bundled products whereas half the respondents in Delhi preferred the same. Preference for bundled offerings was 10% higher in rural as opposed to urban Bihar. Less than a quarter of respondents in Andhra Pradesh preferred bundled offerings. This is depicted in Figure 3.18.

**Figure 3.18: Percentage of Respondents That Preferred Bundled Over Standalone Offers (LSA)**





### 3.3.F Consumers' Preferences in Viewing Breakdown of Rates in Bundled Offerings

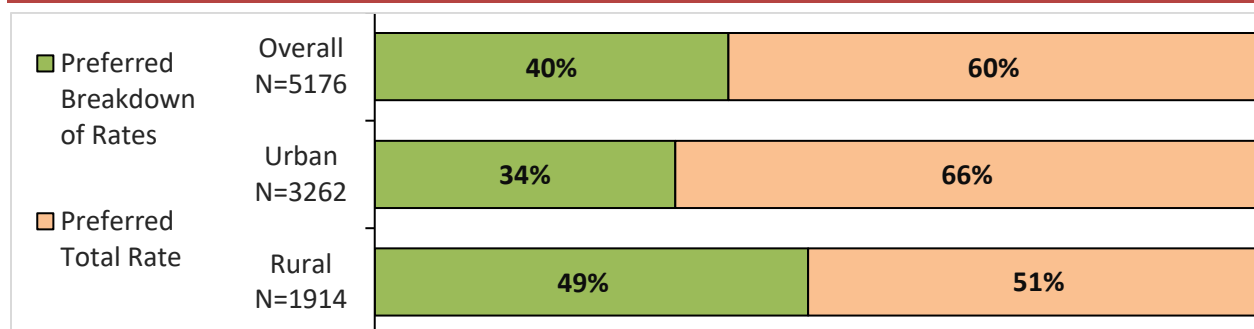
#### Overall, Prepaid-Postpaid, Residential Area and LSA:

Respondents who preferred bundled over standalone offerings were further asked, *'Given a choice would you prefer to have the break-up of charge/rate in the tariff offer in case of bundled offers?'*

40% of respondents preferred to view the breakdown of rates in bundled offers and 60% did not. This suggests that while most consumers prefer a simpler buying experience and do not wish to inspect the rate details of all the bundled components, a sizable proportion of consumers do prefer viewing the break-up of rates. **42% of prepaid subscribers preferred viewing the breakdown of rates whereas only 27% of postpaid subscribers preferred this.** This is represented in Figure 3.19.

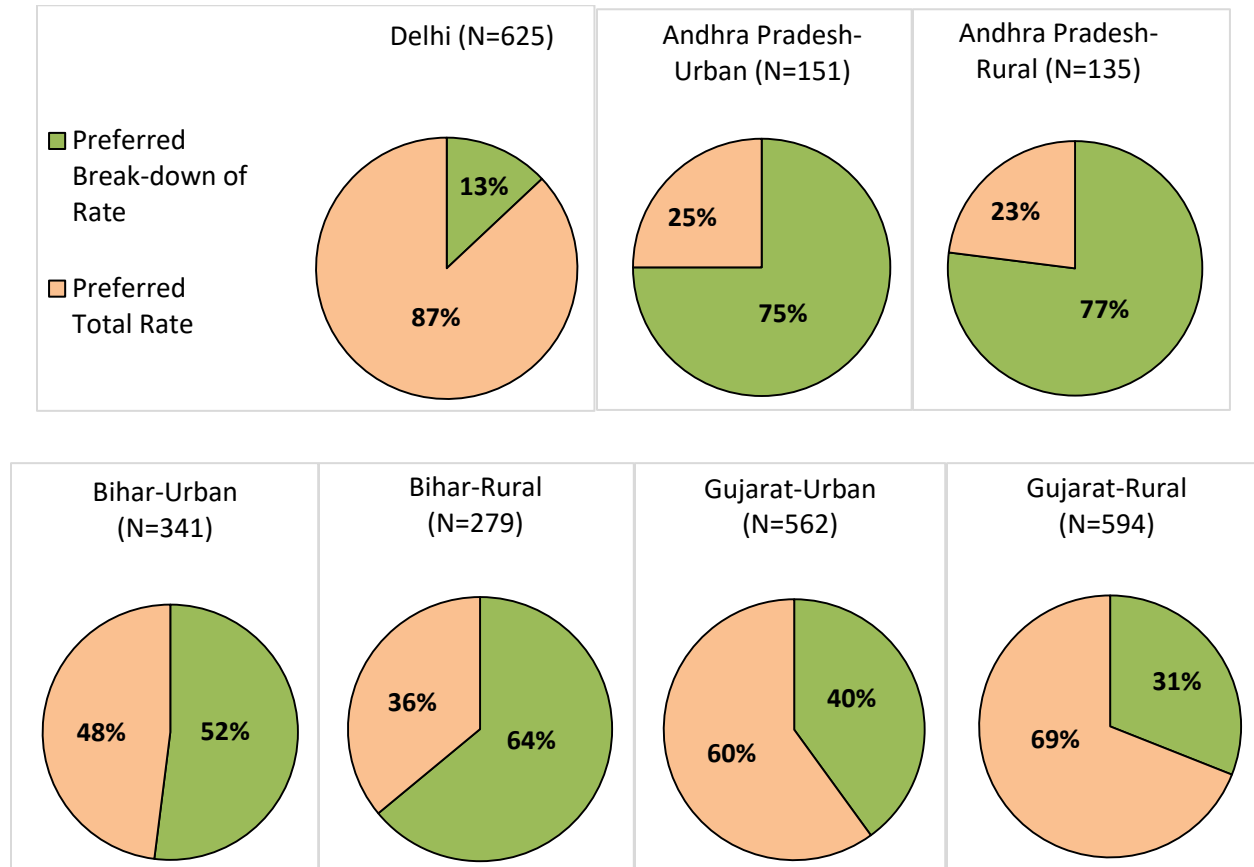
**Rural respondents preferred to view the breakdown more than urban consumers at 49% and 34% respectively.** This may be because rural consumers are likely to be more cautious in their decision-making since purchasing ill-suited services tends to have a bigger financial burden on them.

**Figure 3.19: Percentage of Respondents That Preferred to View Breakdown of Rates in Bundled Offers (Overall)**



The trends varied across LSAs. Respondents in Andhra Pradesh preferred the breakdown of bundled offers the most although contrastingly, they were the least to think that bundling is good and preferred standalone offers more than bundled. Over half the respondents in Bihar preferred viewing the breakdown of rates whereas it was less than half in Gujarat. Respondents in Delhi were the least to want to view the breakdown of rates at 13%. The same is depicted in Figure 3.20.

**Figure 3.20: Percentage of Respondents That Preferred to View Breakdown of Rates in Bundled Offers (LSA)**



**Easy to Understand and Compare – Summary**

- **Most respondents (62%) were found to be making tariff comparisons whereas a significant proportion (38%) did not make any comparisons.** The reasons for the latter need to be investigated in order to determine whether consumers do not prefer to make comparisons or they wish to compare but are unable to do so.
- **52% of respondents were aware of OTT.** Given that OTT services were introduced as recently as 2018, the awareness levels can be considered to be high. Awareness was at 57% in urban

areas and 45% in rural areas. It was higher among younger age groups. 59% of those in 18 to 39 years age group, 45% in the 40-59 years age group, and 28% in the '60 years and above' age group. There is potential to increase awareness among consumers in rural areas, those with lower socio-economic rankings and older age groups.

- Awareness of OTT corresponded with higher usage. **A large majority (81%) of those who were aware of OTT, also knew how to access OTT.**
- **56% of respondents thought that bundling is good whereas 52% preferred bundled over standalone offers.** Those who were likely to use multiple telecom and non-telecom services preferred bundling as almost three-fourths of those who were aware of OTT preferred bundling as compared to only 33% of those who were unaware. 49% of rural respondents as compared

## ***C. Whether Tariffs on Offer are Serving the Needs of Consumers***

### **3.4.A Adequacy of Available Tariff Offers**

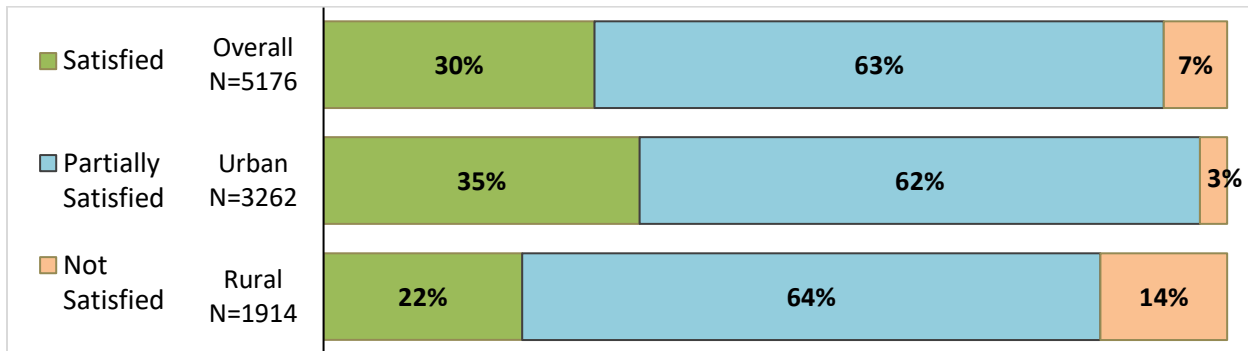
India's telecommunication sector caters to a variety of users with different needs and requirements. It is not possible to meet such a range of consumer requirements with a few tariff plans. In order to provide tariffs that are suitable to a wide range of consumers, and in order to compete in the industry, TSPs provide several tariff plans of different kinds. They are constantly evolving and introducing new types of tariff plans in order to meet the changing demands. It becomes important to understand whether tariffs on offer are indeed serving consumer needs from the consumers' perspective.

#### **Overall, Prepaid-Postpaid, Residential Area and LSA:**

In order to understand the satisfaction levels of consumers with available tariff offers, respondents were asked, ***'Do you think there are enough tariff offers/recharge packs available to suit the requirements of the customers?'*** This question was asked to all the respondents.

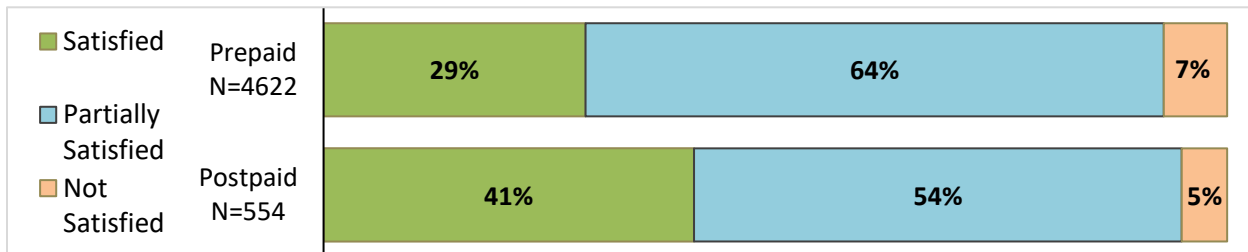
**Over 90% of respondents expressed some level of satisfaction with the choice of tariff availability.** 30% of them were completely satisfied whereas a majority of them, 63%, were partially satisfied. A small percentage of **7% of the respondents were not satisfied.** Urban respondents were more satisfied than rural respondents. **Only 3% of urban respondents were not satisfied whereas 14% of rural respondents were not satisfied.** The same is depicted in Figure 3.21.

**Figure 3.21: Percentage of Respondents That Were Satisfied with Available Tariff Offers (Overall)**



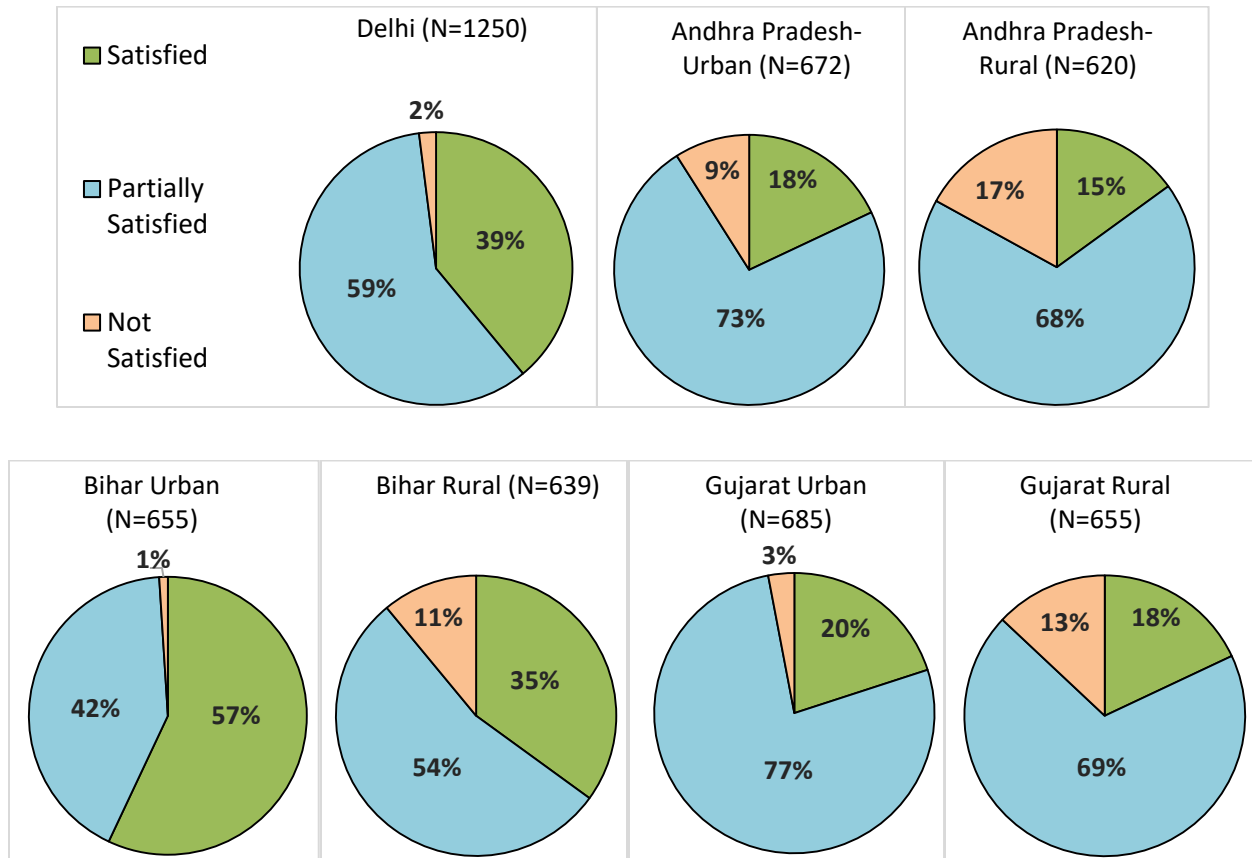
41% of postpaid subscribers were satisfied with the existing tariff offers, higher than the 29% of prepaid subscribers. This is represented in Figure 3.22.

**Figure 3.22: Percentage of Respondents That Were Satisfied with Available Tariff Offers (Prepaid-Postpaid)**



Respondents in urban Bihar expressed the highest satisfaction levels. 57% were completely satisfied whereas 1% were not satisfied. However, the trends between urban and rural Bihar varied. In rural Bihar, 35% of rural respondents were completely satisfied whereas 11% were not satisfied. In Delhi, 39% were completely satisfied and 2% were not satisfied. The trends between Gujarat and Andhra Pradesh were similar, although respondents in the latter were more unsatisfied. The same is depicted in Figure 3.23.

**Figure 3.23: Percentage of Respondents That Felt That Available Tariff Offers are Adequate (LSA)**

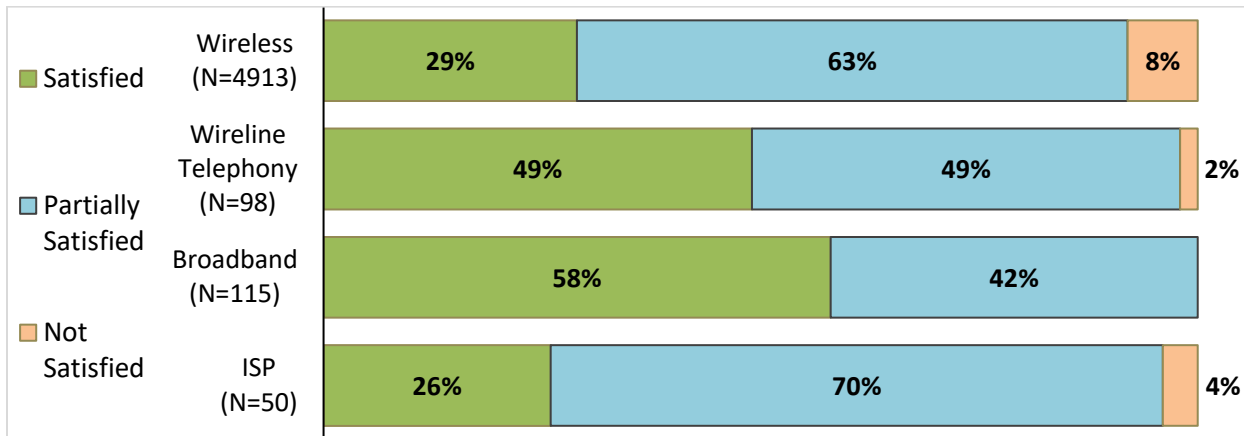


**Type of Subscription:**

Broadband and wireline telephony respondents expressed the highest satisfaction levels. 58% and 49% respectively were completely satisfied. ISP respondents were mostly somewhat satisfied whereas **wireless respondents were least satisfied with the choice of tariff availability**, as seen in Figure 3.24.



**Figure 3.24: Percentage of Respondents That Felt That Available Tariff Offers are Adequate (Subscription Category)**



### 3.4.B Consumers' Recommendations for Additional Tariff Plans to be Made Available

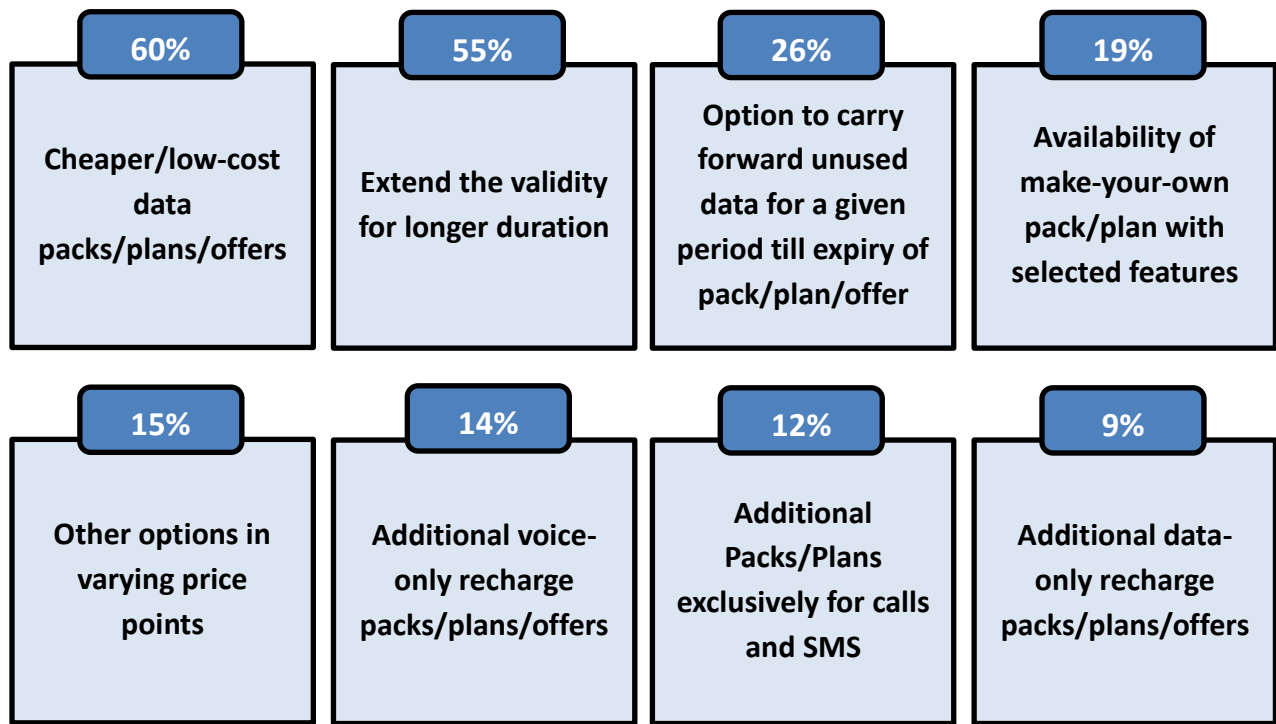
#### Overall:

With regard to the choice of tariff availability, respondents were further asked *'In addition to the existing plans, which tariff offer/recharge packs do you feel should be made available by the Service Providers?'* A majority of them, 60%, stated that cheaper or low-cost data plans should be made available. This was closely followed by respondents, 55% of whom desired that the validity period of tariff plans should be extended.

The option to carry forward unused data for a given day till the expiry period of the pack/plan was the third most popular choice, preferred by 26% of respondents. Having the option of make-your-own-plans with selected features was the fourth most preferred. Respondents preferred more diversity in tariff plans at varying price points the most, followed by more diversity in voice-only plans, plans for SMS and calls and lastly in data-only plans. Figure 3.25 shows the different types of additional tariff plans preferred by consumers.

The findings suggest that most consumers are looking for more value for money within the existing tariff plans, preferring cheaper plans, longer validity periods, and the option to utilize unused data. More variety in tariff plans is also desired by consumers, though not as much.

**Figure 3.25: Percentage of Respondents That Suggested Other Tariff Plans to be Made Available**



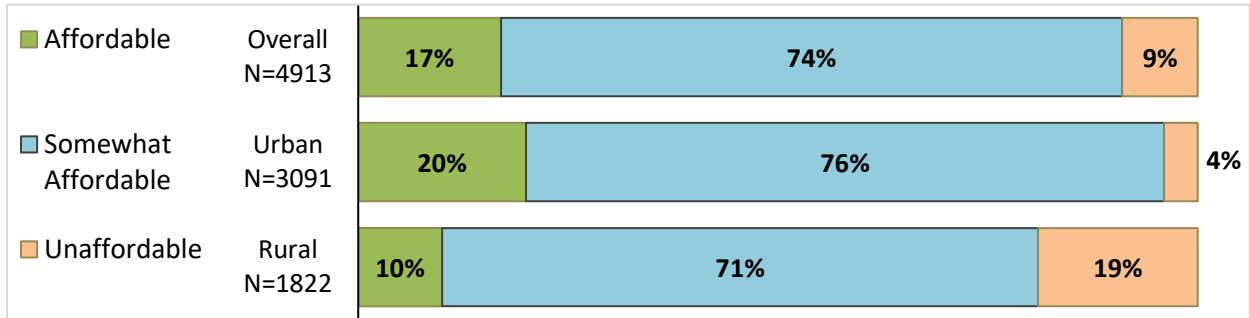
### 3.4.C Affordability of Tariffs for Wireless Subscriptions

Affordability represents the ability of an individual or a household to pay for a particular service. Affordability of tariffs is perhaps the most significant factor to be considered when surveying whether telecom tariffs on offer are serving consumer needs, because it impacts accessibility and usage of services especially among the impoverished classes. As seen in the findings from the previous indicator, better value for money was a major aspect that consumers found lacking in existing tariffs.

#### Overall, Residential Area and LSA:

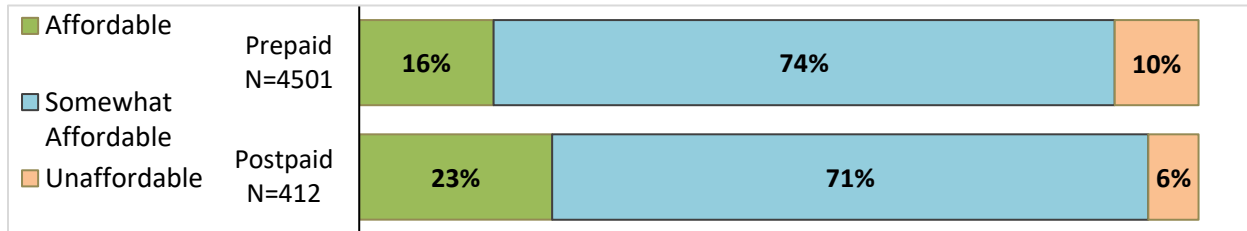
In order to assess affordability of wireless tariffs, respondents who were wireless subscribers were asked, *'What is your view on the affordability of mobile telecommunication tariff?'* **Three-fourths of the respondents felt that tariffs were somewhat affordable and 17% felt that they were very affordable. 9% of respondents did not find them affordable.** 4% of respondents in urban areas did not find tariffs affordable whereas, contrastingly, it was 19% in rural areas. This is depicted in Figure 3.26.

**Figure 3.26: Percentage of Respondents That Found Wireless Tariffs Affordable (Overall)**



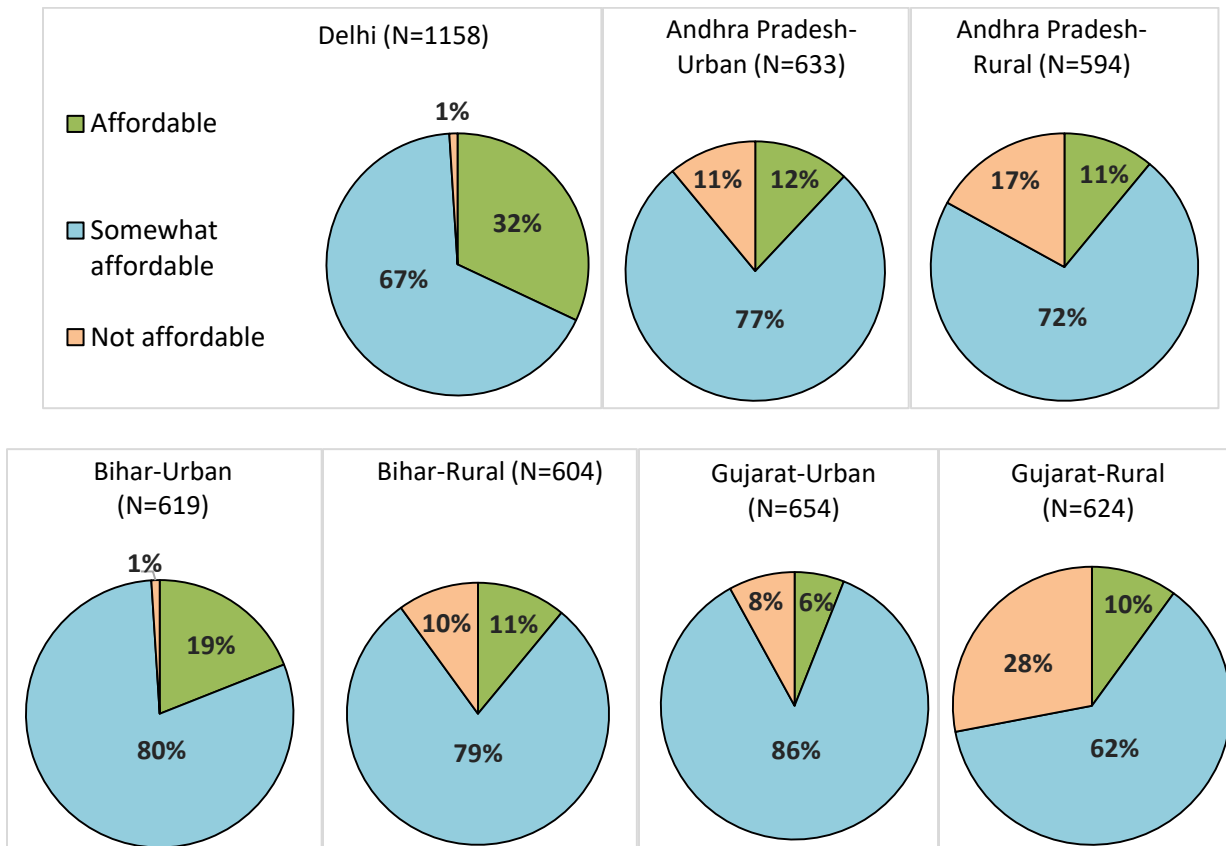
Postpaid subscribers found tariffs more affordable than prepaid subscribers. 10% of prepaid subscribers and 6% of postpaid subscribers did not find tariffs affordable. This is depicted in Figure 3.27.

**Figure 3.27: Percentage of Respondents That Found Wireless Tariffs Affordable (Prepaid-Postpaid)**



Respondents in Delhi found wireless tariffs were affordable the most. 32% and 67% found them very affordable and somewhat affordable respectively, only 1% found them not affordable. Delhi was followed by urban Bihar with 19% of them finding tariffs very affordable and 1% finding them not affordable. Respondents in rural Gujarat and rural Andhra Pradesh were the most to find tariffs not affordable, at 28% and 17% respectively. The same is depicted in Figure 3.28.

**Figure 3.28: Percentage of Respondents That Found Wireless Tariffs Affordable (LSA)**

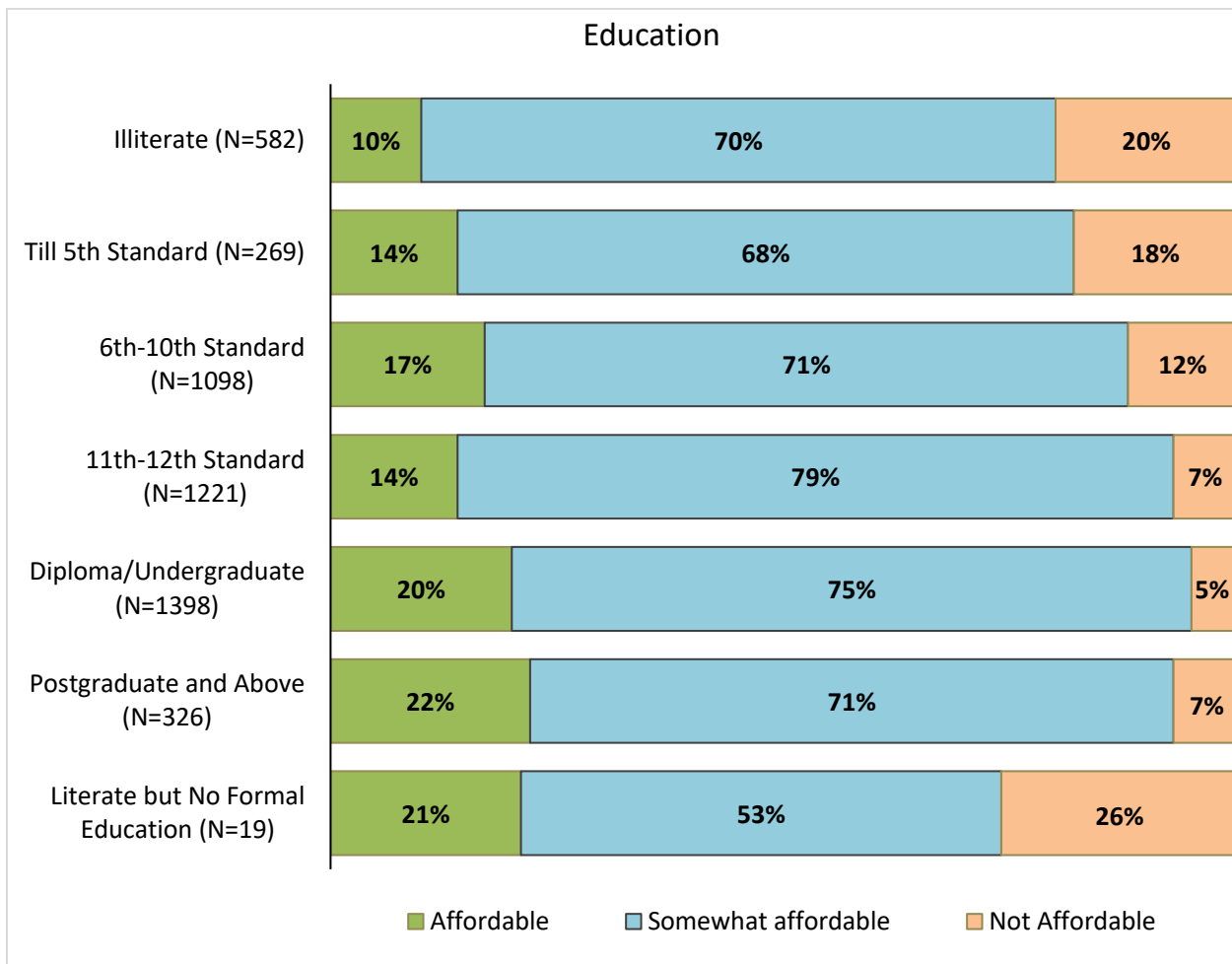
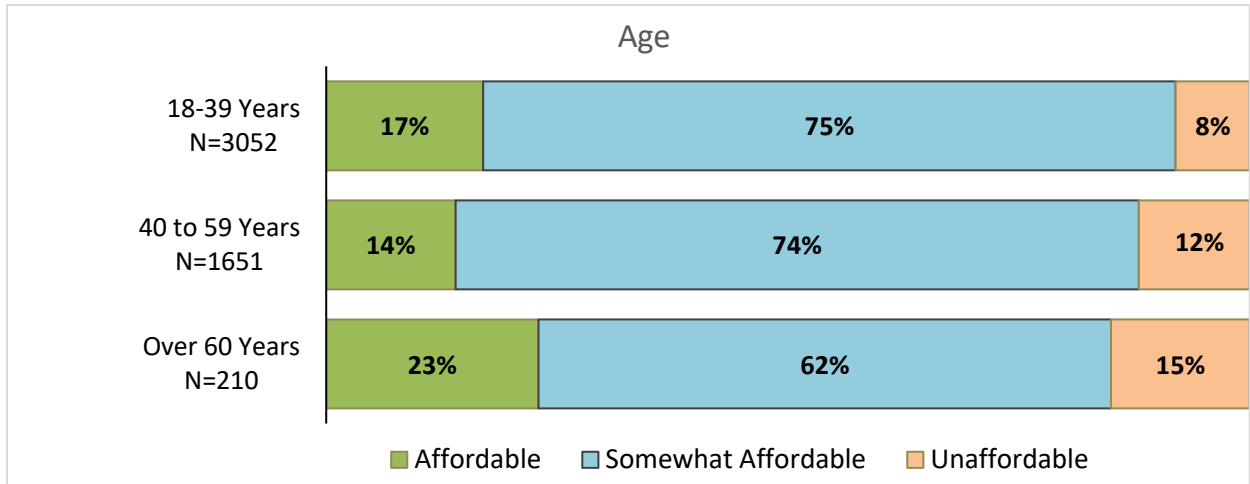


**A substantial proportion of consumers did not find tariffs affordable, especially in rural areas.** As evident, affordability strongly varies depending on factors such as age, gender, level of education and occupation of consumers. Therefore, it becomes necessary to consider consumers’ perception of affordability based on their socio-demographic profiles.

**Socio-demographic Variables:**

Affordability decreased with age as older respondents found tariffs more unaffordable than younger ones. The same can also be seen with education levels wherein lower education levels corresponded with lower affordability. This is depicted in Figure 3.29.

**Figure 3.29: Percentage of Respondents That Found Wireless Tariffs Affordable (Socio-demographic Variables)**



It can be said that, by and large, Wireless consumers find tariffs affordable. India's tele-density, or the number of telecom connections per 100 in a geographic area, had risen from 0.8% in 1994 to 89% in 2019 (TRAI, 2019). Wireless or mobile services had played a major role in this growth, which could not have happened without affordable tariff rates.

However, affordability is subject to socio-demographic factors as discussed above. **Those consumers with a low capacity to spend, not only find tariffs unaffordable but are also very sensitive to any tariff rate hikes.**

### *Whether Tariffs on Offer are Serving Consumer Needs – Summary*

- **Most respondents were not fully satisfied with the existing tariff offers.** While recommending additional tariff plans to be made available, most respondents seemed to look for higher value for money within the existing plans, preferring cheaper plans, longer validity periods and the option to utilize unused data. Some respondents preferred more variety in tariff plans such as voice-only, SMS-only and data-only plans.
- **Most respondents did not find tariffs affordable. 19% of rural respondents and 4% of urban respondents found tariffs unaffordable.** Affordability also decreased with age. Considering that a significant proportion of consumers, especially those who are socio-economically weaker, did not find tariffs affordable, the pricing policy could be reviewed to make it more affordable or provide more value for money.

# 4

## Consumers' Awareness of TRAI's Consumer Protection Measures

The telecom sector has changed drastically in recent years in relation to the nature and composition of tariffs, frequency of changes in tariff and the preferred modes of communication. Clarity of information is bound to suffer in such a dynamic and complex landscape, affecting consumers' decision-making abilities. The TRAI has also periodically received complaints from individual consumers regarding lack of transparency in the disclosure of information. The TRAI, which has been entrusted with safeguarding consumer interests, has introduced many measures and regulations in this regard.

### 4.1 Disclosure of Tariff-related Information

#### 4.1.A Consumers' Awareness of TRAI's Information Disclosure Mandate

Over the years, the TRAI has moved from 'fixation of tariff rates' to a forbearance regime where the TSPs have the freedom to design tariffs according to the prevailing market conditions. However, the forbearance is subject to adherence to principles such as transparency, non-discrimination and non-predation.

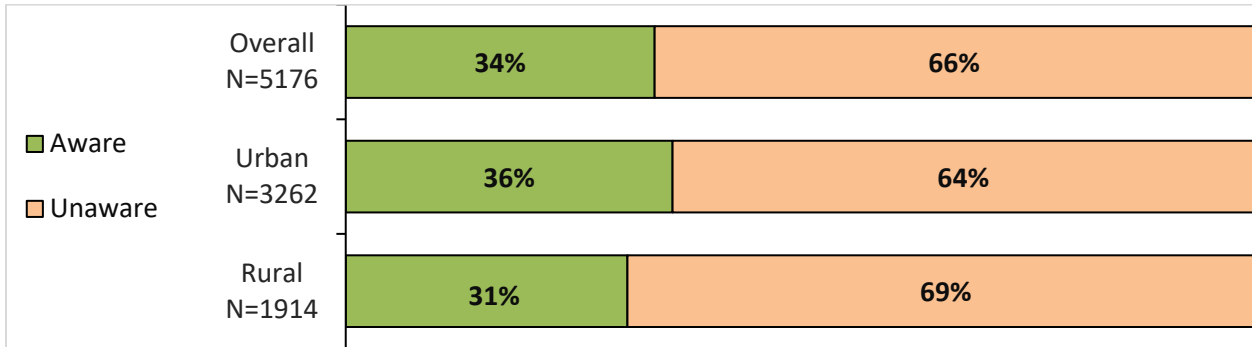
Perhaps the most important prerequisite to ensure this would be through a transparent communication of tariff-related information to consumers. As mentioned earlier, consumers are often faced with inadequate, misleading or unclear information which makes it difficult for consumers to make informed decisions which in turn is necessary to maintain a competitive market environment.

The TRAI has therefore mandated TSPs to publish all tariff-related information, in a manner as may be directed from time to time. This has been mandated through the 'Transparency in Publication of Tariff Orders, 2019'. It has specified formats for the publication or advertisement of plans and packs for prepaid and postpaid subscribers. It has also specified the manner in which tariff plans need to be updated in case of changes, on TSP websites, apps, customer care centre and retail stores.

#### Overall, Prepaid-Postpaid, Residential Area and LSA:

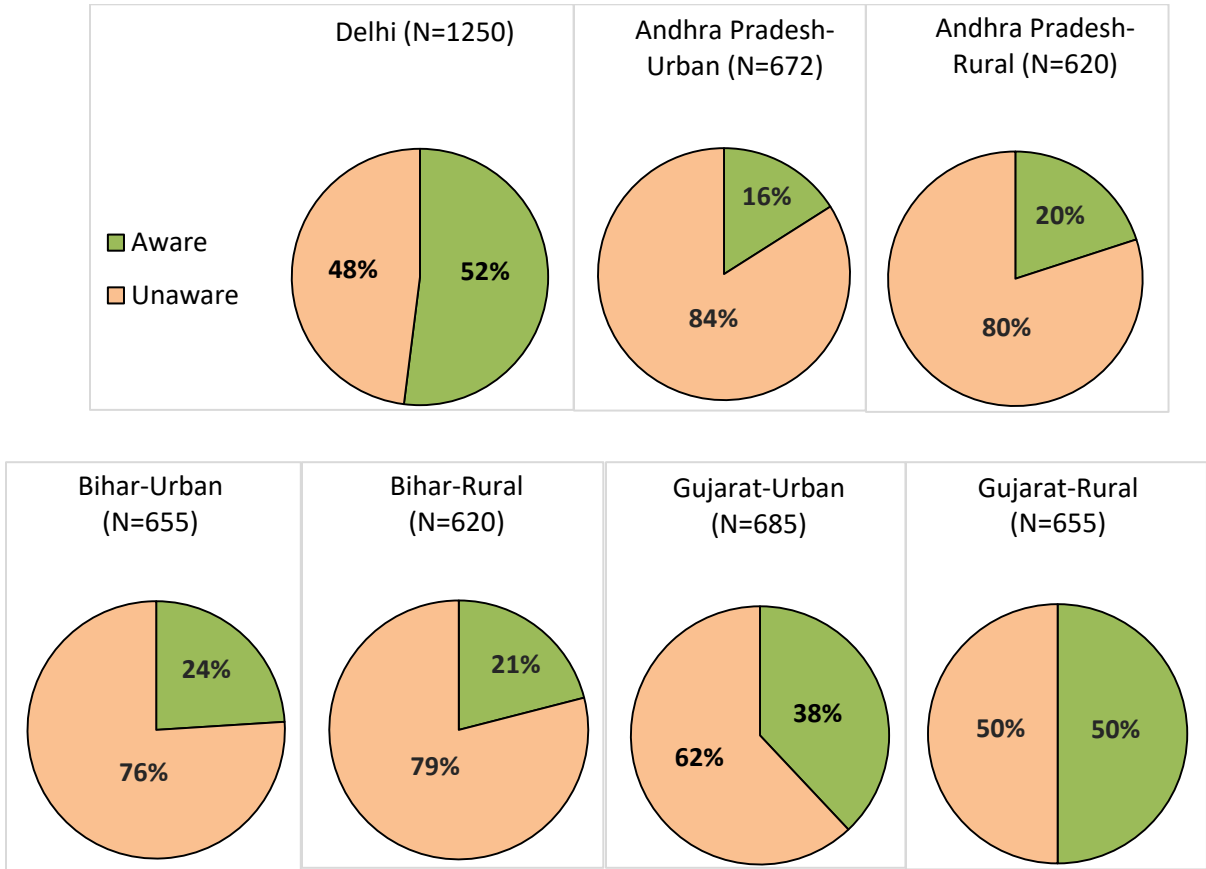
To gauge awareness levels of this mandate, respondents were asked, '*Are you aware that the Service Providers are required by Telecom Regulatory Authority of India (TRAI) to disclose all related information prominently?*'. This question was asked to all the respondents. **A little over one-third of respondents were aware. 34% of prepaid subscribers and 30% of postpaid subscribers were aware. Urban respondents were slightly more aware than rural respondents at 36% and 31% respectively.** This is depicted in Figure 4.1.

**Figure 4.1: Percentage of Respondents That Were Aware of TRAI’s Information Disclosure Mandate (Overall)**



In Delhi and rural Gujarat, over half the respondents were aware of the mandate. Urban Gujarat showed lower awareness levels than rural at 38%. Less than a quarter of the respondents in Andhra Pradesh and Bihar were aware, the lowest among all LSAs. The same is depicted in Figure 4.2.

**Figure 4.2: Percentage of Respondents That Were Aware of TRAI’s Information Disclosure Mandate (LSA)**





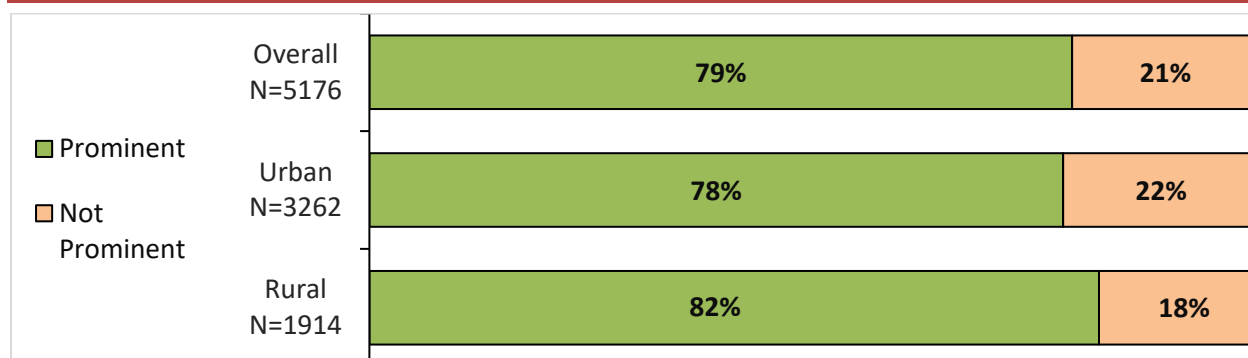
## 4.1.B Consumers' Experiences with Information Disclosure

### Overall, Prepaid-Postpaid, Residential Area and LSA:

In order to understand whether consumers experienced instances of information disclosure not being prominent, respondents were asked, *'Have you ever felt that some important information relating to tariff has not been disclosed prominently?'* This question was asked to all the respondents.

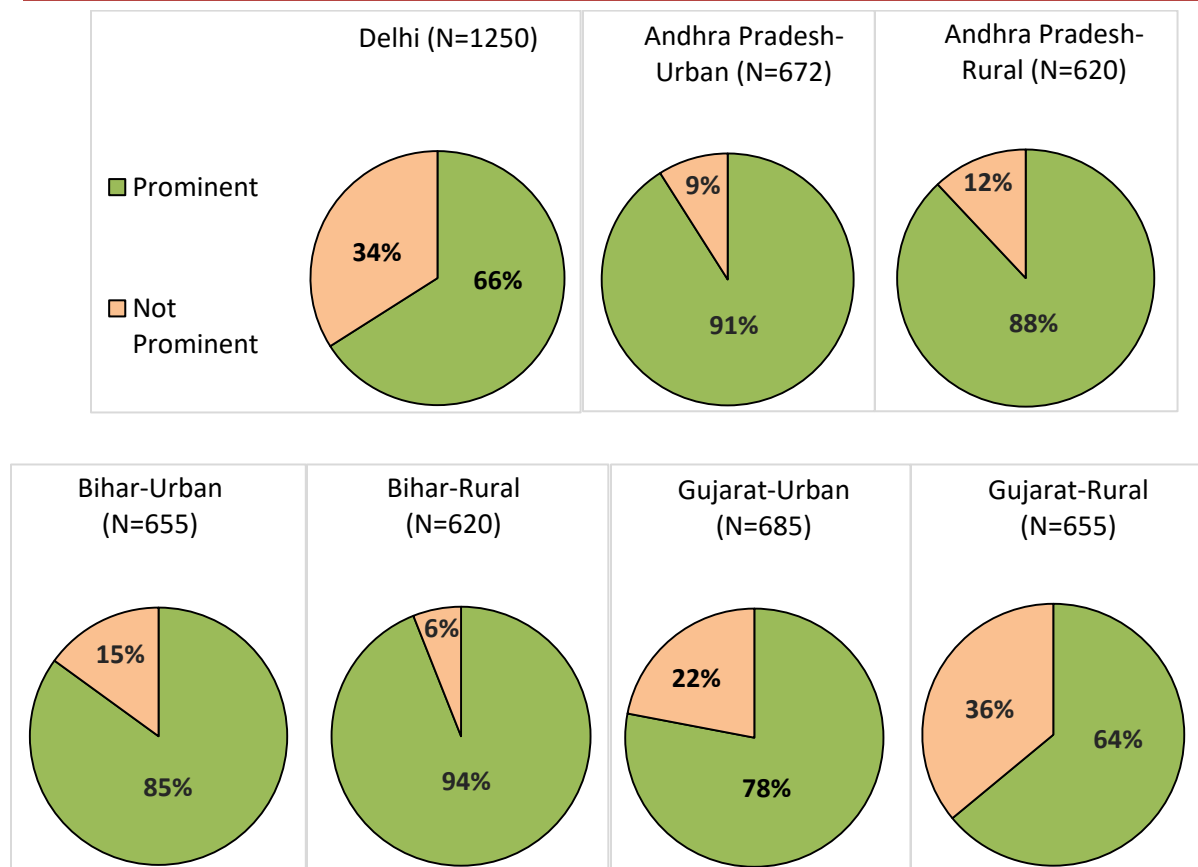
Nearly 80% of respondents reported that information disclosure by TSPs is prominent whereas the rest 20% felt that important information had not been disclosed prominently. 78% of prepaid respondents and 84% of postpaid respondents felt that information disclosure is prominent. 78% of respondents in urban areas and 82% in rural areas felt that information disclosure is prominent as depicted in Figure 4.3. It is possible that TSPs' information disclosure through SMS is largely ignored by consumers who may think that they are spam or fraud messages, and therefore important communication gets lost.

**Figure 4.3: Percentage of Respondents That Felt That Information Disclosure by TSPs is Prominent (Overall)**



There were disparities in consumers' perception of information disclosure not only between LSAs but also within the same LSA. 94% of respondents in rural Bihar felt that information disclosure is prominent whereas it was 85% in urban Bihar. Around 90% of respondents in Andhra Pradesh felt so. In Gujarat, while 78% of urban respondents felt that information disclosure is prominent only 64% of rural respondents felt so. 66% of respondents in Delhi felt that information disclosure is prominent. These figures are represented in Figure 4.4.

**Figure 4.4: Percentage of Respondents That Felt That Information Disclosure by TSPs is Prominent (LSA)**



LSAs with a higher awareness of TRAI’s information disclosure mandate were the least to feel that information disclosure by TSPs is prominent whereas LSAs with a lower awareness of the mandate were the most to feel that information disclosure is prominent. It could be that awareness of the mandate and what it entails leads consumers to scrutinize whether TSPs are adhering to it, and be more alert to instances where information is not disclosed prominently.

#### 4.1.C Types of Information Not Disclosed Prominently

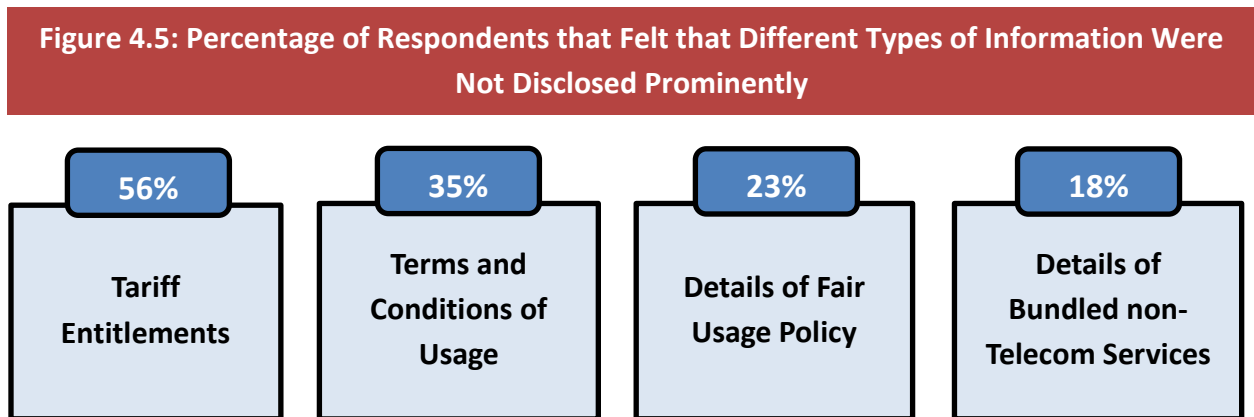
Some of the major aspects of information that need to be disclosed to consumers are tariff details, terms and conditions of usage, details of Fair Usage Policy, and details regarding bundled non-telecom services.

Tariff details, apart from containing tariff rates, should also display details of other charges that can be levied, details of the promised service parameters, information regarding validity period and date of bill payment and so on. Terms and conditions related to the applicable tariff should contain all conditions

related to service provisioning, their limitations and restrictions. Fair Usage Policy (FUP) is a policy utilized by broadband, ISP and mobile internet service providers, the intention of which is to limit the usage of one user over another at peak times in order to ensure uninterrupted internet service availability to all users. FUP contains data usage limit with higher speed, speed of connection up to data usage limit, and speed of connection beyond data usage limit.

**Overall:**

When asked *'What does the lack of information relate to?'*, over half of the respondents who felt that **information disclosure is not prominent stated that it related to tariff entitlements**. 35% stated that it related to terms and conditions of usage, 23% stated that it related to details of Fair Usage Policy (FUP) or Citizens' Charter, and 18% stated that it related to Bundled Non-Telecom Services. This is depicted in Figure 4.5.



## 4.2 Bill Shock

Bill shock is when consumers receive a sudden and unexpectedly high bill for a telecom subscription causing shock and negative reactions in them. Although bill shocks occur in many scenarios such as credit card bills, energy bills and medical bills, they occur most frequently in telecom markets, especially in mobile services.

Bill shocks are often the consequence of inadequately communicated information about usage and is therefore a major issue in relation to transparency of information and consumer interest. For example, mobile bill shocks can happen when a consumer is roaming without understanding the roaming charges involved, or with the overuse of mobile data without a suitable data plan.

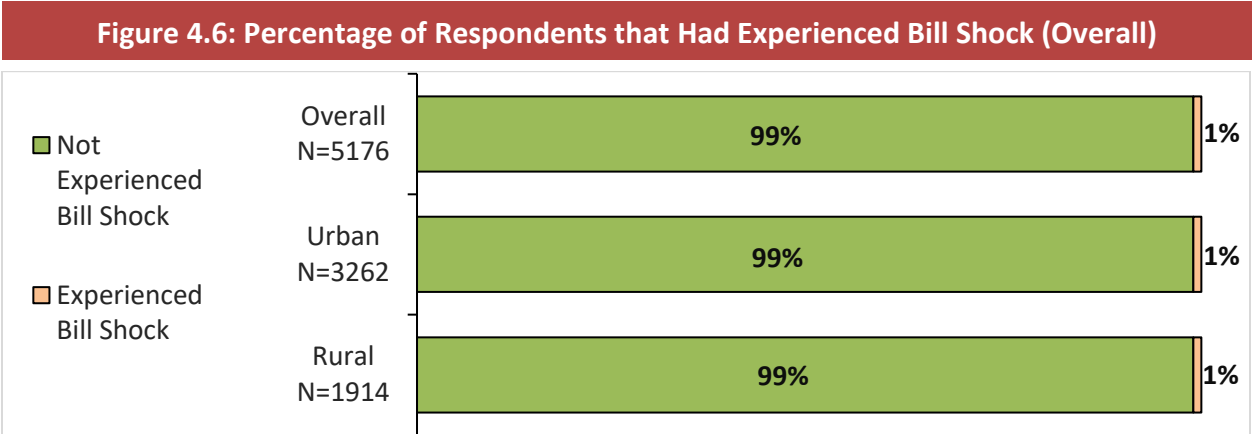
### 4.2.A Consumers’ Experiences with Bill Shock

**Overall, Prepaid-Postpaid, Residential Area and LSA:**

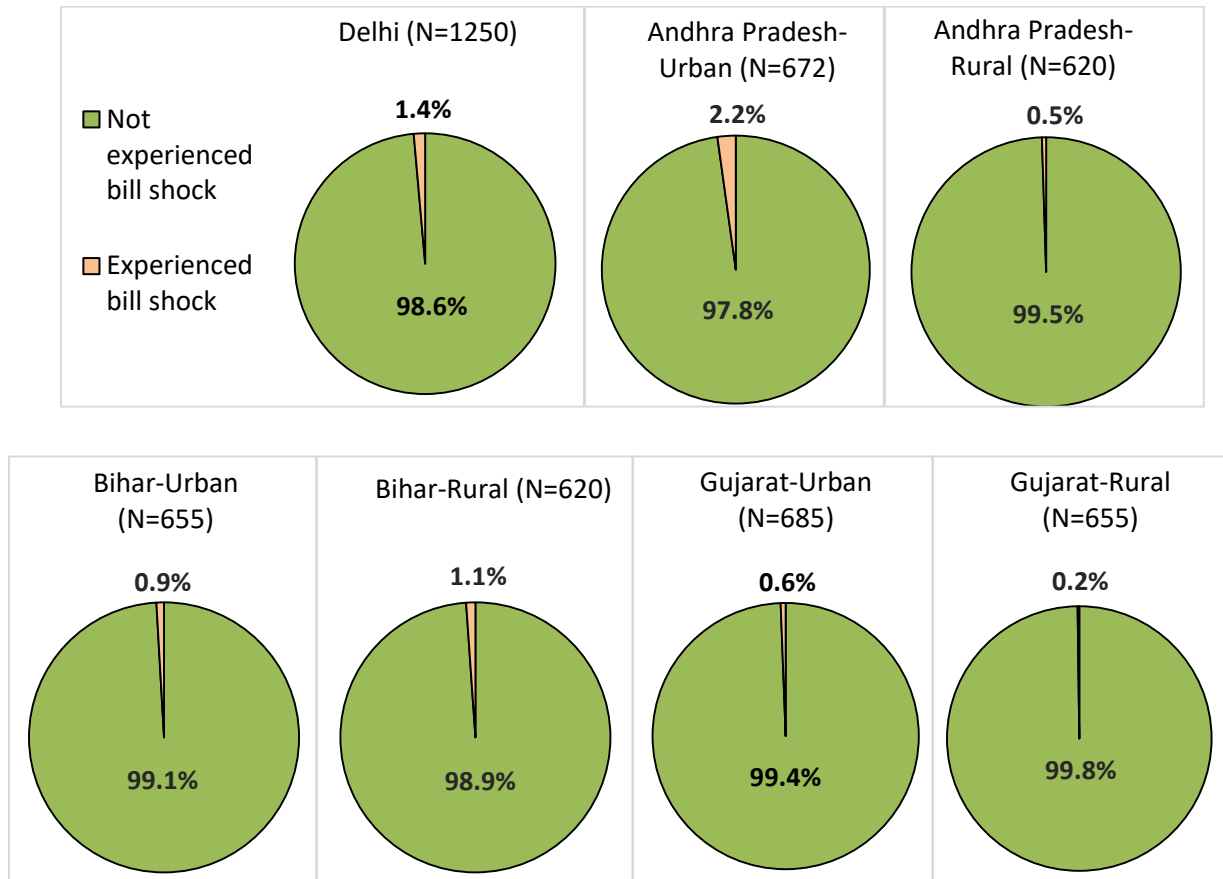
To assess the prevalence of bill shock, all the respondents were asked, *‘Have you ever been a victim of bill shock i.e., have you ever come across a situation when some charges have been levied on your account without your knowledge/consent?’*.

**1% of the respondents reported to have experienced bill shock, both in urban and rural areas,** as depicted in Figure 4.6. Postpaid subscribers (2.9%) reported a higher percentage of bill shock incidents than prepaid subscribers (0.8%). Although the proportion of consumers having experienced bill shock to those that have not is low, when seen in absolute numbers, it can be said that a large number of consumers have experienced bill shock. If we extrapolate the findings to the absolute number of active telecom subscribers in India as of October 2022, which is 1.9 billion, it would mean that on an average, 19 million telecom subscribers have experienced bill shock.

When it comes to LSAs, the highest percentage of bill shock cases occurred in urban Andhra Pradesh at 2.2%, and the lowest in rural Gujarat at 0.2%. This is depicted in Figure 4.7.



**Figure 4.7: Percentage of Respondents that Had Experienced Bill Shock (LSA)**



#### 4.2.B Incidents of Bill Shock

Respondents who had experienced bill shock were further asked, *‘Please specify the details of an incident when some charges (e.g. bill shocks) were levied on your account without your knowledge /consent.’* Many respondents who reported having experienced bill shock did not remember when it had occurred. Among those who did remember, a majority of them said that they had experienced bill shock very recently, between 2022 and 2019 whereas a few of them said that they had experienced it before 2019. Table 4.1 depicts the frequency of bill shock occurrence. It is possible that respondents may have reported instances that were recent and fresh in their memory although they may have experienced bill shock before as well. **Therefore, it cannot be conclusively said that bill shock incidents have increased in recent years.**

When it comes to the nature of incidents, there were a few instances of bill shock in case of prepaid recharges wherein respondents purchased top up vouchers of different values but the amount was deducted without usage. Instances of not using data yet exhausting data plans were also mentioned.

Many cases of bill shock were instances where subscriptions to Value Added Services and OTT services were activated without respondents' consent.

In cases of postpaid subscriptions, respondents stated that they received higher bills without having subscribed to any new service or changing the plan. Subscribers of Wireline Telephony who had experienced bill shock reported that their services were not active but were still receiving bills.

**Many respondents stated that they reported instances of bill shock to customer care but their complaints were not redressed adequately.** In some cases, respondents unsubscribed to the TSPs with whom they experienced bill shock and ported their numbers. Although the proportion of bill shock incidents was less, respondents shared similar experiences indicating that these were not one-off cases but were repeatedly occurring.

**Table 4.1: Frequency of Bill Shock Incidents**

Year	Incidents
2019-2022	22
2015-2018	3
2011-2014	3

### **4.3 Mobile Number Portability**

MNP is an option that allows consumers to move to another service provider without changing their numbers. According to TRAI, "MNP is a facility that allows a telecom service user to move from one operator to another operator irrespective of geographical area (e.g. Delhi to Mumbai)." MNP allows consumers that are dissatisfied with their current TSP to port to another one of their choice subject to certain eligibility criteria.

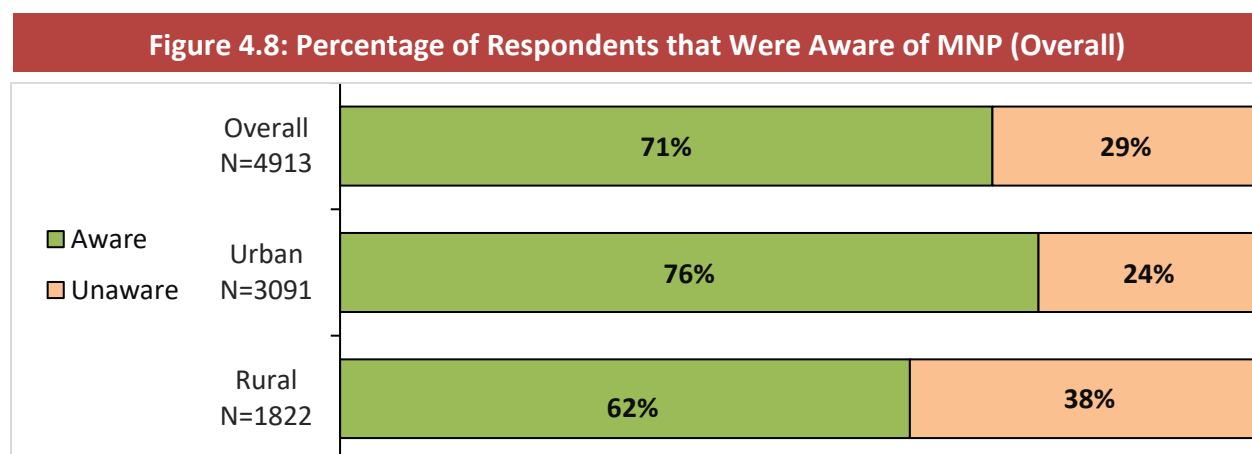
MNP was launched in 2011. It is a measure to ensure consumer welfare by compelling TSPs to provide better quality services to consumers and allows the latter the option to port their numbers in case of

dissatisfaction. It also promotes fair competition in the market as it gives TSPs the opportunity to increase their market share by luring dissatisfied consumers away from their current TSPs.

### 4.3.A Consumers' Awareness of MNP

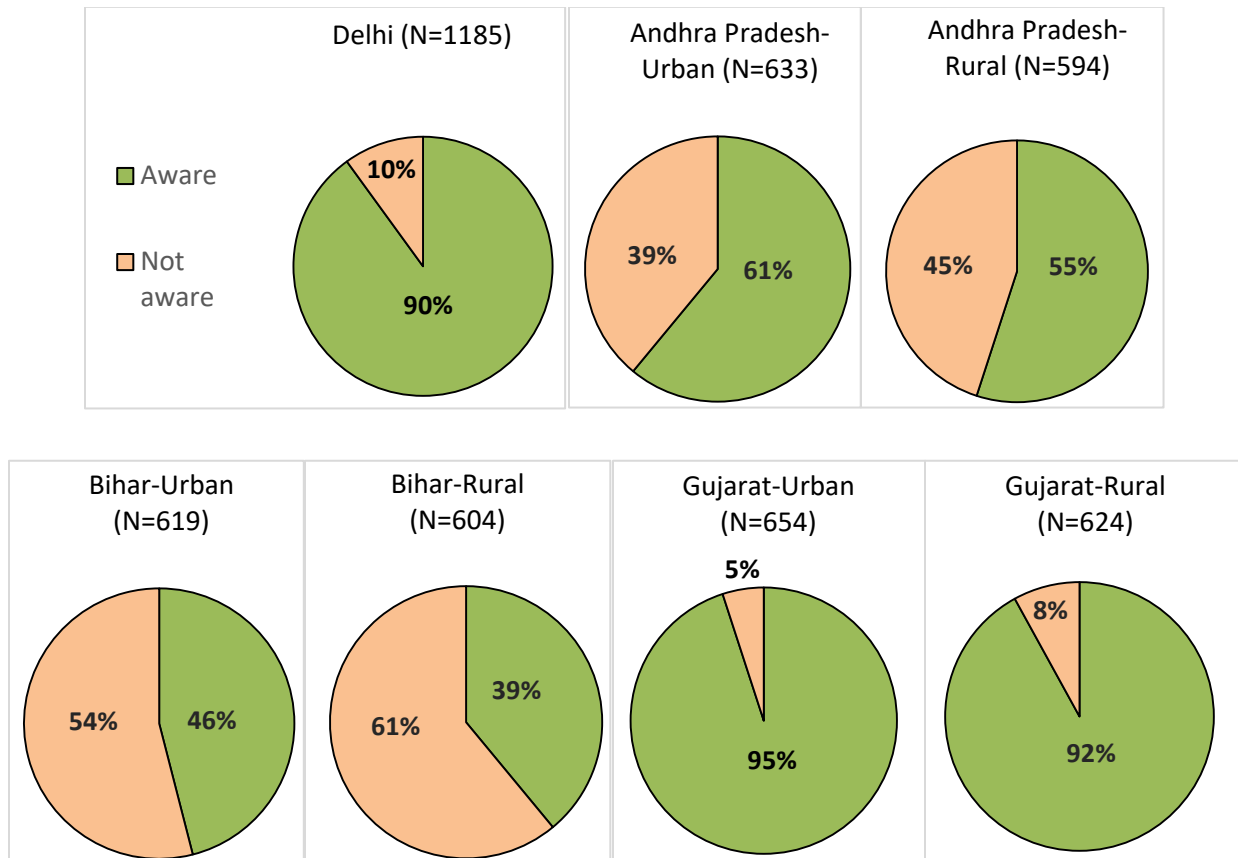
#### Overall, Prepaid-Postpaid, Residential Area and LSA:

Respondents who were wireless subscribers were asked, *'Are you aware that you can port/transfer to the Service Provider (Mobile Number Portability - MNP) of your choice without changing your number?'* 71% of respondents were aware. There was a considerable difference in awareness levels between urban and rural areas. 71% of prepaid subscribers were aware of MNP whereas 68% of postpaid subscribers were aware. 76% of respondents were aware in urban areas compared to 62% of respondents in rural areas. This is depicted in Figure 4.8.



Over 90% of respondents in Gujarat were aware, the highest among all LSAs. Gujarat was followed by Delhi. In Andhra Pradesh, nearly 60% were aware whereas it was lowest in Bihar at less than 50%. The same is depicted in Figure 4.9.

**Figure 4.9: Percentage of Respondents that Were Aware of MNP (LSA)**



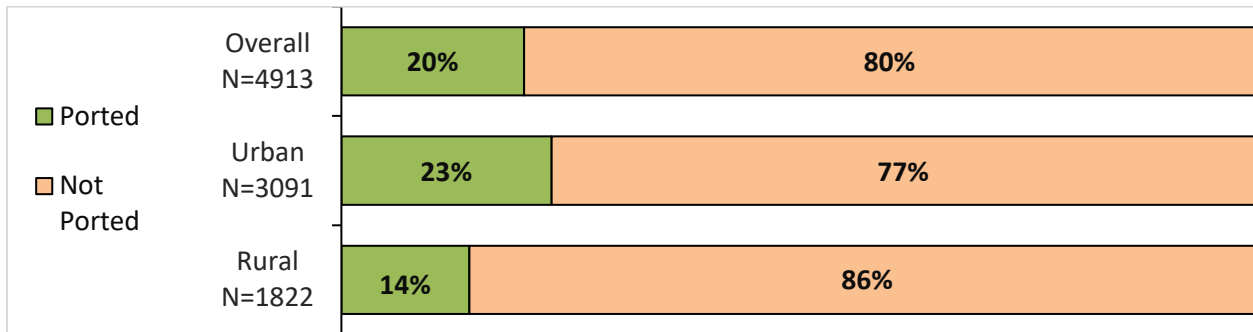
### 4.3.B Consumers' Utilization of MNP

#### Overall, Prepaid-Postpaid, Residential Area and LSA:

Respondents who were wireless subscribers were asked, *'Have you ever ported/transferred (MNP) your number to some other operator?'* **Less than a quarter of them had ported their numbers.** 20% of prepaid subscribers and 13% of postpaid subscribers had ported their numbers. Like the previous indicator, the percentage was higher in urban areas than in rural areas. 23% of respondents in urban areas had ported their numbers whereas 14% in rural areas had done so. This is represented in Figure 4.10.

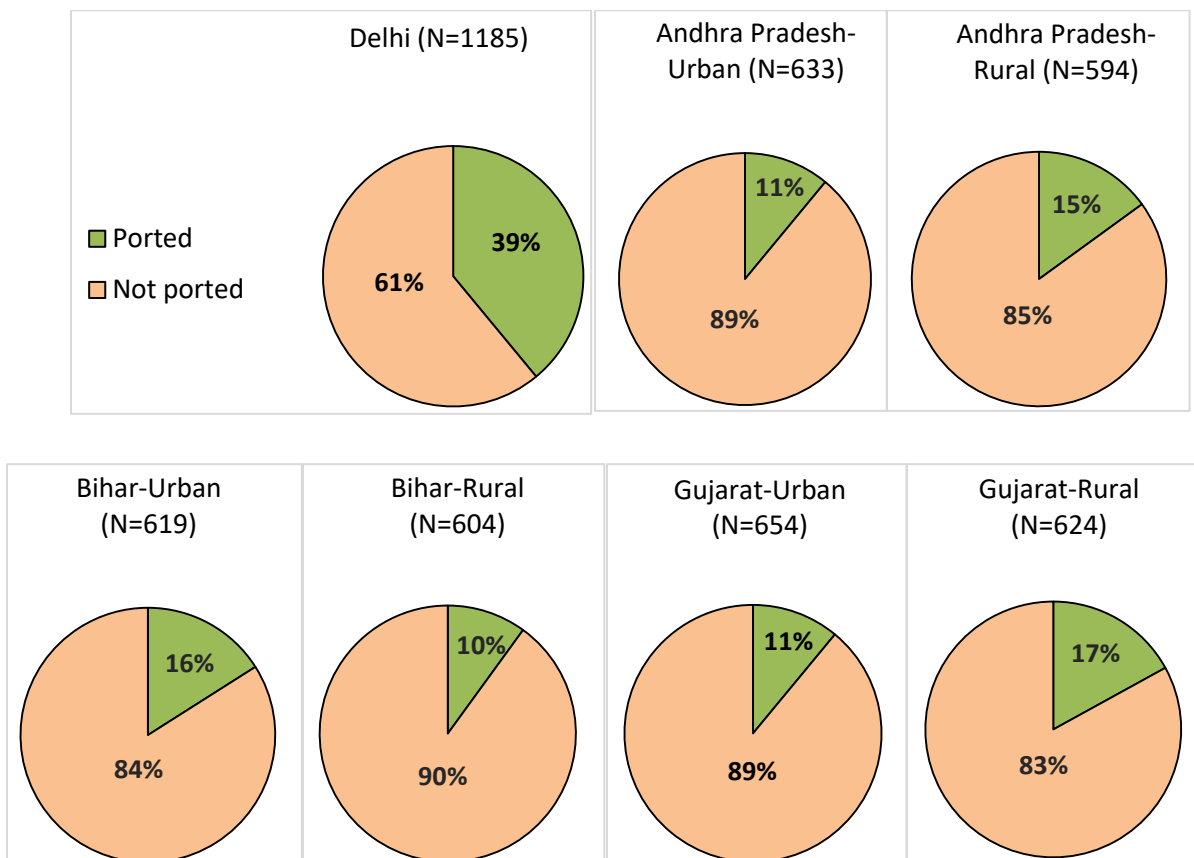


**Figure 4.10: Percentage of Respondents that Had Ported Their Numbers (Overall)**



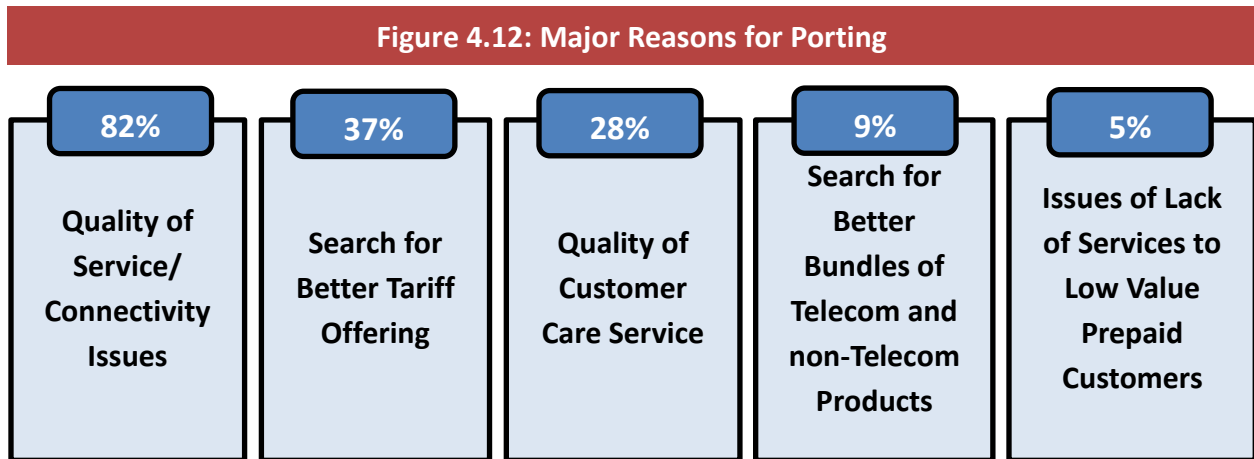
The percentage of respondents in Delhi that had ported their numbers was highest at 39%. The trends across other LSAs were similar with less than 20% of them having ported their numbers as seen in Figure 4.11.

**Figure 4.11: Percentage of Respondents that Had Ported Their Numbers (LSA)**



### 4.3.C Major Reasons for Porting

Respondents who had ported their numbers were further asked, *'What was the reason for porting/transferring out from the current Service Provider?'* Most respondents stated that it was due to **quality of service and connectivity issues**. This was followed by respondents who were in search of a better tariff offering. Quality of customer care was the third most important reason. A better bundle of telecom and non-telecom products and lack of services to low value prepaid subscribers were reasons for a small proportion of respondents. This is represented in Figure 4.12.



## 4.4 Validity of Vouchers

### 4.4.A Consumers' Awareness of TRAI's Mandate to Service Providers to Provide At Least One Voucher with 30-day Validity

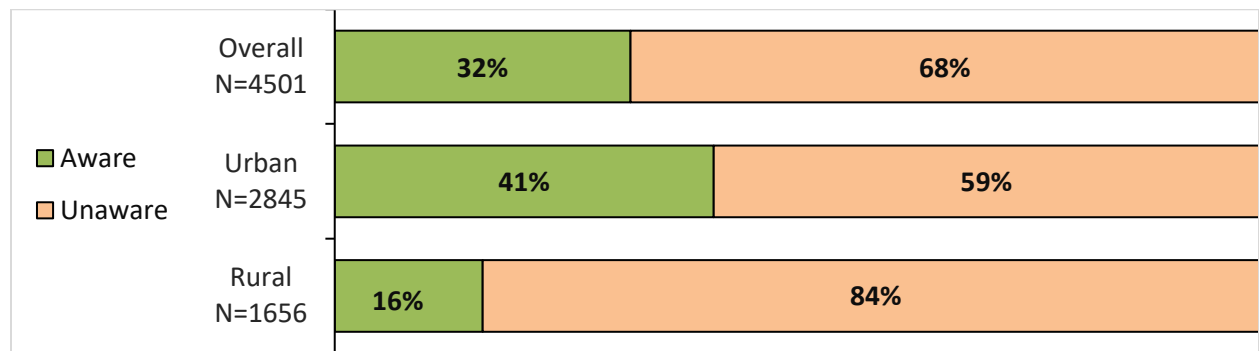
In January 2022, the TRAI amended the Telecommunication Tariff Order 1999 by adding two sub-clauses to clause 6. One of these clauses ordered that every TSP providing prepaid wireless services should offer at least one plan voucher, one special tariff voucher, and one combo voucher with a 30-day validity period. This measure was taken after hearing consumers' concerns regarding the offering of tariff plans with only 28-days validity and not a month.

In contrast to postpaid plans, for which the billing cycle is on a monthly basis, consumers had complained that the offering of popular prepaid plans for 28-days caused confusion and practical hardships because they had to recharge 13 times a year. Although TSPs were transparently disclosing the validity period of the plan, the TRAI felt the need to resolve the issue from the consumer perspective.

**Overall, Residential Area and LSA:**

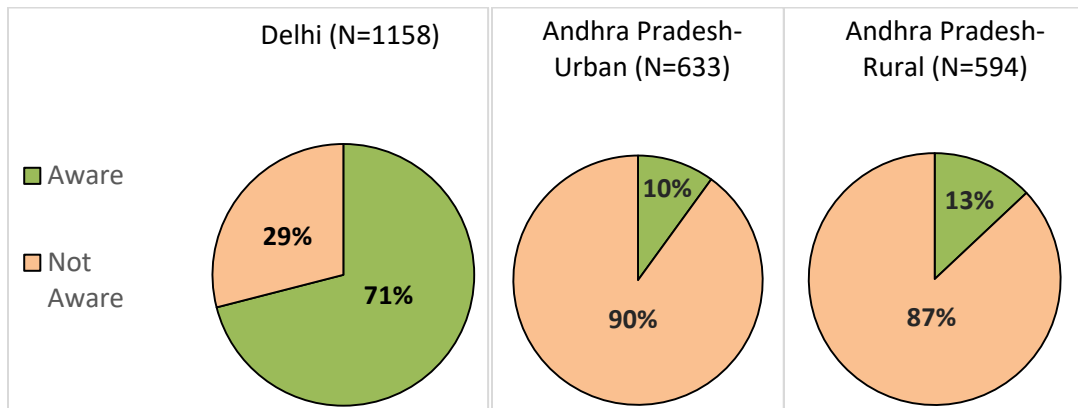
In order to measure the awareness levels of this mandate, respondents were asked, *'Are you aware that the Service Providers are mandated to provide at least one plan voucher, one special tariff voucher and one combo voucher having validity of 30 days?'* This question was asked only to wireless prepaid subscribers. **One-third of the respondents were aware. 41% of urban respondents were aware, significantly higher than the 16% of respondents that were aware in rural areas.** This is depicted in Figure 4.13.

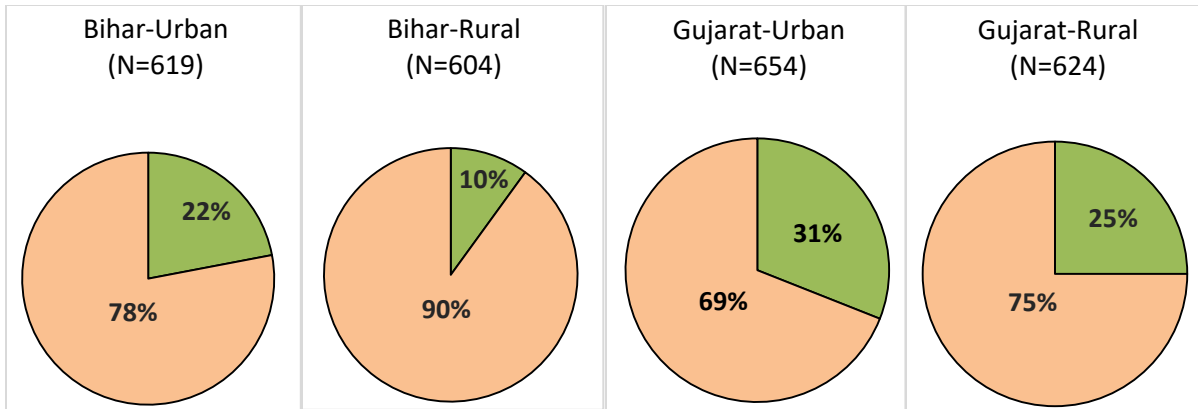
**Figure 4.13: Percentage of Respondents Aware of TSPs Being Mandated to Provide At Least One Voucher with 30-Day Validity (Overall)**



The disparity in awareness varied greatly between LSAs. 71% of respondents in Delhi were aware, the highest among all LSAs. Delhi was followed by Gujarat wherein 31% in rural areas and 25% in urban areas were aware. Less than a quarter of the respondents in Bihar and Andhra Pradesh were aware of the mandate. This is depicted in Figure 4.14.

**Figure 4.14: Percentage of Respondents Aware of TSPs Being Mandated to Provide At Least One Voucher with 30-Day Validity (LSA)**





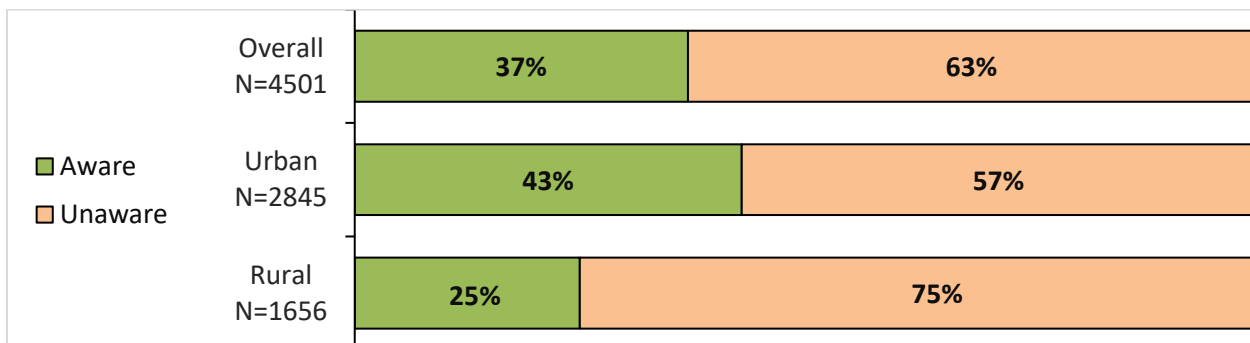
#### 4.4.B Consumers' Awareness of TRAI's Mandate to Service Providers to Provide At Least One Voucher Rechargeable on the Same Day of Every Month

Consumers may have to recharge 13 times a year even with vouchers having a 30-day validity period since some months have 31 days. In order to resolve this issue, the second sub-clause of clause 6 ordered that along with mandatorily offering vouchers with a 30-day validity period, TSPs should also offer at least one voucher that is rechargeable on the same day of every month. This was modelled on the postpaid billing model and a few international practices whereby prepaid vouchers with 'monthly' validity become renewable for tariff on the same date of every month.

##### Overall, Residential Area and LSA:

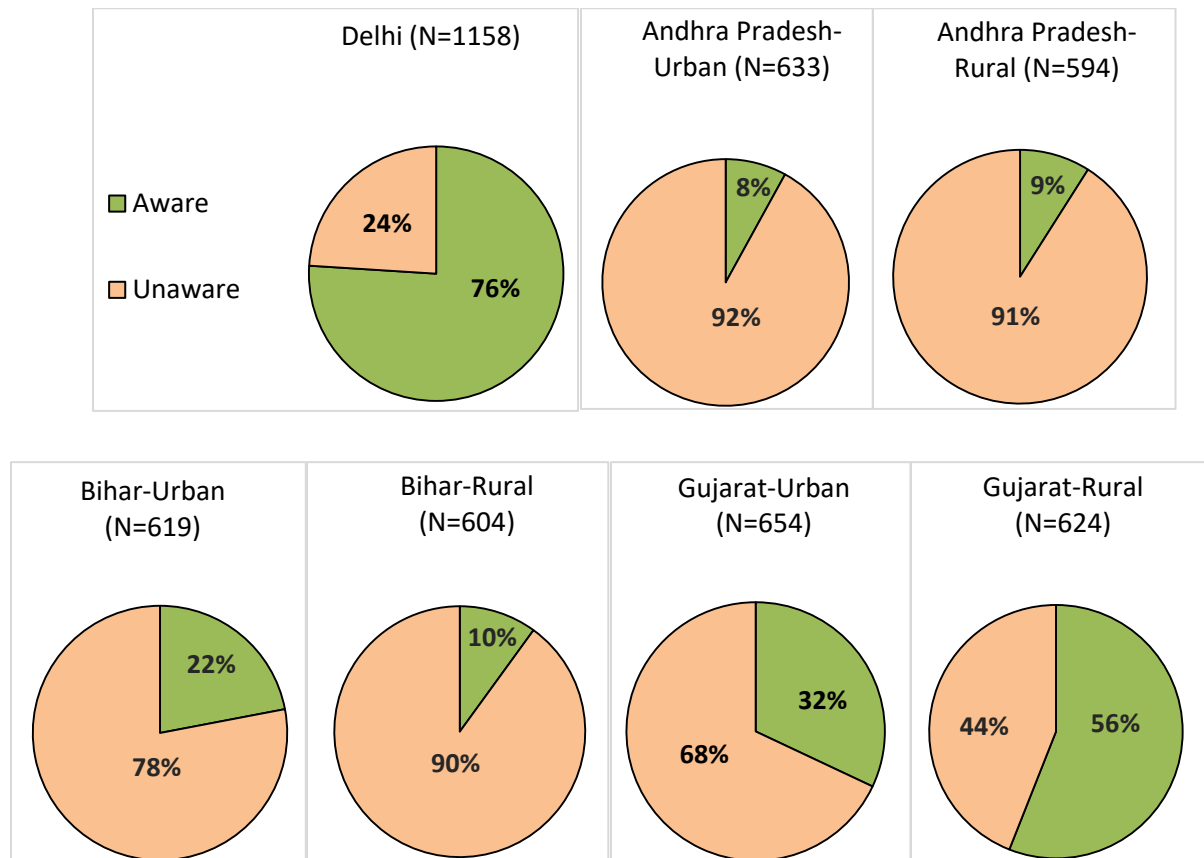
Respondents were asked, *'Are you aware that the Service Providers are mandated to provide at least one plan voucher, one special tariff voucher and one combo voucher rechargeable on same date of every month?'* This question was asked only to wireless prepaid subscribers. **37% of respondents were aware, with 43% in urban and 25% in rural areas** as shown in Figure 4.15.

**Figure 4.15: Percentage of Respondents Aware of TSPs Being Mandated to Provide At Least One Voucher Rechargeable on the Same Day of Every Month (Overall)**



Delhi showed the highest level of awareness once again at 76%, whereas Andhra Pradesh showed the lowest level of awareness at 8% and 9% in urban and rural areas respectively. Over half the respondents were aware in rural Gujarat and nearly one-third in urban Gujarat. Awareness levels in Bihar was the same as the previous indicator, with 22% in urban areas and 10% in rural areas. This is depicted in Figure 4.16.

**Figure 4.16: Percentage of Respondents Aware of TSPs Being Mandated to Provide At Least One Voucher Rechargeable on the Same Day of Every Month (LSA)**



## *Consumer Awareness About Consumer Protection Measures – Summary*

- **While 34% consumers were not aware of TRAI’s mandate to TSPs to disclose all tariff related information prominently, 79% felt that information disclosure by the TSPs was prominent.** Among consumers who felt that information disclosure was not prominent, most felt that the lack of information related to tariff entitlements.
- **71% of the consumers were aware of Mobile Number Portability (MNP) but less than a quarter of them (20%) had ported their numbers.** These were mostly urban consumers. Quality of service and connectivity issues was a major reason for porting.
- **1% consumers had experienced bill shock.** Instances of bill shock included amount deduction after activating top-up voucher without usage in case of pre-paid subscriptions, and plan change in case of post-paid subscriptions. More detailed investigation into cases of bill shock is called for to understand reasons for its occurrence despite laws prohibiting it.
- **32% of respondents were aware that TSPs are mandated to provide at least one voucher with 30-day validity, and 37% were aware that TSPs are mandated to provide at least one voucher rechargeable on the same day of every month.**
- Given that consumer awareness of TRAI’s consumer protection measures is low, a more intensive outreach campaign to increase awareness, particularly through the use of social media, can be carried out.

# 5

## Consumers' Views on Other Related Issues

### 5.1 Important Factors in Choosing Service Providers

Understanding the factors influencing consumer choice in the selection of TSP offers useful insights into consumer behaviour in a particular market environment. It not only helps gauge consumer demands but also helps TSPs deliberate on what to offer in order to best meet these demands in order to retain and grow the consumer base and therefore keep the market competitive.

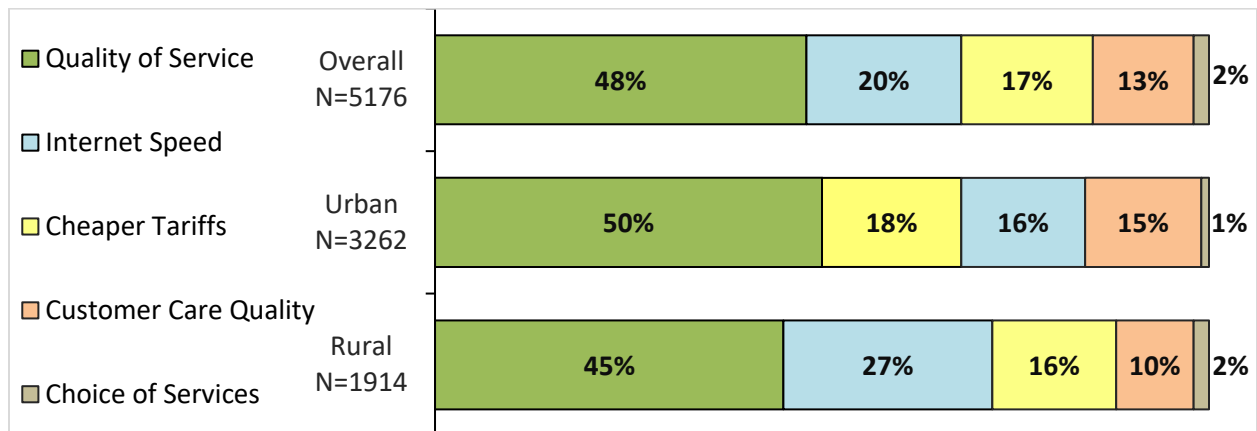
#### Overall, Prepaid-Postpaid, Residential Area and LSA:

All the respondents were asked, '**What is the most important factor for choosing a service provider (TSPs/ISPs)?**'. The findings are represented in Figure 5.1. For almost half the respondents, **Quality of Service was the most important factor**. For 20% of respondents, it was *Internet Speed*, the second most important factor. This was followed by *Cheaper Tariffs* and *Quality of Customer Care* at 17% and 13% respectively. 2% of respondents stated that the *Choice of Bundled Services* was most important.

*Quality of Service or Connectivity* is a more important factor than the *Price of Tariff*. This could be because tariffs are already competitively priced, leading consumers to look for TSPs that provide more value for money with good connectivity and network coverage. *Internet speed* being the second most important factor is indicative of the high usage of internet services by telecom consumers. *Customer care* is the most important factor for a sizable portion of consumers suggesting the significance of the quality of customer support services provided by TSPs.

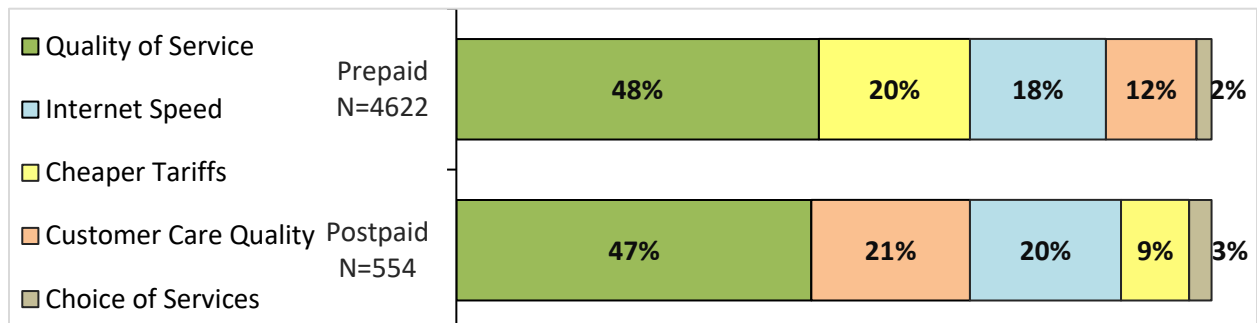
The trends between urban and rural areas were similar except for *internet speed* and *cheaper tariffs*. While *internet speed* was the second most important factor in urban areas, it was *cheaper tariffs* in rural areas.

**Figure 5.1: Important Factors in Choosing Service Providers (Overall)**



*Quality of service* was the most important factor for both prepaid and postpaid subscribers. While *cheaper tariff* was the second most important factor for prepaid subscribers, it was the fourth most important factor for postpaid subscribers. *Customer Care* was the second most important factor for postpaid subscribers. This is depicted in Figure 5.2.

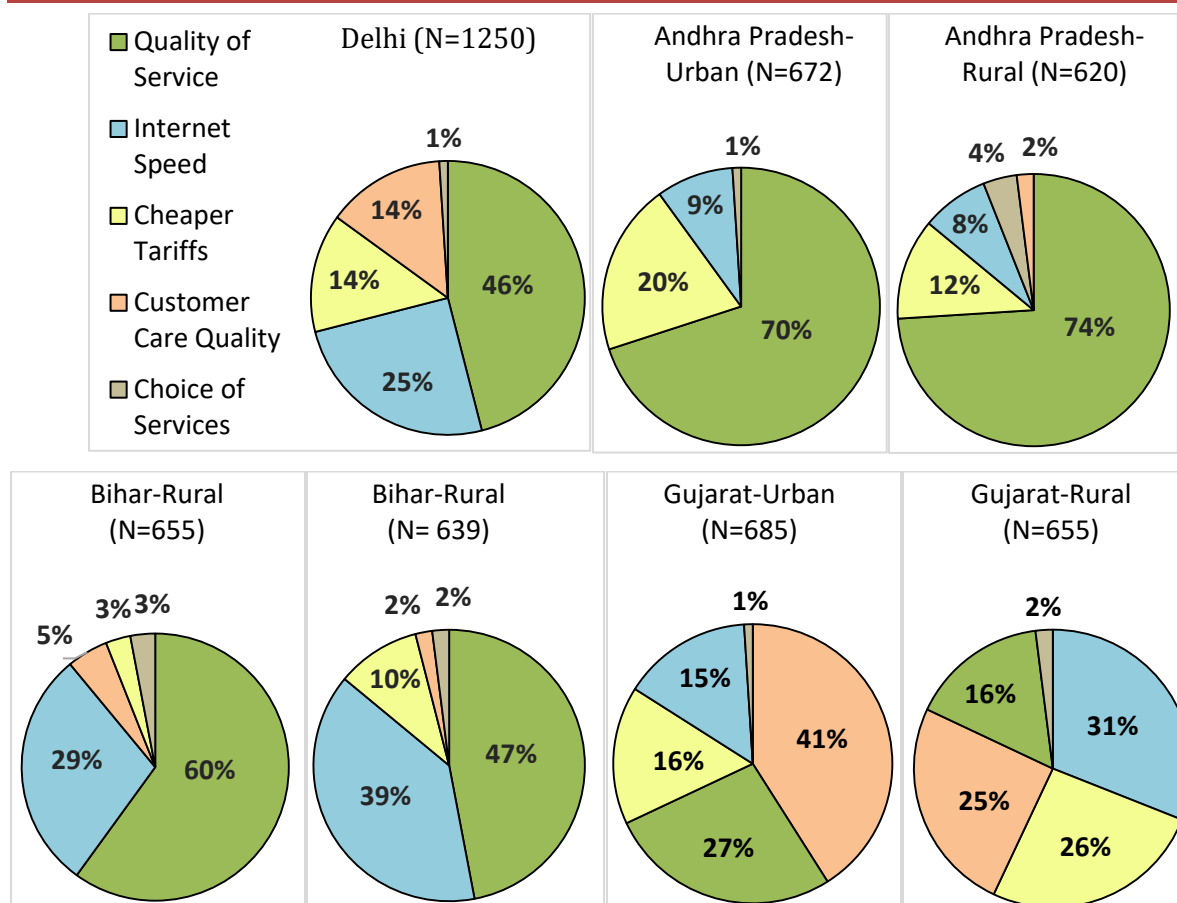
**Figure 5.2: Important Factors in Choosing Service Providers (Prepaid-Postpaid)**



The trends across LSAs varied widely showing the different priorities of consumers from different locations. *Quality of service* was the most important factor in Delhi, Bihar and Andhra Pradesh. It was so for almost three-fourths of respondents in Andhra Pradesh. The *quality of customer care* was the most important for a majority in urban Gujarat whereas it was *internet speed* for a majority in rural Gujarat. While *internet speed* was the second-most important factor in Delhi and Bihar, it was *cheaper tariffs* in Andhra Pradesh and rural Gujarat. Figure 5.3.



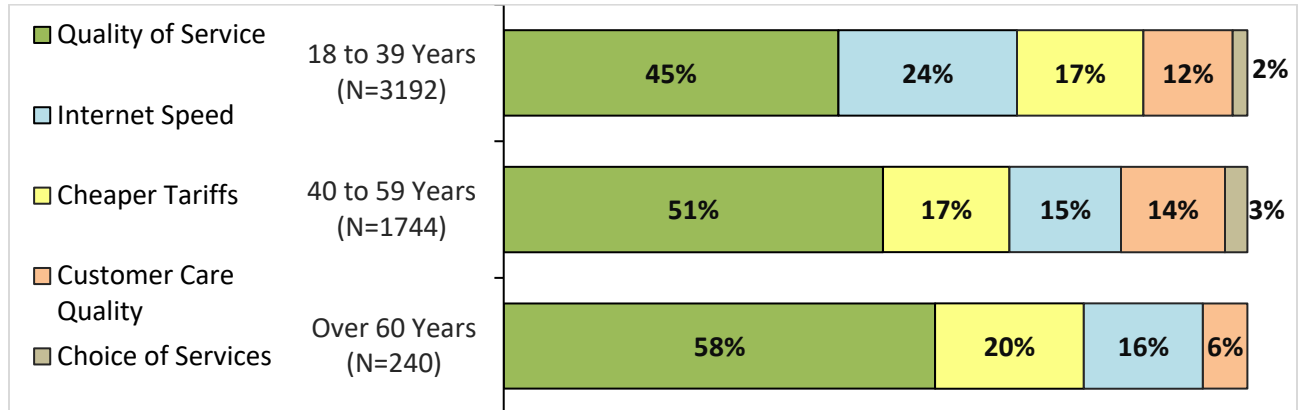
**Figure 5.3: Important Factors in Choosing Service Providers (LSA)**



**Age Category:**

*Quality of service* remained the most important factor in choosing service providers to respondents of all age categories. It was important to 45% of respondents in the 18 to 39 years group, 51% of respondents in the 40 to 59 years group, and 58% of respondents over 60 years. *Internet speed* was the second most important factor to the younger age group of 18-39 years whereas it was among the least important factors for the older age groups. *Cheaper tariff* was the second most important to the older age groups. This is represented in Figure 5.4.

**Figure 5.4: Important Factors in Choosing Service Providers (Age)**



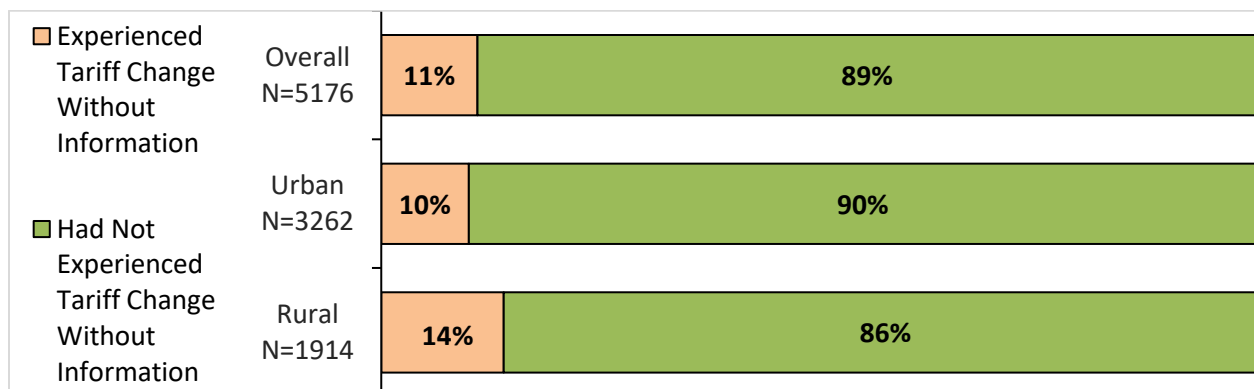
## 5.2 Consumer Experiences with Tariff Change Without Prior Information

As mentioned earlier, the telecom sector in India has moved from tariff rate fixation by the TRAI to a policy of forbearance whereby the TSP has the flexibility to fix tariffs for different services subject to regulations. Protecting consumers against tariff hikes or tariff discontinuance without their prior information is a key aspect of ensuring transparency. The TRAI has in place two mandates in this regard.

### Overall, Prepaid-Postpaid, Residential Area and LSA:

In order to understand what proportion of consumers have faced tariff change by TSPs without their information, respondents were asked, *'Have you ever come across a situation in which your tariff has been changed without your information?'* This question was asked to all the respondents. **11% of respondents had faced this issue.** 12% of prepaid subscribers and 10% of postpaid subscribers had experienced tariff change without prior information. A slightly higher percentage of rural respondents than urban respondents had faced this at 14% and 10% respectively. This is depicted in Figure 5.5.

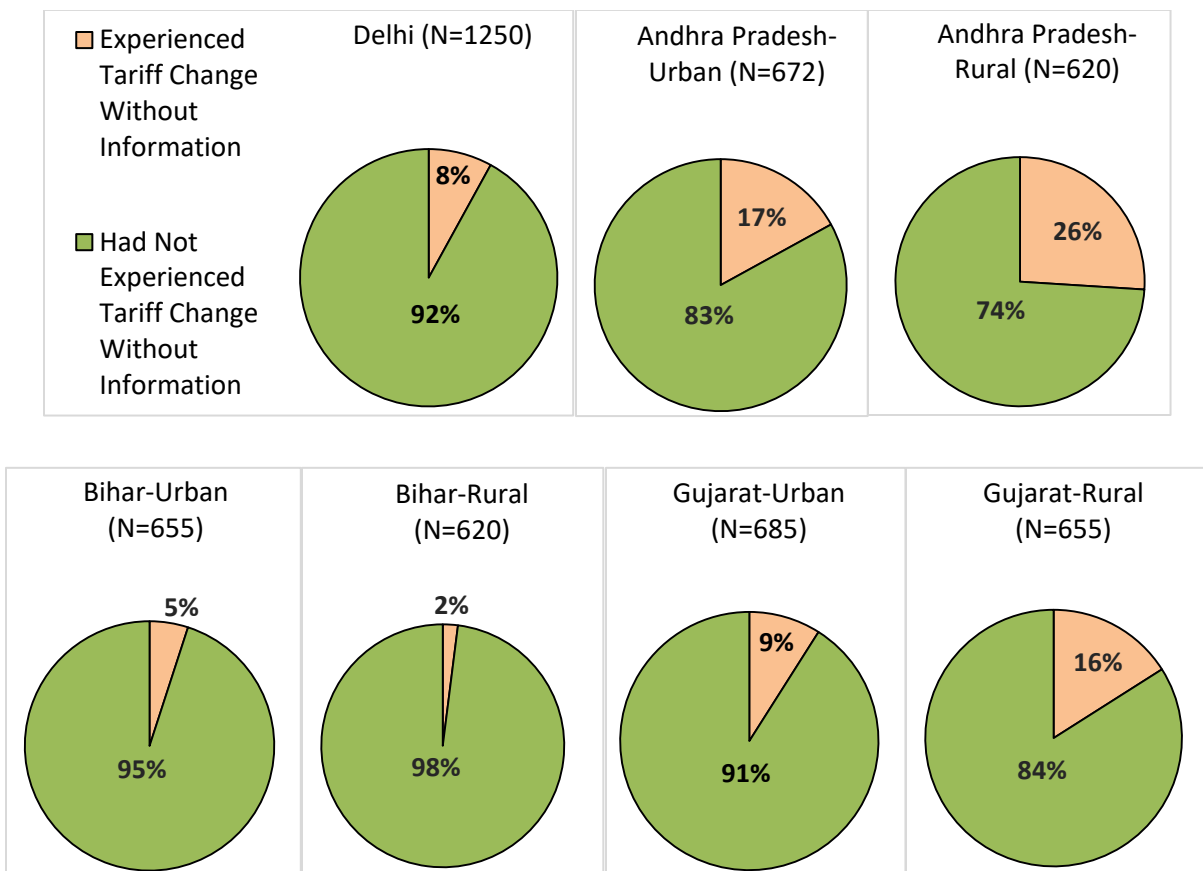
**Figure 5.5: Percentage of Respondents that Had Faced Tariff Change Without Information (Overall)**



As seen in Figure 5.6, respondents in Andhra Pradesh had faced tariff change without information the most, with 17% in urban and 26% in rural areas. Respondents in Bihar were the least to have faced this at 5% in urban and 2% in rural areas.

While these findings inform us about the proportion of consumers who have faced this issue at some point, it does not tell us when these instances occurred. In order to know whether the TRAI’s measures to improve transparency have been effective, it would be insightful to learn whether consumers have experienced tariff change without information in the recent past and continue to do so.

**Figure 5.6: Percentage of Respondents that Had Faced Tariff Change Without Information (LSA)**



### *Consumer' Views on Other Related Issues – Summary*

- **Quality of service (48%) was the most important factor in choosing service providers, followed by internet speed (20%) and cheaper tariff (17%).** For prepaid subscribers, cheaper tariff was the second most important factor whereas it was customer care quality for postpaid subscribers.
- **11% consumers reported that their tariff had been changed without prior information.** However, this could also largely be attributed to consumers not checking their SMSes assuming that they are spam. Newer modes of communicating important information to consumers would therefore have to be considered.

# 6

## Consumers' Awareness of TRAI's Regulatory Provisions for Consumer Protection

### 6.1 Awareness of Regulations Relating to Tariff Change

In the interest of protecting consumers against tariff hikes and frequent tariff changes as previously discussed, through the 43rd Amendment of the TTO, 2006, the TRAI ordered that once a subscriber has enrolled into a plan, that plan must be available to the subscriber for a minimum period of six months (180 days) from the date of enrollment. While the TSP can reduce the tariff of a plan, increasing tariffs is subject to certain conditions.

In the case of lifetime plans or unlimited validity wherein an upfront payment has been made, the plan will continue to be made available to the subscriber for the duration prescribed in the plan, until the date of expiry of the TSPs' current license, the date of which should be informed to the subscriber.

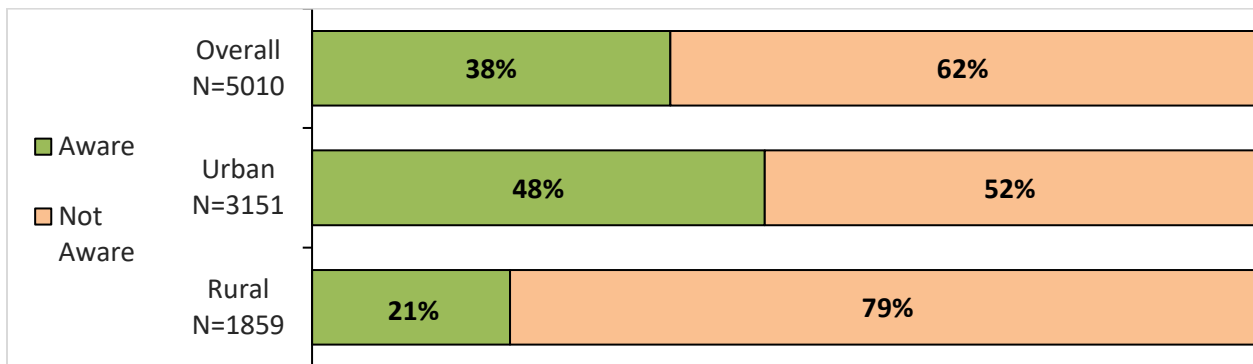
The mandate also provides for the consumers to choose any other tariff plan during the six months validity period, and all requests for such plans are to be accepted by the TSP and implemented from the next billing cycle.

With the introduction of plans with longer validity periods, it became important to protect consumers against tariff hikes and their right to choose another plan at any time, considering that such plans involve upfront payment. This measure was therefore taken to protect consumers and reiterate TSPs' obligation to provide clarity to consumers about the validity of plans, especially in the case of lifetime plans, and not market or advertise plans in a misleading manner.

#### Overall, Residential Area and LSA:

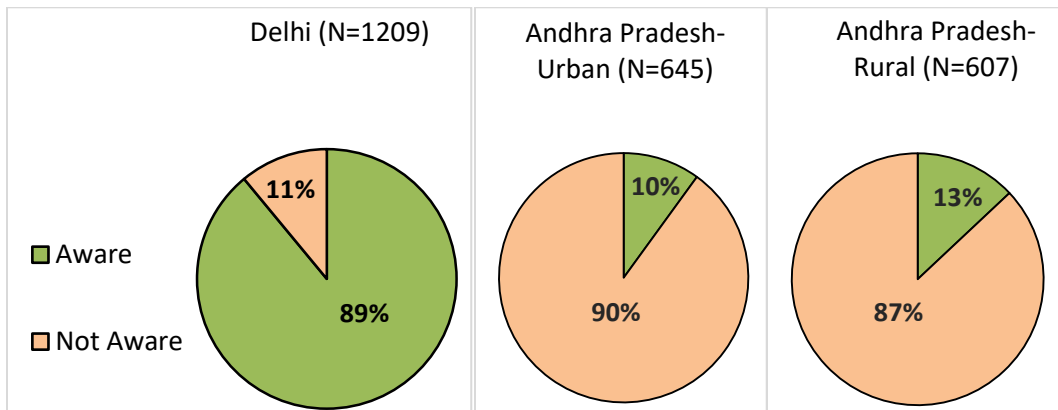
Respondents were asked, '*Are you aware that a Service Provider cannot change the tariff for at least 180 days from the date of enrolment of a subscriber?*' This question was asked only to wireless subscribers. **Over one-third of respondents, i.e., 38% were aware.** Almost half of the respondents were aware in urban areas whereas less than a quarter were aware in rural areas as depicted by Figure 6.1.

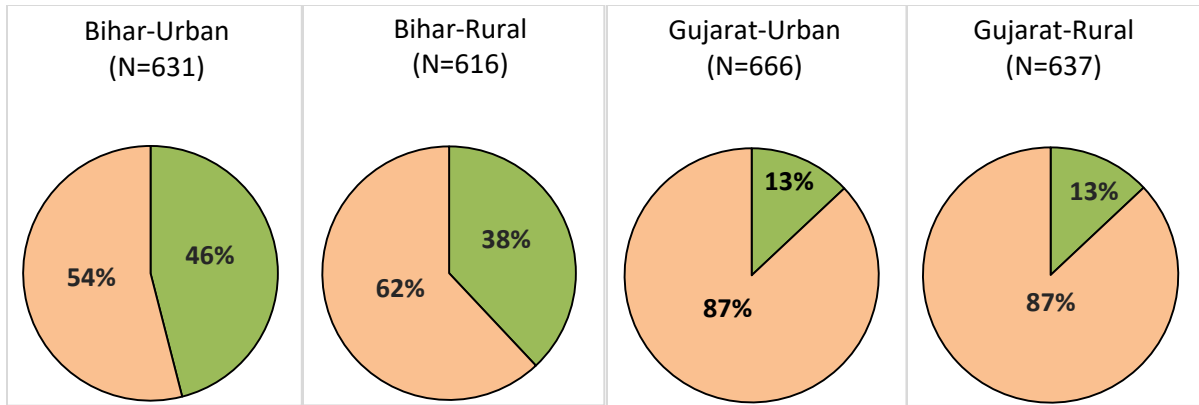
**Figure 6.1: Percentage of Respondents Aware of Regulations Relating to Tariff Change (Overall)**



The disparity in awareness levels between LSAs was wide. Delhi had the highest awareness at 89% whereas Andhra Pradesh had the lowest awareness at 10% and 13% in urban and rural areas respectively. Gujarat was close to Andhra Pradesh at 13% in both urban and rural areas. 46% of respondents in urban, and 38% in rural Bihar were aware. This is depicted by Figure 6.2.

**Figure 6.2: Percentage of Respondents Aware of Regulations Relating to Tariff Change (LSA)**





The findings show that there is still potential to increase awareness of this mandate, especially in non-metro LSAs and rural areas. Awareness of their rights would help consumers scrutinize whether TSPs are indeed adhering to the mandate, and raise issues of lack of transparency.

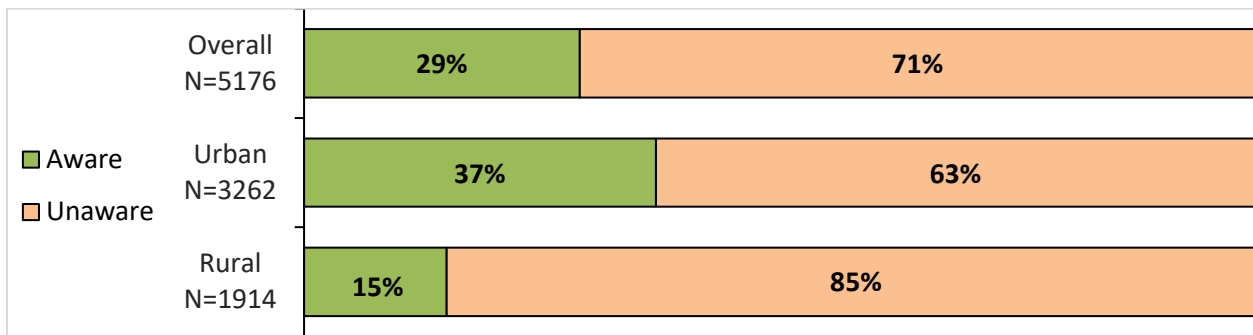
## 6.2 Awareness of Regulations Relating to Discontinuance of Tariff

The fast-evolving nature of the telecommunications sector to accommodate changing demands also results in frequent discontinuance of irrelevant tariffs. After receiving complaints from consumers regarding the abrupt shutting down of services, the TRAI mandated TSPs to give 30-days' advance notice to their subscribers before closing any services. In addition to the notice, the TSP should also state the options available to subscribers, including that of MNP facility.

### Overall, Residential Area and LSA:

In order to understand the level of awareness of this mandate, all the respondents were asked, **'Are you aware that a Service Provider has to give a minimum notice of 30 days before discontinuance of a tariff offer?'** Almost one-third of respondents were aware, with 37% in urban areas and 15% in rural areas as depicted by Figure 6.3. The awareness of this mandate was lower than the one regarding tariff change discussed previously.

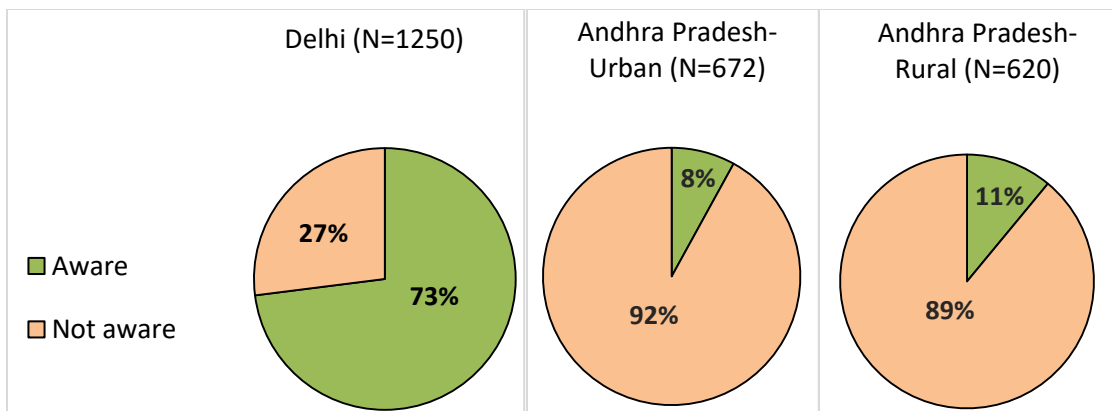
**Figure 6.3: Percentage of Respondents Aware of Regulations Relating to Discontinuance of Tariff (Overall)**



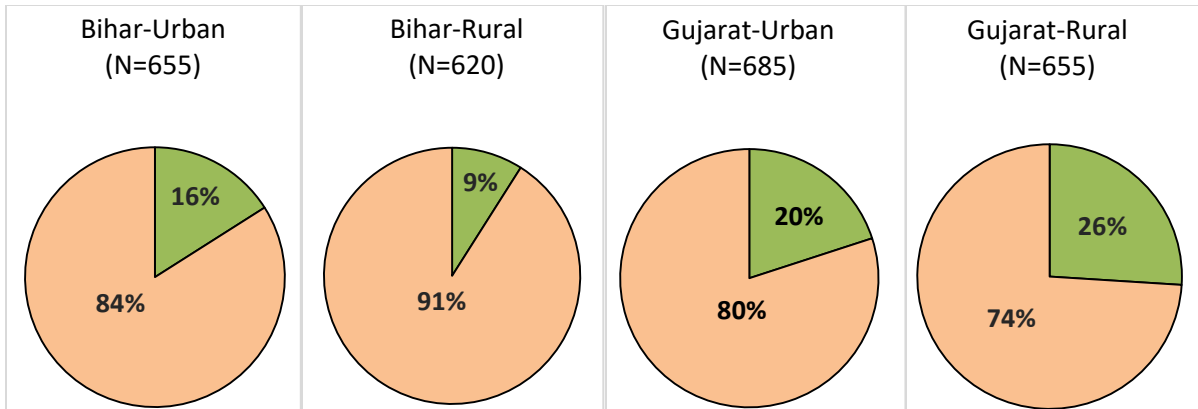
The highest level of awareness was in Delhi at 73% whereas the lowest level was in Andhra Pradesh at 8% in urban areas and 11% in rural areas. This is depicted in Figure 6.4. While the level of awareness regarding this mandate in Gujarat, at 20% in urban and 26% in rural areas, was higher than the previous mandate. In Bihar, 16% were aware in urban areas and 9% in rural areas. This was consistent with the varying trends that the LSAs displayed for almost all indicators which suggests there are region-specific reasons for these that need to be explored.

Like the previous indicator, there is potential to increase the awareness of this mandate as well, and empower consumers with a knowledge of their rights.

**Figure 6.4: Percentage of Respondents Aware of Regulations Relating to Discontinuance of Tariff (LSA)**







### 6.3 Awareness of Different Types of Vouchers

Vouchers are “cards or coupons in printed or electronic form, which are offered, marketed and sold by a service provider to consumers for adding monetary value to the pre-paid account or for altering one or more items of applicable tariff for a pre-defined period or for subscription to a tariff plan.”

In order to provide clarity and transparency in the identification of the multiple and complex tariff plans offered by TSPs, vouchers are streamlined and standardized into four types: Top Up Vouchers, Special Tariff Vouchers, Combo Vouchers and Plan Vouchers.

#### 6.3.A Awareness of Top Up Voucher

“Top Up Voucher means a paper voucher or an electronic voucher providing additional monetary value to the prepaid consumer without any restriction in terms of validity or usage.” Top Up Vouchers add only monetary value to the subscriber's account and do not contain any benefits. Subscribers can use them as per their requirement without any restriction in terms of validity period and usage.

#### Overall, Residential Area and LSA:

Respondents who were prepaid wireless subscribers were asked, ‘Have you ever heard of or do you know what a Top Up Voucher is?’. As depicted in Figure 6.5, half of the respondents had only heard of the voucher and 10% of them were aware of the voucher whereas 40% of them had not heard of it. Awareness levels were higher in urban than rural areas by a large margin. While 31% were unaware in urban areas, 56% were unaware in rural areas.

Awareness of the voucher was highest in Delhi and lowest in Andhra Pradesh. While 13% were unaware in the former, nearly two-thirds were unaware in the latter. Around half the respondents had either heard of or were aware of the voucher in Gujarat. There was wide disparity between urban and rural Bihar with

86% having either heard or being aware in the former and 44% in the latter. This is represented in Figure 6.6.

### 6.3.B Awareness of Special Tariff Voucher

*“Special Tariff Voucher” or “STV” means a paper voucher or electronic voucher, which on activation alters one or more items of applicable tariff in the consumer tariff plan for a period not exceeding ninety days in terms of limited or unlimited usage of voice calls, SMS or data but does not provide any monetary value.”*

A subscriber who wishes to avail the benefits that the service provider offers can purchase a STV for a stipulated time-period. The benefits lapse upon expiry of STV, and the rates of the relevant tariff plan subscribed by the consumer become applicable.

#### Overall, Residential Area and LSA:

Respondents who were prepaid wireless subscribers were asked, *‘Have you ever heard of or do you know what a Special Tariff Voucher (STV) is?’*. Amongst all the vouchers, respondents were least aware of STV. **A majority of respondents, over 53% of them, had not heard of the voucher, whereas 38% of them had heard of it and 9% knew about it.** Awareness was higher in urban than rural areas with 49% of urban respondents not having heard of it as opposed to over two-thirds of rural respondents. This is depicted in Figure 6.5.

Delhi had the highest awareness levels whereas Andhra Pradesh had the lowest once again. Less than a quarter had not heard of STV in Delhi, whereas around half the respondents in Gujarat, and 83% in Andhra Pradesh had not heard of it. In urban Bihar, respondents who had either heard or were of the voucher was double that in rural areas. This is represented in Figure 6.6.

### 6.3.C Awareness of Plan Voucher

*“Plan Voucher or “PV” means a paper voucher or electronic voucher that enrolls a consumer into a tariff plan.”* Plan Vouchers do not add any monetary value to the subscriber's account but simply enroll them into a tariff plan. Plan Vouchers are meant for subscribers who have taken a new connection and want to enroll into a new plan or existing subscribers who wish to change their tariff plan to another.

#### Overall, Residential Area and LSA:

Respondents who were prepaid wireless subscribers were asked, *‘Have you ever heard of or do you know what a Plan Voucher (PV) is?’*. Respondents were most aware of the plan voucher among all vouchers. As seen in Figure 6.5, **47% of them had heard about the voucher, 14% of them knew about it and 39% of them had not heard of it.** Those who had not heard of the voucher in rural areas was double that in urban areas at 58% and 27% respectively.

97% of respondents in Delhi had either heard of or were aware of PV, the highest among all LSAs. Around two-third in Gujarat, and around one-third in Andhra Pradesh had either heard or were aware. While this was 65% in urban Bihar, it was 22% in rural areas. The same is represented in Figure 6.6.

### 6.3.D Awareness of Combo Voucher

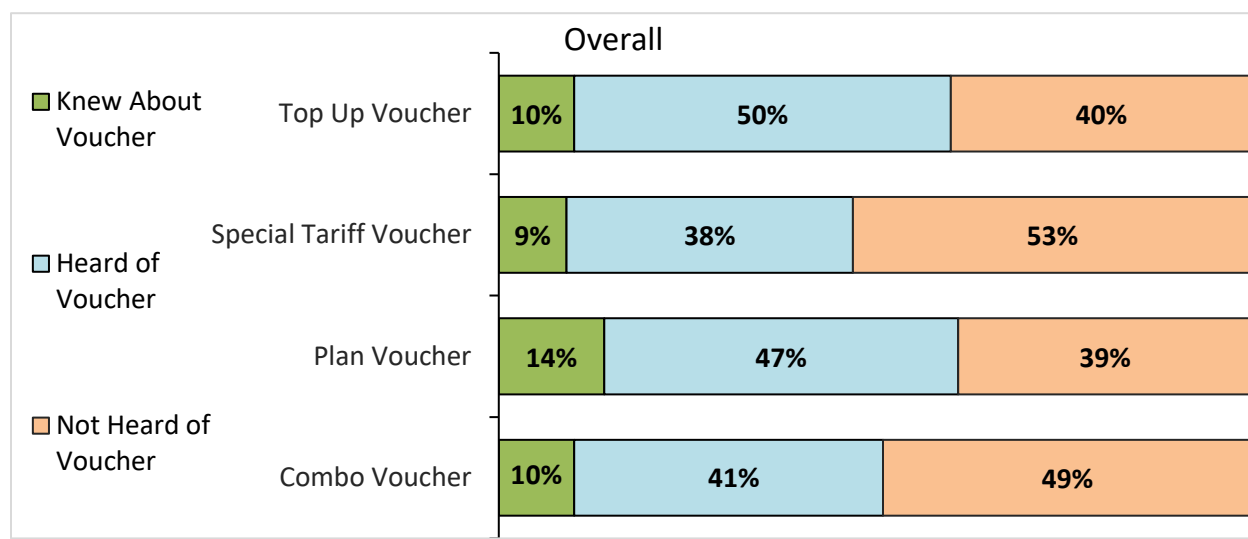
*“Combo Voucher” or “CV” means a paper voucher or electronic voucher which on activation alters one or more items, for a period not exceeding ninety days, in the tariff plan of the consumer and adds monetary value to the prepaid account of the subscriber.”* Combo Vouchers offer more choice to consumers and allow TSPs to create innovative bundles including features of STV and Top Up Vouchers.

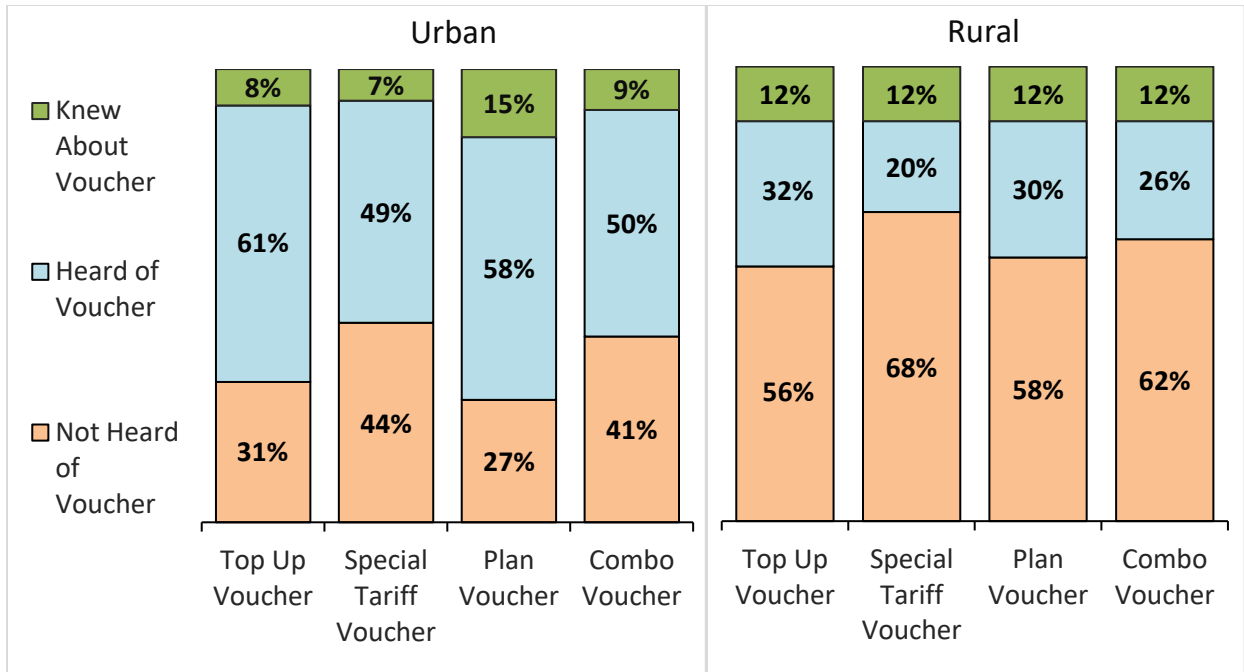
#### Overall, Residential Area and LSA:

Respondents who were prepaid wireless subscribers were asked, ***‘Have you ever heard of or do you know what a Combo Voucher (CV) is?’*** Nearly half of the respondents were not aware of the CV, 41% had heard of it and 10% knew about it. Like the other vouchers, awareness levels were higher in urban than rural areas; 41% had not heard of it in urban areas and 62% had not heard of it in rural areas. This is depicted in Figure 6.5.

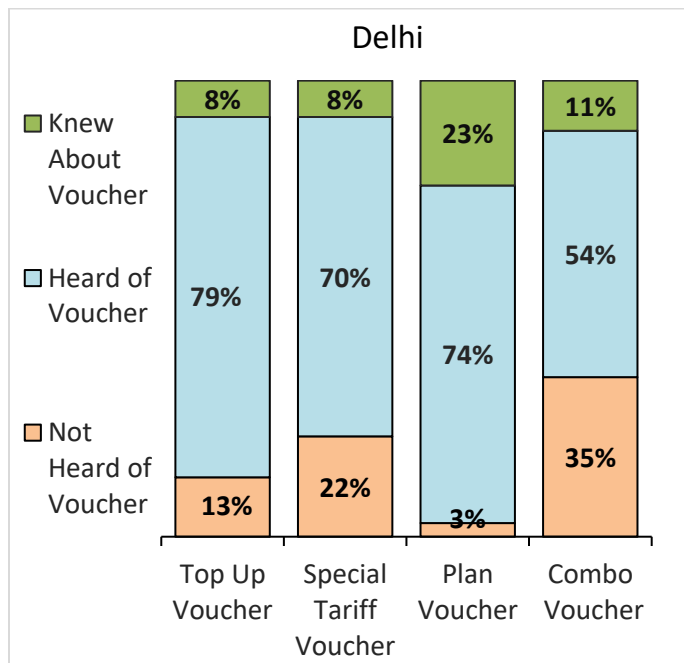
Around two-third in Delhi and Gujarat had either heard of or were aware of the voucher, whereas it was less than quarter in Andhra Pradesh. The disparity between urban and rural Bihar was wide once again with 80% having heard/being aware in the former and only 24% in the latter. The same is represented in Figure 6.6.

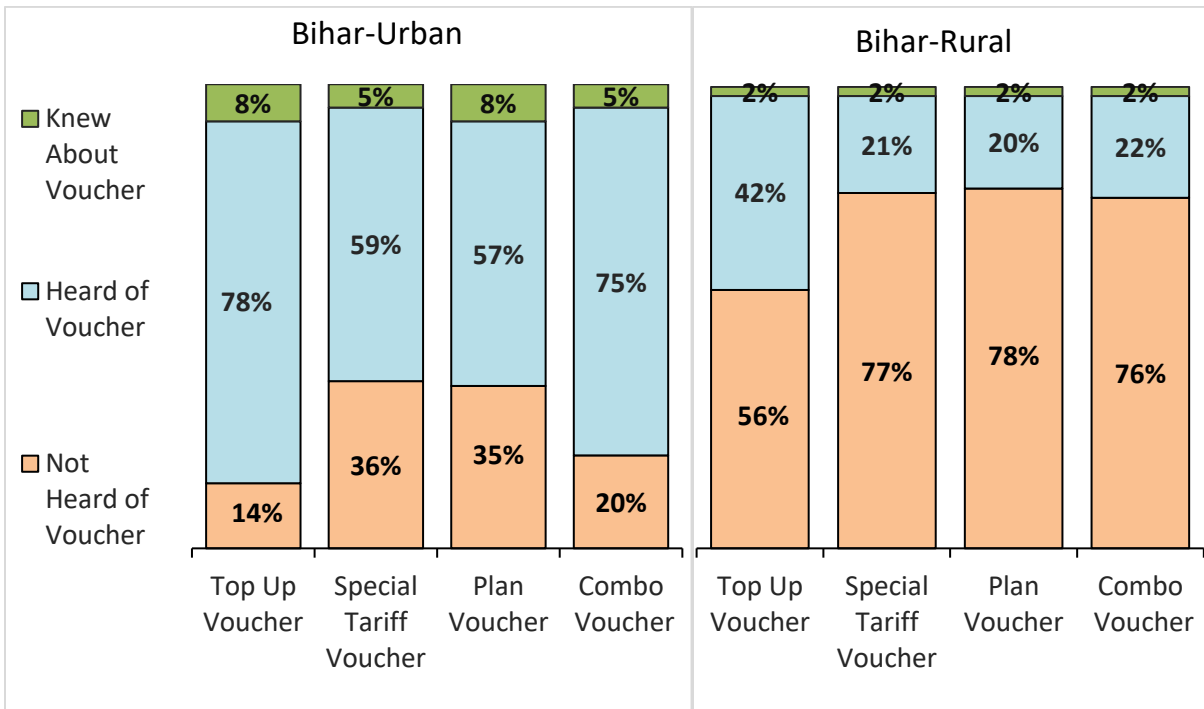
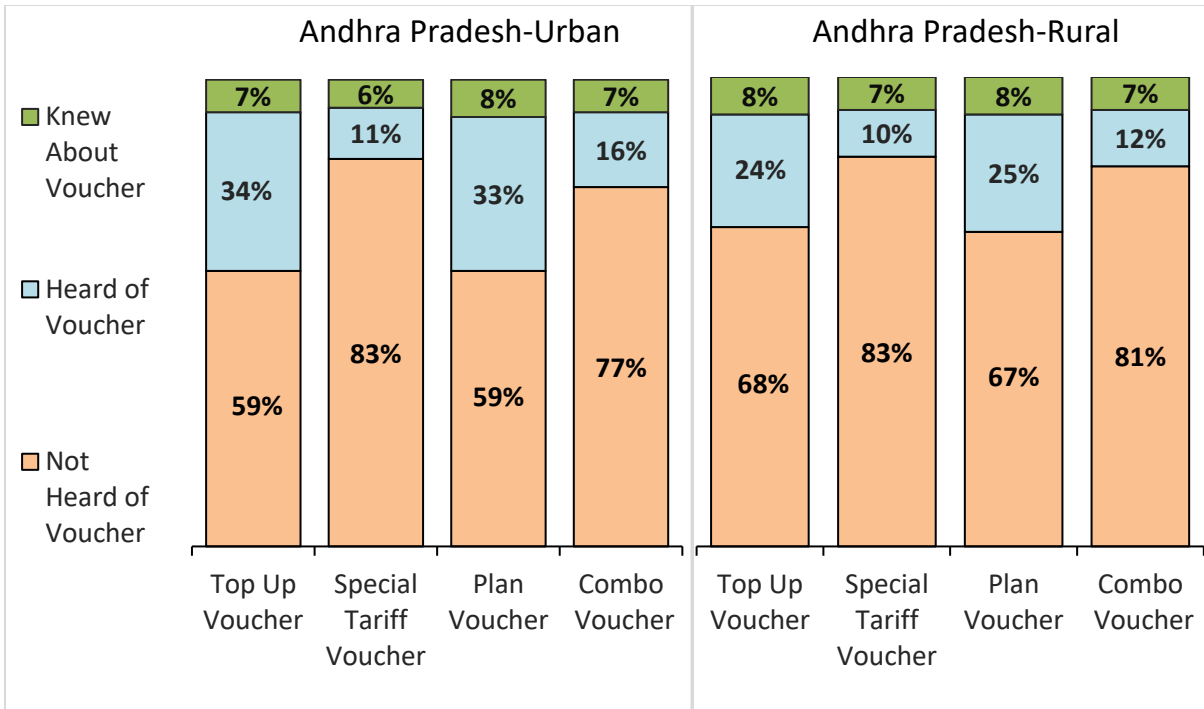
**Figure 6.5: Percentage of Respondents Aware of Top Up, Special Tariff, Plan and Combo Vouchers (Overall)**

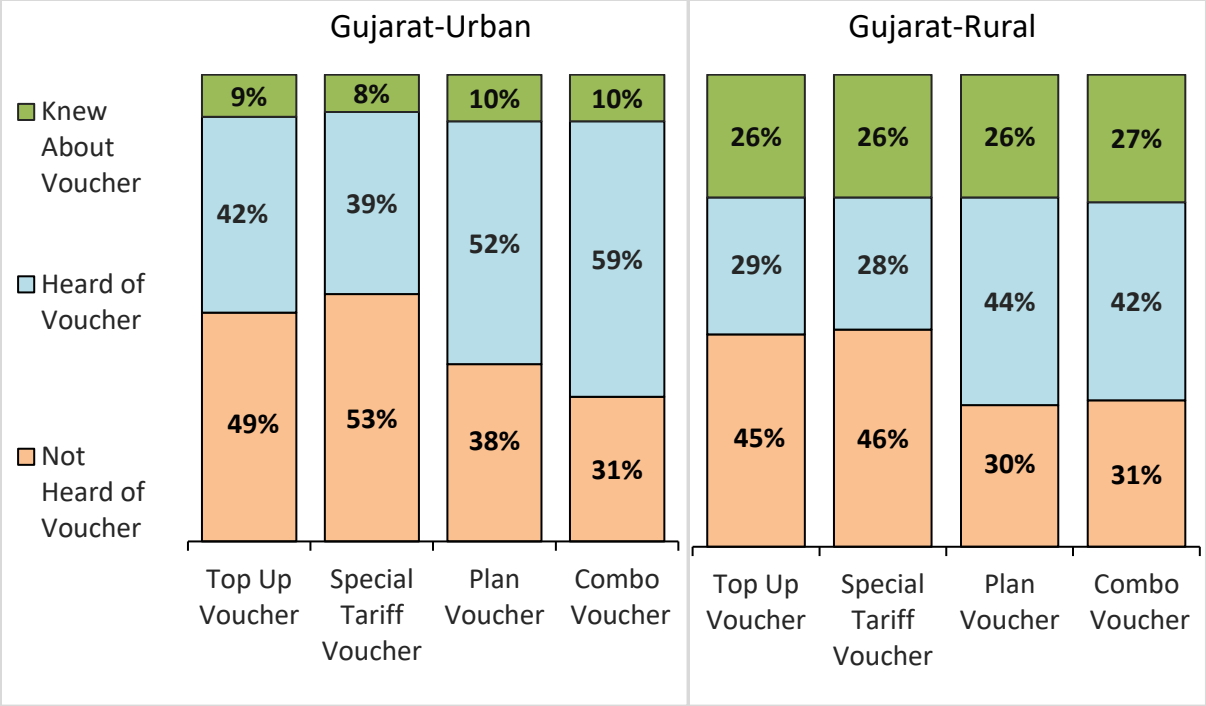




**Figure 6.6: Percentage of Respondents Aware of Top Up, Special Tariff, Plan and Combo Vouchers (LSA)**







### 6.4 Consumers Receiving Notifications Upon Service Usage

Unlike postpaid subscribers, prepaid subscribers do not receive bills with details of their service usage at the end of every billing cycle. Therefore, with the Consumer Protection Regulations of 2012, TSPs were mandated to provide prepaid subscribers with details of their account usage through SMS or USSD following every deduction so that consumers may verify and regulate their usage. Account usage includes details such as last call duration, call charge, validity period, account balance etc, for calls, SMS, data usage and activation of any service such as VAS, which has been specified by the TRAI.

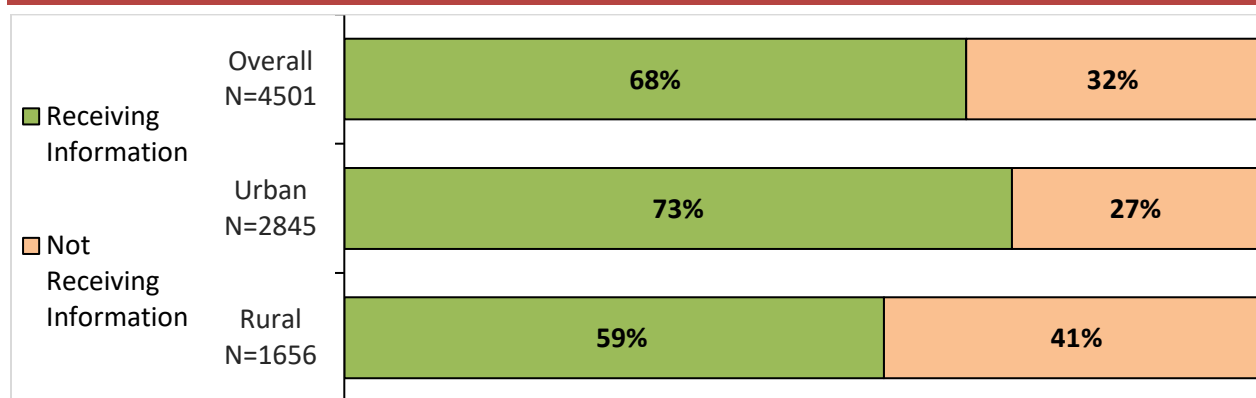
#### Overall, Residential Area and LSA:

In order to understand to what extent TSPs were adhering to this mandate, respondents who were prepaid wireless subscribers were asked, *'Being a prepaid subscriber, are you regularly getting information through SMS or USSD, relating to deductions made on every call/every session of data usage/Value Added Services (VAS)/Activation or Deactivation of data services?'*

Nearly two-thirds of respondents who were prepaid subscribers were regularly receiving notifications/information relating to service usage. As seen in Figure 6.7, 73% of respondents in urban areas were receiving notification, higher than those in rural areas which was at 59%.

79% of respondents that were not receiving regular information were subscribers of unlimited packs. **70% of respondents were not receiving information relating to calls, 3% were not receiving information relating to data, and 27% were not receiving information related to both calls and data.**

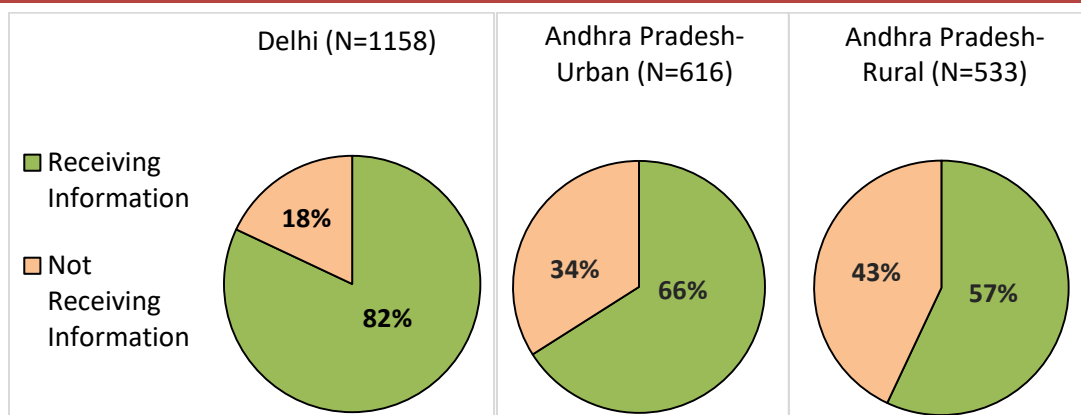
**Figure 6.7: Percentage of Prepaid Wireless Subscribers That Were Receiving Notifications Upon Service Usage (Overall)**

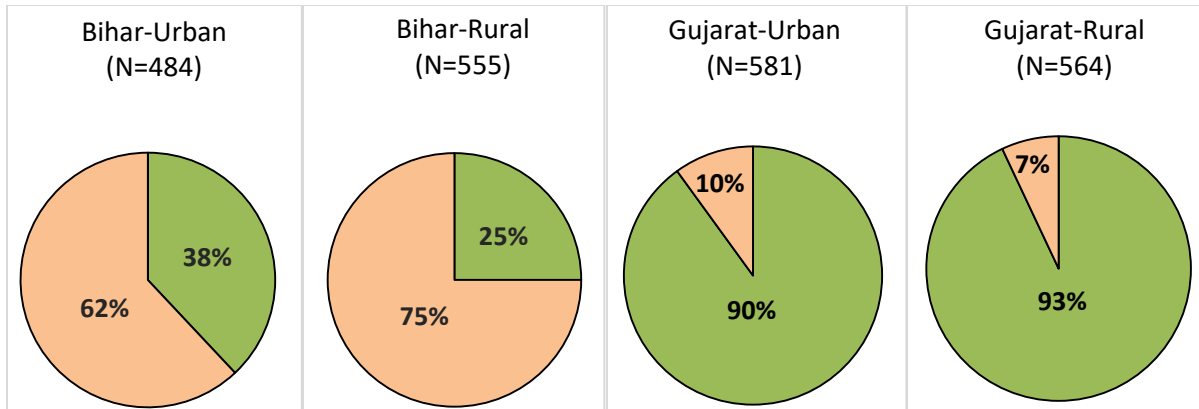


Over 90% of respondents in Gujarat reported receiving regular information, the highest among all LSAs. This was followed by 82% in Delhi, 66% of respondents in urban and 57% in rural Andhra Pradesh. Bihar had the lowest percentage with 38% in urban areas and 25% in rural areas. This is depicted in Figure 6.8.

It can be said that a significant proportion of consumers are not receiving notifications on service usage despite it being mandated. The fact that a majority of these respondents are subscribers of unlimited packs can be a possible reason for this. However, that still leaves some respondents who are not subscribers of unlimited packs and yet not receiving regular information. Possible reasons for this and for the difference between LSAs needs to be further enquired.

**Figure 6.8: Percentage of Prepaid Wireless Subscribers That Were Receiving Notifications Upon Service Usage (LSA)**





## 6.5 Value Added Services

VAS means “Services which are offered to add value to the core services, the core services being voice calls, voice or non-voice messages and facsimile transmission.”

With increased technological innovations, the capabilities and usage of mobile devices has moved beyond voice communication. Parallely, telecom services have also moved beyond offering core services to a spectrum of non-core services such as listening to music, reading news headlines, mobile banking and so on called Value Added Services. These add value to consumers’ subscriptions while bringing in big portions of revenue to the TSPs.

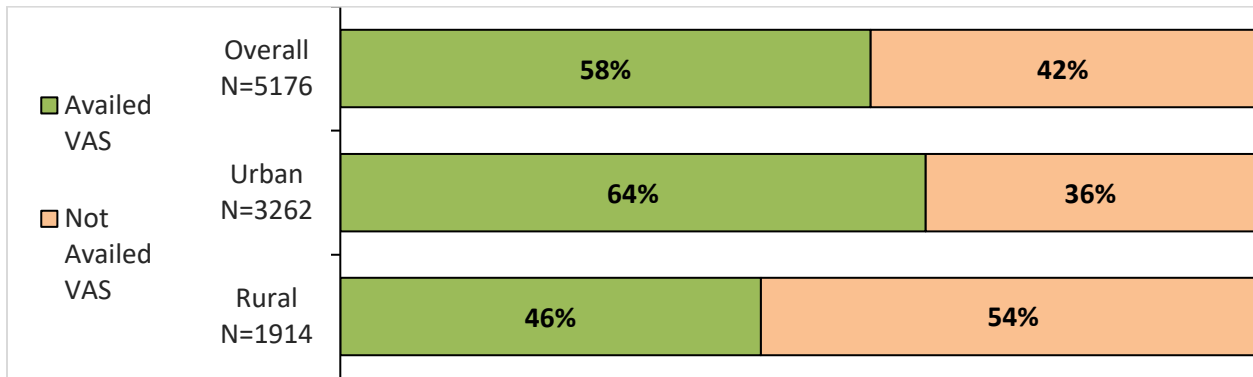
### 6.5.A Consumers that had Availed VAS

#### Overall, Residential Area and LSA:

All the respondents were asked, ‘**Have you ever availed Value Added Services (VAS)?**’ and were given examples such as missed call alert, caller tune, live cricket score, voice mail box, on demand video subscriptions, music subscriptions, online games, online storage etc. As seen in Figure 6.9, **58% of respondents had availed VAS**, with a higher percentage of urban than rural respondents at 64% and 46% respectively.

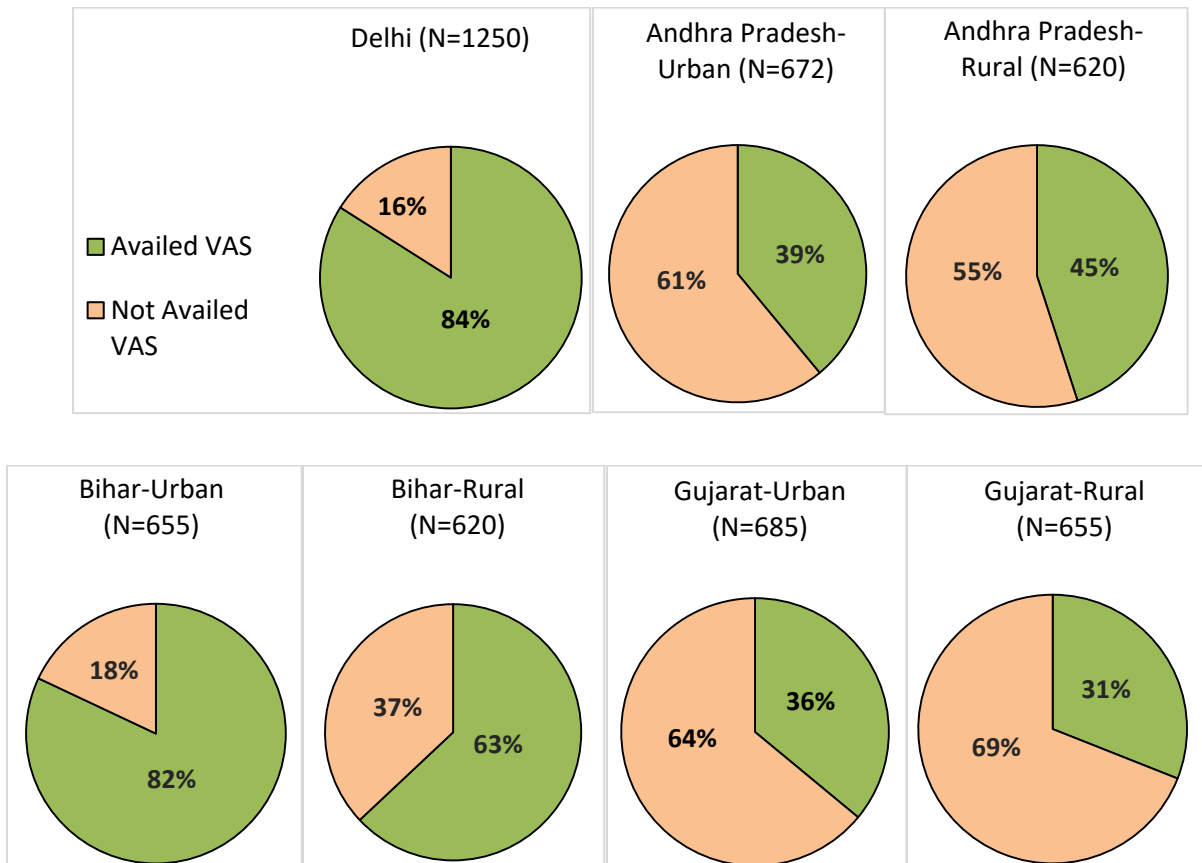


**Figure 6.9: Percentage of Respondents That Had Availed VAS (Overall)**



84% of respondents in Delhi had availed VAS, the highest whereas it was around one-third in Gujarat, the lowest. In Andhra Pradesh, a higher percentage of rural than urban respondents had availed VAS, at 45% and 39% respectively. 82% of respondents in urban and 63% in rural Bihar had availed VAS. This is represented in Figure 6.10.

**Figure 6.10: Percentage of Respondents That Had Availed VAS (LSA)**

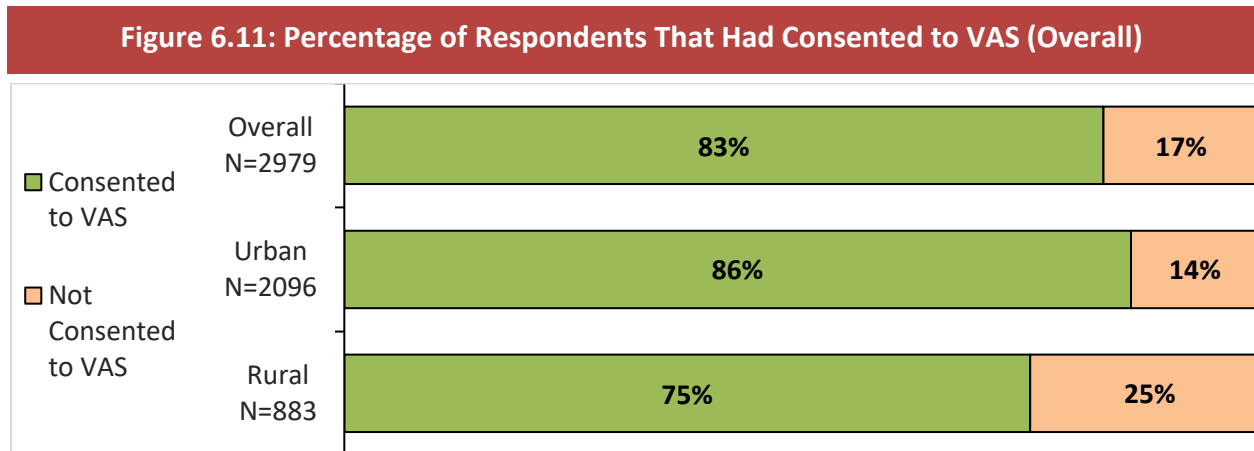


## 6.5.B Consumers that Had Consented to VAS

TSPs cannot provide chargeable VAS without the explicit consent of the subscriber. If a VAS was being provided free of cost earlier, the same cannot be made chargeable without the subscriber consenting to it. Subscribers' consent is to be obtained through telephone, SMS, FAX, e-mail or by other electronic means. This is a key consumer protection measure taken in the light of activating VAS without subscribers' consent yet charging them for it.

### Overall, Residential Area and LSA:

Respondents that had availed VAS were further asked, *'Was your consent taken for activation of Value Added Services (VAS)?'* As seen in Figure 6.11, **83% of respondents had consented to VAS**. In urban areas it was 86% whereas in rural areas it was 75%.

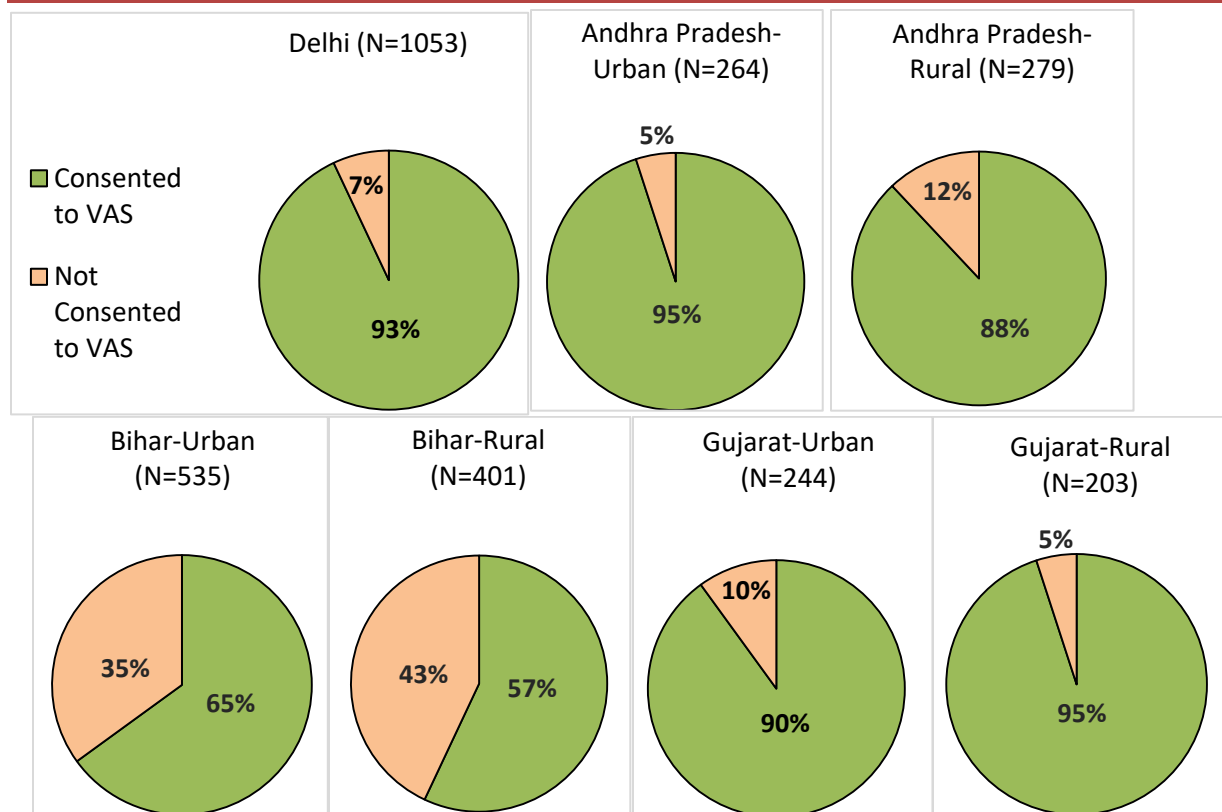


The percentage of respondents that had not consented to VAS was significantly high in Bihar with 35% in urban areas and 43% in rural areas. Around 12% in rural Andhra Pradesh and 5% in urban areas had not consented to it whereas it was 10% in urban and 5% in rural Gujarat. In Delhi, 7% of respondents had not consented. The same is represented in Figure 6.12.

Although a majority of them had consented, the proportion of respondents that had not consented is considerably large indicating that many consumers continue to be victims of such predatory activities by TSPs. Further enquiry into whether instances of VAS activation without consent has increased or

decreased in recent times, and the mode of obtaining consent that is most used would give a clearer picture as to the degree of such a predatory activity.

**Figure 6.12: Percentage of Respondents That Had Consented to VAS (LSA)**



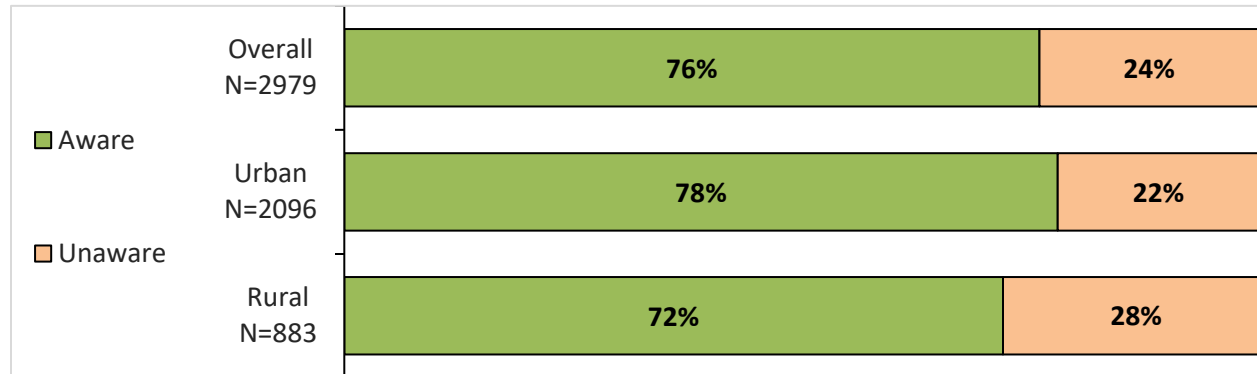
### 6.5.C Consumer Awareness of Deactivation Provisions for VAS

If a consumer so desires, they can deactivate their subscription to a VAS through a simple procedure laid down by the TRAI. Awareness of the option to deactivate VAS is important in the interest of consumer protection, especially if VAS has been activated without the subscribers' consent.

### Overall, Residential Area and LSA:

Respondents that had availed VAS were also asked, *'Is there a provision for deactivation of Value Added Services (VAS)?'* Three-fourths of the respondents were aware of the provision to deactivate. 78% of urban respondents and 72% of rural respondents were aware. This is represented in Figure 6.13.

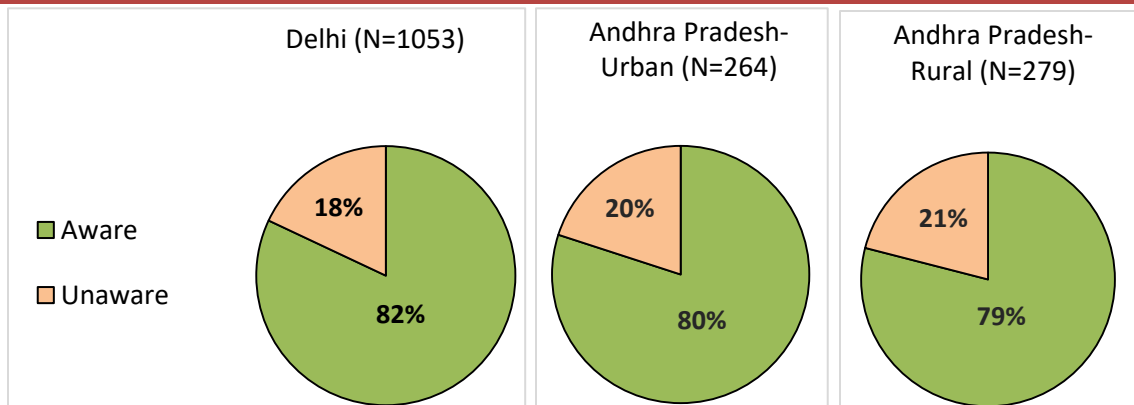
**Figure 6.13: Percentage of Respondents That Knew That VAS Could be Deactivated (Overall)**

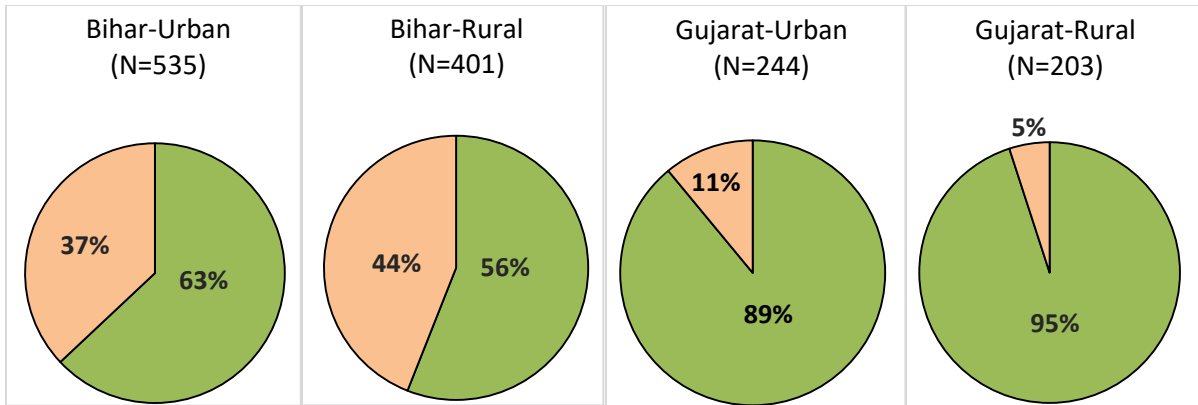


Respondents in Gujarat were most aware with 89% in urban and 95% in rural areas. 82% of respondents in Delhi, followed by 80% in urban and 79% in rural Andhra Pradesh were aware. Bihar showed the lowest awareness with 63% in urban and 56% in rural areas, as represented in Figure 6.14.

The relatively low level of awareness in Bihar when seen alongside with the high percentage of VAS activation without consent in that LSA, suggests that low awareness could result in consumers falling victims to such predatory activities. All LSAs, and particularly Bihar, have potential for increasing awareness of deactivation of VAS and reducing the proportion of consumers for whom VAS gets activated without consent.

**Figure 6.14: Percentage of Respondents That Knew That VAS Could be Deactivated (LSA)**





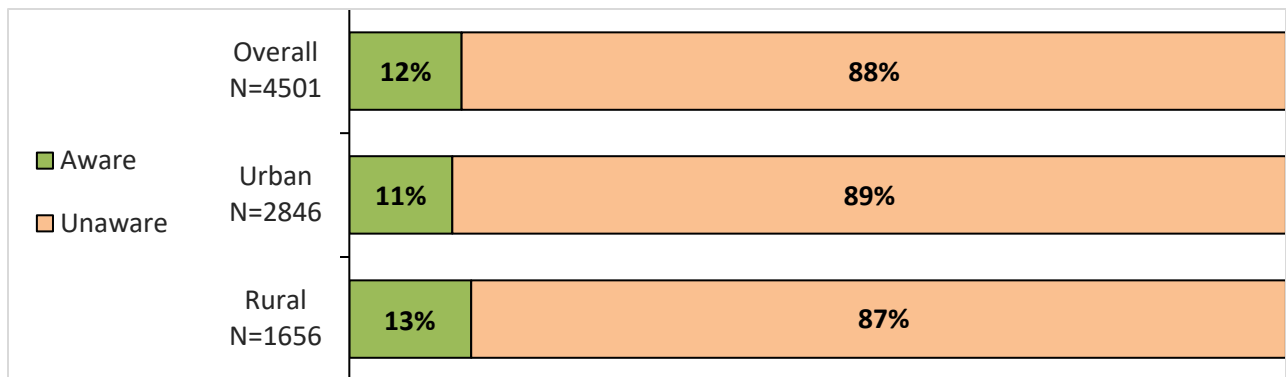
## 6.6 Consumer Awareness of Itemized Usage Charge

TSPs are mandated to provide consumers with Itemized Usage Charges for past usage of services, upon request, at a cost not exceeding Rs.50. This was done in order to provide prepaid subscribers the option of getting itemized details of their service usage just like postpaid subscribers. TSPs are mandated to provide this within 30 days of receipt of the request. The Itemized Usage Charge shall be provided with respect to service such as calls, number of SMS sent, VAS availed, Premium Rate Service availed and the amount charged for these services, and roaming charges.

### Overall, Residential Area and LSA:

Respondents who were prepaid wireless subscribers were asked, *'Being a prepaid subscriber, are you aware that you can get itemized usage charge/bill for all calls/call-wise details, by paying an amount not exceeding Rs.50/- from your telecom service provider?'* 12% of the respondents were aware of this facility, with a slightly higher percentage of respondents aware in rural areas than urban areas. This is represented in Figure 6.15.

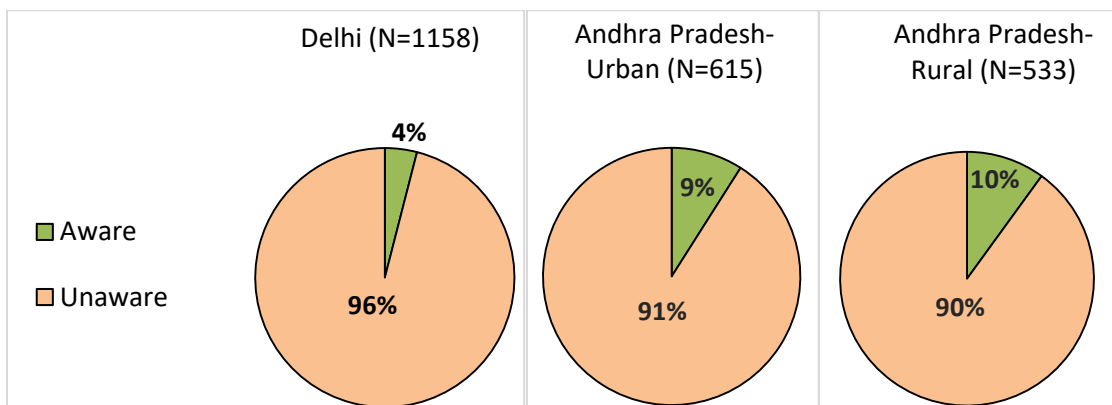
**Figure 6.15: Percentage of Prepaid Wireless Subscribers That Were Aware of Itemized Usage Charge (Overall)**

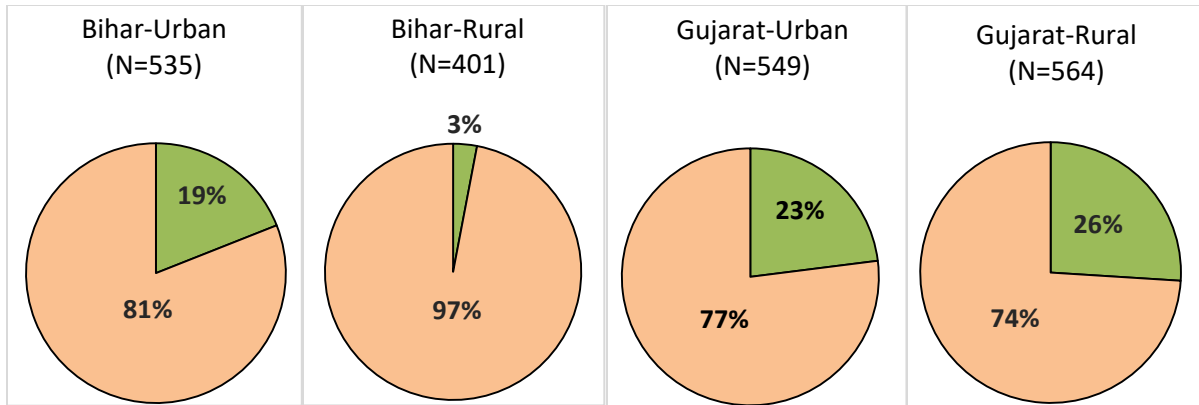


Around a quarter of respondents in Gujarat were aware, the highest among all LSAs. In Andhra Pradesh, 9% were aware in rural areas and 10% in urban areas. Rural Bihar had the least awareness levels with only 3% of respondents aware. There was also a wide difference in awareness between rural and urban Bihar with 19% of respondents aware in the latter. Delhi followed rural Bihar closely with only 4% of respondents aware of Itemized Usage Charges. The same is represented in Figure 6.16.

While awareness levels of this facility can be considered to be low on the whole, it is notably low in a few areas, particularly in metro and urban areas. Possible reasons for this need to be probed further.

**Figure 6.16: Percentage of Prepaid Wireless Subscribers That Were Aware of Itemized Usage Charge (LSA)**





## 6.7 Consumer Awareness of Safe Custody Scheme

*“Safe Custody Scheme means the facility for protection from deactivation for non-usage of a cellular mobile telephone connection of a postpaid consumer on the request of the consumer and on payment of specified amount.”*

TSPs have certain conditions for deactivation of numbers upon non-usage because keeping numbers active for long durations is not favourable to TSPs. However, the lack of a uniform criteria among TSPs and lack of transparency in communicating deactivation to consumers led to practical hardships for the latter. In this view, the Safe Custody Scheme was a measure taken to regulate deactivation.

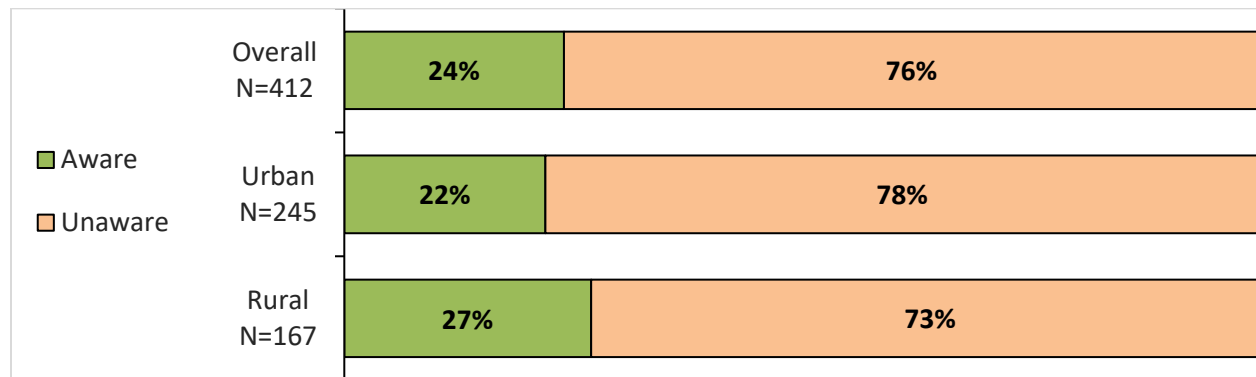
Prepaid subscribers are at a higher risk of having their numbers deactivated than postpaid subscribers because the latter pay monthly rentals which makes them entitled to retain active connections despite non-usage. However, the Safe Custody Scheme enables the postpaid consumer to avoid paying the monthly rental and retain their number in case of non-usage which becomes less financially burdensome.

While an Automatic Number Retention scheme exists for prepaid subscribers for non-usage of numbers subject to certain conditions, postpaid subscribers can make a request for the safe custody of their mobile numbers by not paying an amount exceeding Rs. 150 for every three months. During this period, the TSP cannot charge the monthly rental from the consumer. The TSP will restore the connection within 24 hours of receiving such a request from the consumer during this period.

**Overall, Residential Area and LSA:**

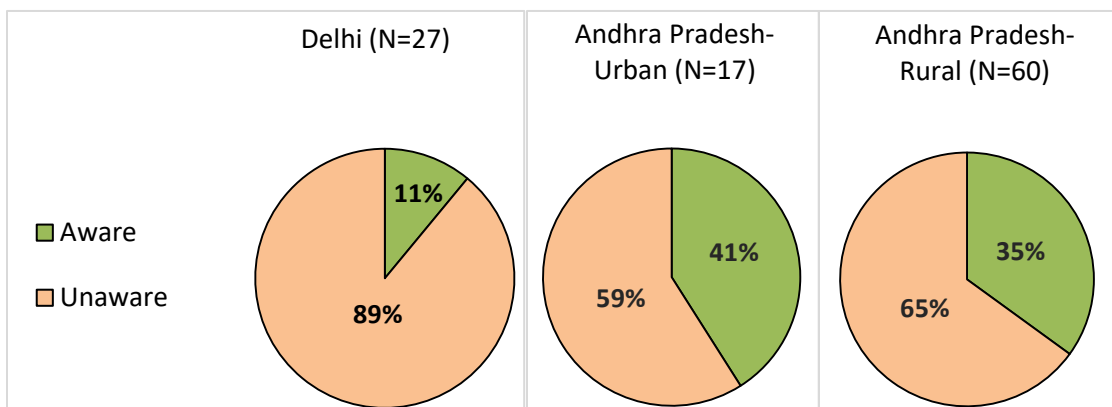
Respondents who were postpaid wireless subscribers were asked, *'Are you aware that post-paid subscriber can keep their number in Safe Custody Scheme by paying an amount not exceeding Rs.150/- for every three months?'* Almost one-fourth of respondents were aware of the Safe Custody Scheme. The awareness levels were higher in rural than in urban areas with 27% and 22% respectively, as represented in Figure 6.17.

**Figure 6.17: Percentage of Postpaid Wireless Subscribers That Were Aware of Safe Custody Scheme (Overall)**

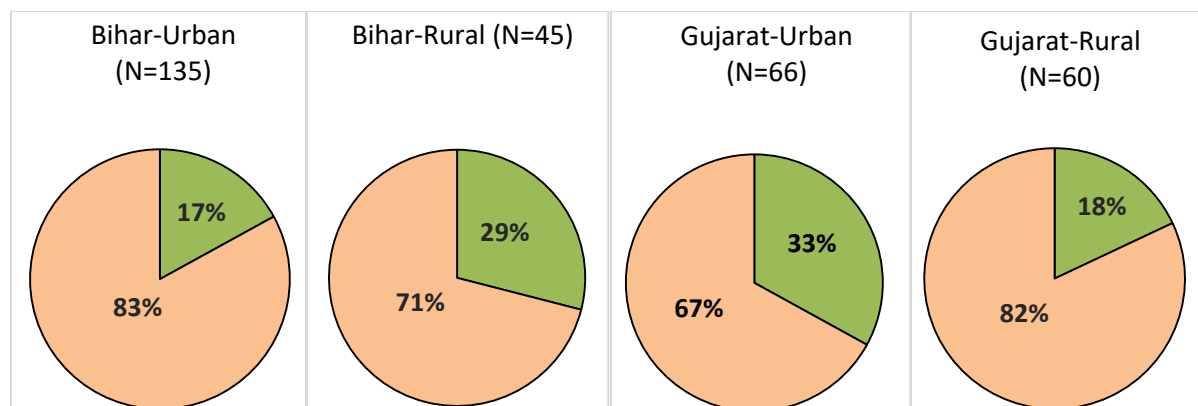


Andhra Pradesh showed the highest level of awareness with 41% in urban and 35% in rural areas aware. This was followed by Gujarat with 33% in urban and 18% in rural areas. 17% in urban Bihar and 29% in rural areas were aware. Delhi showed the lowest awareness at 11%. The same is depicted in Figure 6.18.

**Figure 6.18: Percentage of Postpaid Wireless Subscribers That Were Aware of Safe Custody Scheme (LSA)**







## 6.8 TRAI Directions on Tariff Publication and Advertisement

### 6.8.A Consumer Awareness of TRAI's Directions on Tariff Publication and Advertisement

The TRAI has been entrusted with protecting consumer interests and it has always accorded primary importance to 'transparency'. However, due to confusion arising from what exactly constitutes 'transparency', the TRAI decided to define the term with the 63rd Amendment of TTO by issuing 'Directions on Tariff Publication and Tariff Advertisement' on September 18th, 2020.

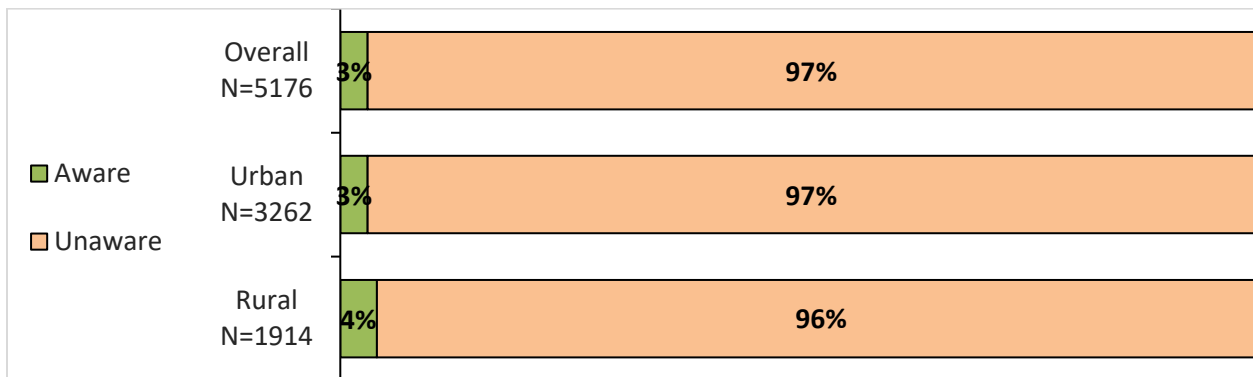
Transparency was defined as, *"The disclosure of all relevant information of every Tariff Plan by the service provider which enables the consumer to make an informed choice. The disclosed information, inter alia, is to be accessible, accurate, comparable, complete, distinct and identifiable, explicit and non-misleading, simple and unambiguous."*

Since existing measures for transparency adopted by TSPs were found to be inadequate, the TRAI mandated with the 'Directions on Tariff Publication and Tariff Advertisement' that TSPs shall prominently highlight additional terms and conditions and shall provide a link to the specific terms and conditions for each of the tariff offerings, wherever required, while disseminating tariff related information, including on their website and mobile applications.

#### Overall, Residential Area and LSA:

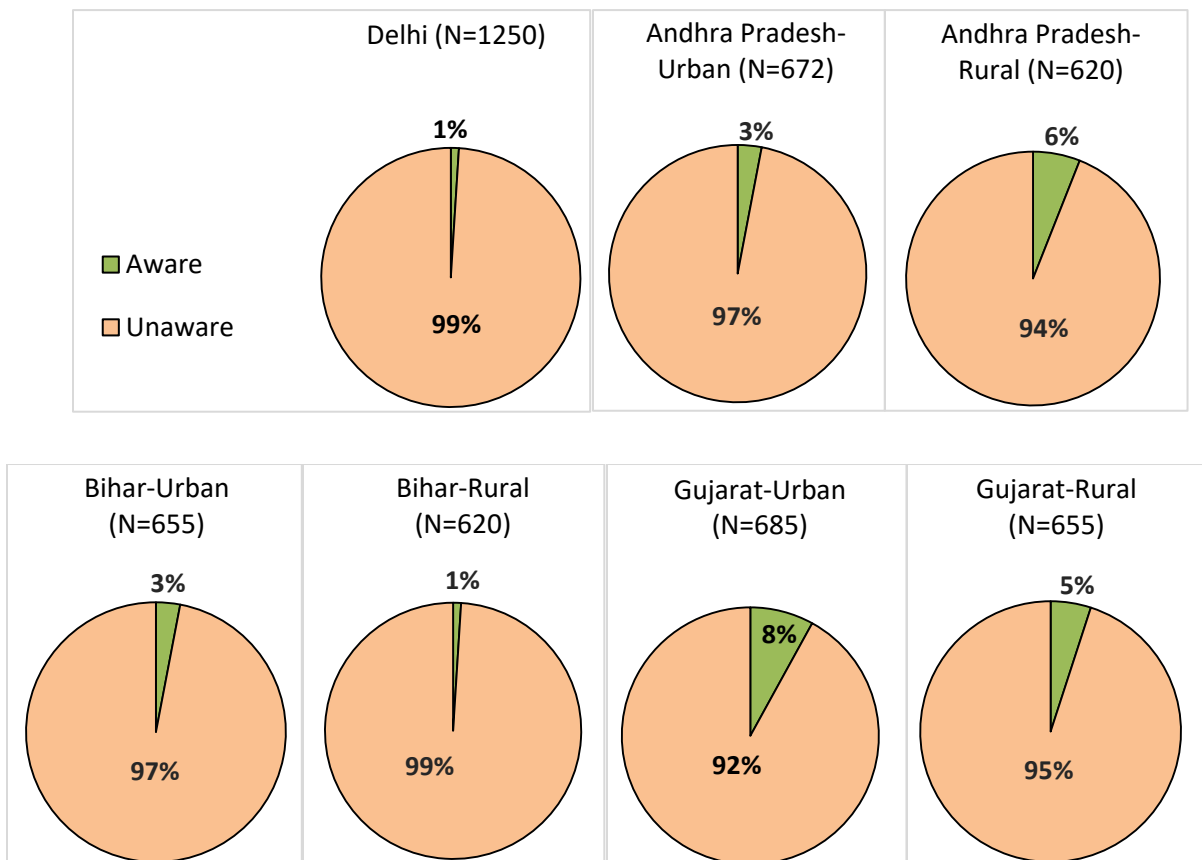
All the respondents were asked, **'Are you aware about recent TRAI Directions on Tariff Publication and Tariff Advertisement issued in consumer interest dated 18<sup>th</sup> September 2020?'** Only 3% of respondents were aware, with rural respondents slightly more aware than urban respondents at 4% and 3% respectively. This is represented in Figure 6.19.

**Figure 6.19: Percentage of Respondents That Were Aware of TRAI's Directions on Tariff Publication and Advertisement (Overall)**



As seen in Figure 6.20, respondents in Gujarat were most aware with 8% and 5% in urban and rural areas respectively. This was followed by Andhra Pradesh with 3% and 6%, and Bihar with 3% and 1% in urban and rural areas. Respondents in Delhi were least aware at 1%.

**Figure 6.20: Percentage of Respondents That Were Aware of TRAI's Directions on Tariff Publication and Advertisement (LSA)**



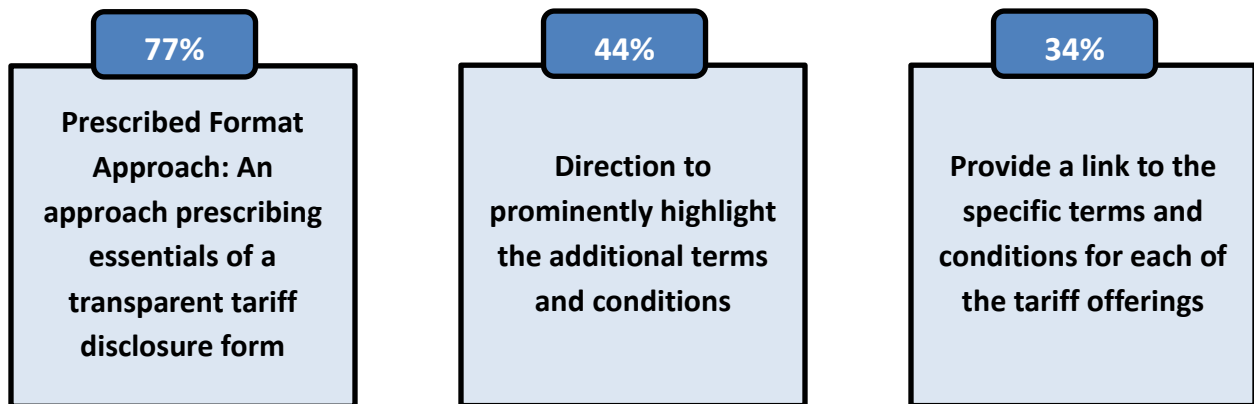
## 6.8.B Awareness of Major Directions

### Overall:

Respondents that were aware of the directions were further asked, *'If aware of TRAI Directions on Tariff Publication and Tariff Advertisement, what are the major points/directions that you are aware about?'*

77% of respondents were aware that the Directions prescribe a format for transparent tariff disclosure. 44% were aware of the Direction that additional terms and conditions must be prominently highlighted by the TSP. 34% were aware that TSPs should provide specific terms and conditions for each of the tariff offerings (including their website/mobile application etc.). This is represented in Figure 6.21.

**Figure 6.21: Major Aspects of TRAI's Directions on Tariff Publication and Advertisement that Respondents were Aware of**



## 6.9 Consumers' Experiences of Discriminatory Tariffs

Discriminatory Tariff can be defined as, *"Issuing misleading offers and arbitrarily discriminating among its own customers subscribing to the same plan."*

In May 2017, the TRAI ordered TSPs to stop providing discriminatory tariffs to subscribers of the same class. This order came upon observing that some TSPs were planning to introduce plans offering discriminatory tariffs to subscribers of the same class without filing it with TRAI.

### Overall, Residential Area and LSA:

In order to evaluate to what extent consumers face discriminatory tariffs, all the respondents were asked, *'Have you ever come across an event of discriminatory tariff offered by a service provider amongst the subscribers of the same class?'*

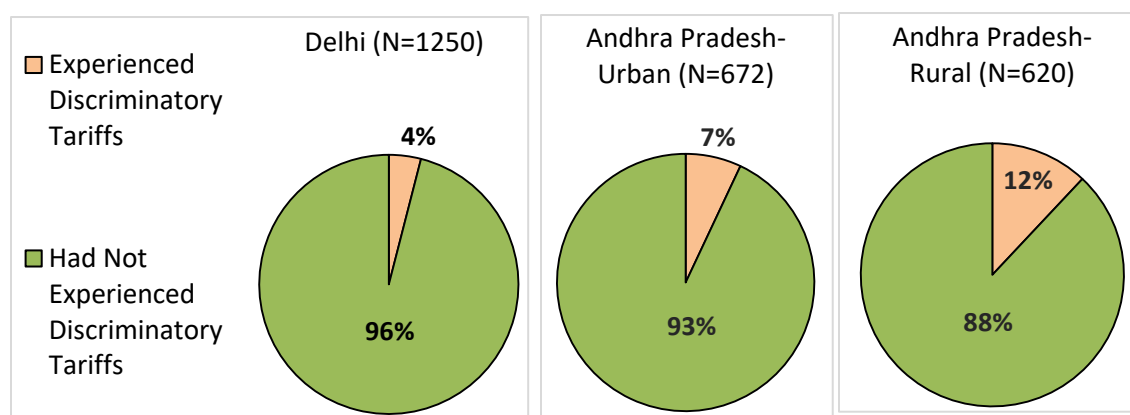
9% of respondents had faced discriminatory tariff, with 7% and 12% of urban and rural respondents respectively. This is represented in Figure 6.22.

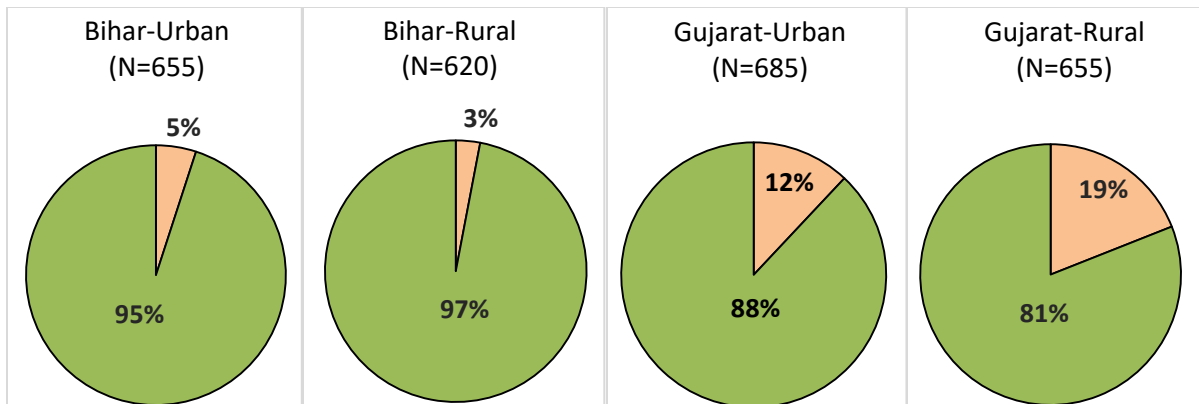
**Figure 6.22: Percentage of Respondents that Had Experienced Discriminatory Tariffs (Overall)**



The largest percentage of respondents that had faced discriminatory tariffs were in Gujarat, with 12% and 19% in urban and rural areas respectively. Gujarat was followed by Andhra Pradesh with 7% and 12% in urban and rural areas respectively. 5% and 3% of respondents in urban and rural Bihar had faced discriminatory tariffs whereas it was 4% in Delhi. This is depicted in Figure 6.23.

**Figure 6.23: Percentage of Respondents that Had Experienced Discriminatory Tariffs (LSA)**





### **Consumer Awareness About TRAI Provisions for Consumer Protection – Summary**

- **39% consumers were aware that a Service Provider cannot change the tariff for at least 180 days from the date of enrolment of a subscriber and 29% consumers were aware that a Service Provider has to give a minimum notice of 30 days before discontinuance of a tariff offer.** Urban consumers were found to be more aware by a huge margin.
- **Overall, more than half of the consumers had either heard of the vouchers or were knowledgeable about their meanings.** Plan Voucher was the most known and heard about. Consumers were least aware of Special Tariff Voucher.
- **Almost two-thirds of consumers (68%), with a higher proportion of urban consumers, were receiving regular information relating to deductions made on service usage.** 79% of consumers who did not receive information were subscribers of unlimited packs.
- **A significant proportion of consumers have availed Value Added Services (VAS), higher in urban areas (64%) than rural areas (46%).** However, around **17% of these consumers had not consented for these services** and 24% of them were not aware about the option of deactivation. Higher levels of awareness were seen among urban consumers.
- **24% of post-paid consumers were aware of the Safe Custody Scheme whereas 12% of pre-paid consumers were aware of the Itemized Usage Bill.** Higher awareness was seen among rural consumers.
- **Only 3% of the consumers were aware of TRAI Directions on Tariff Publication and Tariff Advertisement.** Similar trend was seen across urban and rural consumers.

# 7

## Conclusions and Recommendations

The Consumer Survey commissioned by the TRAI was a comprehensive one that assessed consumers' perspectives on tariff-related issues and general awareness of the regulatory authority's consumer protection measures. Findings on experiences of bill shock, discriminatory tariff, and inadequate disclosure of information helped gauge the prevalence of anti-consumer practices by TSPs and indicated the effectiveness of consumer protection measures. Understanding consumer opinions on aspects such as affordability and adequacy of tariffs, and inquiring into consumer practices in relation to information access, tariff comparisons, utilization of MNP provided useful insights that could be leveraged to enhance consumer protection measures. Evaluating the awareness levels with regard to various measures and regulatory provisions by TRAI indicated to what extent they were working to enhance consumer protection, and which areas of awareness needed boost. The key conclusions that emerged from this survey are summarized hereunder.

### 7.1 Key Conclusions

**Modes of Information Access:** Third Party Websites/Apps were the most preferred mode of accessing tariff related information across all categories. 59% of respondents accessed information through this mode, 9% through TSP Apps and 6% through TSP Websites. The emergence of UPI apps and digital wallets like PhonePe and, which provide added benefits for bill payments made through them, could be a reason for Third Party Websites and Apps overtaking TSP digital platforms as the most preferred mode by telecom consumers.

TSP Retail Channels (18%) were the second most preferred mode, indicating that although digital platforms have overtaken physical retail stores in importance the latter continues to be indispensable to consumers, especially in rural areas. TSP Customer Care (8%) was preferred more than TSP Websites.

None of the respondents who were prepaid wireless subscribers and accessed information through Retail Channels, received physical vouchers.

**User-friendliness of Modes of Information Access:** A significant majority, i.e., 98% of respondents stated that they found their respective modes of information access user-friendly. A reason for high satisfaction levels could be that consumers would invariably prefer to use the mode that they found most user-friendly. Those who did not find the modes user-friendly recommended that the visibility of plans/recharge packs lower than existing packs should be increased, and that filters for searching packs and plans based on price and validity should be made available.

**Tariff Comparisons:** A considerable percentage of respondents tended to find a tariff plan/package that was most suitable to them and continue subscribing to the same without making any tariff comparisons with other service providers. Overall, 38% of respondents did not make any comparisons. This was highest among wireline telephony subscribers, i.e., 71% of them did not make any comparisons.

However, the total percentage of those who did compare, at different frequencies, exceeded those who did not. 34% compared upon every recharge/bill, 21% compared periodically, and 8% upon news of tariff change. Urban respondents made tariff comparisons upon news of tariff change more than their rural counterparts.

**OTT Awareness and Access:** Over half the respondents were aware of OTT services, higher in urban than rural areas. Over 80% of respondents that were aware, knew how to access OTT. Awareness and knowledge of access was inversely proportional to age, with younger respondents being more aware than older respondents. In Bihar, although awareness of OTT was around one-third, more than three-fourths of those who were aware knew how to access it.

**Opinions on Bundling:** Over 50% of the respondents thought that bundling is generally good for consumers, and preferred bundled over standalone offers for themselves. A slightly higher percentage of rural than urban respondents had favourable opinions on bundling. There was wide disparity in outlook towards bundling across LSAs. While only 30% in Andhra Pradesh had favourable opinions on bundling, it was more than double that in Gujarat, the lowest and highest among all LSAs.

40% of respondents who preferred bundled offers stated that they preferred viewing the breakdown of rates of the various components of the bundle. 49% of rural respondents and 38% of urban respondents preferred this.

**Adequacy of Available Tariff Offers:** Most respondents were not completely satisfied with the adequacy of tariff offers. While 63% were partially satisfied and 7% were not satisfied, 30% were completely satisfied. 3% of urban respondents were dissatisfied and in rural areas it was 14%.

Upon enquiring what kind of additional tariff plans were desired by consumers, it was found that most are looking for more value for money within existing tariffs through cheaper plans, longer validity periods, and the option to carry forward unused data. More variety in tariff plans is also desired by consumers, though not as much.

**Affordability of Wireless Tariffs:** 17% of respondents found mobile tariffs very affordable, 74% found them somewhat affordable and 9% did not find them affordable. A significantly higher proportion of rural than urban respondents, i.e., 19% and 4% respectively, did not find them affordable. Additionally, cross-examining affordability with socio-demographic variables showed that older respondents and those with lower education levels tended to find them unaffordable.

**Information Disclosure:** Around one third of the respondents, in both urban and rural areas, were aware of TRAI's mandate to TSPs to disclose tariff-related information prominently. When asked if they found information disclosure to be prominent, almost 80% felt that it was, with a slightly higher percentage of rural than urban respondents. A majority of those who did not think it was prominent, felt that the lack of information related to tariff entitlements, followed by terms and conditions of usage.

While Delhi had the highest percentage of respondents that were aware of the information disclosure, Andhra Pradesh had the lowest. Contrastingly, around 90% of respondents in Andhra Pradesh felt that information disclosure was prominent whereas only 66% of respondents in Delhi felt so. LSAs with a higher awareness of TRAI's information disclosure mandate were the least to feel that information disclosure by TSPs is prominent and vice versa. It could be that awareness of the mandate and what it entails leads consumers to scrutinize whether TSPs are adhering to it, and be more alert to instances where information is not disclosed prominently.

**Bill Shock:** 1% of respondents reported having experienced bill shock. This was highest in urban Andhra Pradesh at 2.2% and lowest in rural Gujarat at 0.2%. Although the percentage of respondents that experienced bill shock was low, when extrapolated to absolute numbers of 1.9 billion telecom subscribers, it would amount to a significant 19 million subscribers on an average having experienced bill shock.

Instances of bill shock included amount deduction after activation of top-up voucher without usage in case of prepaid subscriptions, and plan change in case of postpaid subscriptions. Many of those who experienced bill shock also stated that their grievances were not adequately redressed by the TSPs.

**MNP:** Almost three-fourths of the respondents were aware of MNP, with 76% in urban and 62% in rural areas. Over 90% were aware in Delhi and Gujarat as opposed to less than 60% in Andhra Pradesh and Bihar. 20% of respondents overall had ported their numbers. 39% of respondents had ported their numbers in Delhi while it was less than half of that in the other LSAs. 82% of the respondents stated that they had ported due to poor quality of service or connectivity issues. A search for better tariff offering was the second major reason for porting.

**Validity of Vouchers:** 32% of respondents were aware that TSPs are mandated to provide at least one voucher with a 30-day validity. The difference between urban and rural areas was considerable with 41% in the former and 16% in the latter. There was disparity between LSAs as well, with almost two-thirds aware in Delhi and less than one-thirds in other LSAs.

Similar trends were observed with regard to the mandate to provide at least one voucher that is rechargeable on the same day of every month. 37% respondents overall, 43% in urban and 25% in rural areas were aware. Considering that this mandate was introduced as recently as February 2022, the awareness levels can be interpreted as being significantly high.



**Important Factors in Choosing Service Providers:** Quality of service (48%) was the most important factor for more than half the respondents, followed by internet speed (20%) and cheaper tariffs (17%). Internet speed remained the second most important factor in rural areas whereas it was cheaper tariffs in urban areas, suggesting that low internet speeds is experienced extensively in rural areas. Quality of service was the most important factor in all LSAs except Gujarat where it was customer care quality in urban areas and internet speed in rural areas.

Quality of service was the most important factor for all age categories as well. However, for older respondents, cheaper tariff was the second most important whereas it was internet speed for younger respondents.

**Tariff Change Without Information:** 11% of respondents had faced tariff change without information, with a slightly higher percentage of rural than urban respondents. Andhra Pradesh had a significantly higher percentage with 17% in urban and 26% in rural areas. It is possible that important communication through SMS from TSPs to consumers may be getting perceived as spam or fraud messages and being ignored.

**Regulations Relating to Tariff Change:** 38% of respondents were aware that TSPs were not allowed to change the tariff for at least 180 days from the date of enrolment of a subscriber. A significantly higher percentage of urban respondents, i.e., 48% were aware as opposed to 21% of rural respondents were aware. The disparity in awareness between LSAs was wide, with 89% aware in Delhi and less than 13% in Andhra Pradesh, the highest and lowest respectively.

**Regulations Relating to Discontinuance of Tariff:** 29% of respondents were aware that TSPs are required to provide 30-days' notice before discontinuance of tariff. Like the previous indicator, a higher percentage of urban than rural respondents were aware, at 37% and 15% respectively. Once again, respondents in Delhi were most aware at 73% and those in Andhra Pradesh were least aware at less than 11%.

**Different Types of Vouchers:** Respondents were most aware of Top Up and Plan Voucher and least aware of Special Tariff Voucher. With regard to all the vouchers, a majority of them had either only heard of them or were unaware of them. A small proportion, less than 15%, were aware of and understood what the vouchers meant. Delhi had the highest percentage of respondents that had either heard of or were aware of the vouchers whereas Andhra Pradesh had the lowest percentage.

**Notifications on Service Usage:** Over two-thirds of prepaid wireless subscribers said that they were receiving regular notifications on usage of call, SMS and data services. 73% of urban and 59% of rural respondents were receiving notifications. There was a disparity among LSAs with over 90% of respondents in Gujarat receiving notifications as opposed to less than 40% in Bihar. However, 79% of those who did not receive notifications were subscribers of unlimited packs.

**VAS:** 58% of respondents had availed VAS, with 64% in urban and 46% in rural areas. Usage of VAS varied across LSAs. Gujarat had the lowest percentage of respondents, less than 36%, that had availed VAS whereas more than double that, 84% had availed VAS in Delhi. 83% of those who had availed VAS stated that they had consented to it, and 76% were aware of deactivation.

Interestingly, Bihar had a relatively high percentage of respondents that had availed VAS, but also the highest percentage of respondents that had not consented to it, and unaware of deactivation. This indicates that low awareness can make consumers vulnerable to predatory activities.

**Itemized Usage Charge and Safe Custody Scheme:** 12% of prepaid wireless subscribers were aware of the Itemized Usage Charge and 24% of postpaid wireless subscribers were aware of the Safe Custody Scheme. Respondents in Gujarat showed the highest awareness of Itemized Usage Charge whereas those in Andhra Pradesh showed the highest awareness of Safe Custody Scheme.

**TRAI Directions on Tariff Publication and Advertisement:** Only 3% of respondents were aware of the TRAI Directions on Tariff Publication and Advertisement. Of these, 77% were aware of the direction that TSPs have to follow a prescribed format for transparent disclosure of tariffs.

**Experience of Discriminatory Tariff:** 9% of respondents reported having experienced discriminatory tariffs, with rural respondents double that of urban respondents. Gujarat had the highest percentage of respondents that had experienced discriminatory tariff whereas Delhi had the lowest.

## 7.2 Recommendations

❖ **More Value-for-Money Wireless Tariffs Can Be Provided:** A substantial proportion of consumers, particularly those from the rural areas and those with a low capacity to spend did not find wireless tariffs affordable. Moreover, wireless subscribers were also the most dissatisfied with the choice of existing tariffs indicating that there is room for improvement.

On the other hand, the range of tariffs available in the wireless category is higher than other categories, with innovative standalone and bundled plans/packs being introduced regularly and irrelevant plans being discarded according to changing demands. India also has some of the cheapest mobile tariff rates and one of the lowest Average Revenue Per User (ARPU) rates in the world. The tariff rates are deemed to be unsustainably low for TSPs, many of whom are facing falling levels of gross revenues for TSPs and have posted losses in recent years. This is due to the disruption of the telecom market caused by the entry of Reliance Jio in 2016 which offered unlimited data and calls. The TSPs may hike their tariffs in an effort to keep the businesses sustainable. But **it is precisely those consumers who do not find tariffs affordable who would be sensitive to even small tariff hikes.**

The issue of affordability of tariffs is therefore tied to a number of factors, most crucially in the present context, a healthy and competitive environment for the TSPs to thrive. Addressing the issue of tariff affordability and its impact on consumer welfare requires reform at the level of the business environment that the TSPs operate in.

However, based on consumers' suggestions of additional tariffs that should be made available, tariffs with a higher value for money can be provided. Make-your-own-plans, the option to carry forward unused data, can be considered as more achievable to meet consumer needs in this context.

- ❖ **Increasing OTT Awareness and Adoption:** OTT services provided as bundled offerings are relatively more economical than standalone subscriptions of OTT. This, along with convenience of access and shift in consumer preferences in content viewing, has increased penetration of OTT services offered by TSPs.

OTT platforms, particularly OTT messaging apps, are inexpensive substitutes to TSPs' own voice and messaging services. They have been a major source of revenue loss for TSPs' messaging services. On the other hand, as mentioned earlier, TSPs are drawing higher levels of their data revenue from data consumed to access OTT services while OTT platforms are increasing their market share through distribution by TSPs. The telecom-OTT partnership is therefore a win-win not only for the two parties but also consumers for the above-mentioned reasons.

Usually, awareness does not necessarily lead to adoption due to existing, perhaps undetected barriers. However, the findings on OTT awareness suggested that higher awareness led to higher usage. The segment of consumers that are not yet aware of and accessing OTT is quite large. The rate at which OTT awareness has increased has been high. So have the adoption levels among those who are aware. This signifies the easy potential to capture untapped segments of consumers, particularly in semi-urban and rural areas and older age groups.

- ❖ **Displaying Price Breakdown of Bundled Offerings:** Half the respondents had favourable opinions towards bundling and the other half did not suggesting that along with standalone offerings, bundling meets the needs of a large segment of consumers especially in the rural areas. Furthermore, displaying the price breakdown of bundled offers could be an additional step towards ensuring consumer welfare.

Displaying the breakdown of rates does not disadvantage consumers who prefer to not view the breakdown. On the other hand, it provides crucial information that assists consumers, especially those who are socio-economically disadvantaged, in making more informed decisions.

Therefore, provision of the breakdown of rates of bundled services can be taken up for consideration as a measure to further improve transparency of tariffs. This needs to be done in close consultation

with TSPs by understanding their perspectives on the issue, and ensure that such a measure would not adversely affect their pricing and marketing strategies.

- ❖ **Increasing Awareness of MNP:** A possible reason for low MNP rates despite high awareness levels could be that a majority of surveyed respondents expressed average to high levels of satisfaction on a number of indicators, and are currently satisfied with their TSPs.

However, although Delhi and Gujarat had similar levels of MNP awareness, a considerably larger proportion of respondents in Delhi had ported than in Gujarat. Therefore, another possible reason for low MNP rates could be access to information or knowledge of the process involved in porting. If measures were to be taken to improve awareness of MNP and the process of utilizing it, it may result in more consumers utilizing this facility in their own interest.

**Increasing Awareness of TRAI's Measures and Regulatory Provisions for Consumer Protection:** In general, consumers showed low awareness of measures and regulatory provisions by TRAI for consumer protection. The disparity in awareness across LSAs was significant in many cases, with Andhra Pradesh showing consistently low levels.

While the TRAI has put in place numerous relevant provisions for consumer protection, increasing awareness of what they are entitled to as consumers would result in consumers being more proactive in looking out for their own interests and flagging cases of irregularities. For instance, consumers that were aware of the information disclosure mandate were more likely to feel that information disclosure by TSPs is not prominent.

- ❖ **Increasing Awareness of TRAI's Consumer Protection Measures:** Consumers were found to have relatively low awareness levels of TRAI's consumer protection measures. TRAI can employ creative and targeted communication strategies through the use of social media and other platforms most accessed by consumers, in order to increase awareness of its consumer protection measures. Higher awareness of their rights and entitlements would lead consumers to be more vigilant of malpractice by TSPs and engage more proactively in the protection of their rights. Increasing awareness through third party digital platforms such as social media and retail channels can be considered since these were consumers' most preferred modes of accessing information.
- ❖ **Further Studies Needed:** As mentioned above, this consumer survey showed varying results across the four LSAs. If a more extensive survey were to be conducted, preferably across all LSAs, the results of that survey would explain whether the trends are particular to that LSA or shared by LSAs from the same zones. Moreover, a more in-depth survey would give an opportunity to go into the causes and reasons for trends that were observed in this survey.

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## Annexure: Survey Tool

**Telecom Regulatory Authority of India (TRAI)**  
**CONSUMER SURVEY IN RESPECT OF TARIFFS OF TELECOMMUNICATION SERVICES**  
**& RELATED ISSUES**  
**Consumer Facing Survey**

CS- RESPONDENT INFORMATION PANEL			
<b>CS2.</b> Mode of Data Collection:		Offline	1
		Online	2
<b>CS3.</b> Interviewer's Name  FIRST NAME _____ LAST NAME _____		<b>CS4.</b> Supervisor's Name:  FIRST NAME _____ LAST NAME _____	
<b>CS5.</b> Day / Month / Year of interview:    ___ ___ / ___ ___ / <u>2022</u>			
<b>CS6.</b> LICENSED SERVICE AREA/CIRCLE		ANDHRA PRADESH/TELANGANA	1
		BIHAR/JHARKHAND	2
		DELHI	3
		GUJARAT	4
<b>CS8.</b> RESIDENTIAL AREA:  (OPTION N/A APPLICABLE ONLY FOR CS6 DELHI)		RURAL	1
		URBAN	2
		N/A	99
<b>CS9.</b> Type of sampled respondent		WIRELINE TELEPHONY	1
		WIRELINE BROADBAND	2
		STANDALONE ISP	3
		WIRELESS/MOBILE	4
<b>CS10.</b> Mobile Number of Respondent		.....	
<b>CS11.</b> Landline Number of Respondent		.....	
<b>CS7 STATE OF RESIDENCE</b>  <span style="color: blue;">(END THE INTERVIEW IF CS6 NOT SAME AS CS7)</span>		ANDHRA PRADESH/TELANGANA	1
		BIHAR/JHARKHAND	2
		DELHI	3
		GUJARAT	4
<b>CS12.</b> START TIME: _____			



## INFORMED CONSENT

### CS 13. Consent

Hello, my name is [YOUR NAME]. We are from Academy of Management Studies, a consultancy based in Delhi, and we are conducting this survey on behalf of Telecom Regulatory Authority of India (TRAI). We are conducting a survey to understand how consumer decides tariff selection and what affects their choice of telecom service provider. We are here to ask you some questions on your understanding and awareness of consumer protection regulations. These questions for you can take up to 20 – 30 minutes to complete.

I can come/call back tomorrow if we do not have enough time to go through all the questions today. All the answers provided by you will be confidential and will only be shared for professional and learning purposes. Your identity shall not be disclosed on any publicly available data or reports. You are not obligated to participate, but we hope you will agree to answer the questions since your opinion is important. If I ask you any question you don't want to answer, let me know and I will go on to the next question or you can stop the interview at any time.

In case you need more information about the survey, please contact the Research Analyst, Ms. Madhurima A. at AMS India Delhi Office [+91 8800595815].

Do you have any question about the survey/questions or about your participation?

<b>DO YOU AGREE TO PARTICIPATE IN THE SURVEY?</b>	YES	1	IF 1 – Q 1.1 (Section 1)
	NO	2	IF 2 – CS 14

## INTERVIEW RESULT SUMMARY SHEET

To be completed after each visit to the Household (in case of Offline Mode of Data Collection) and after the interview is completed (in case of Online Mode of Data Collection)

<b>CS 14. Result of Consumer Survey (DISCUSS ANY RESULT NOT COMPLETED WITH SUPERVISOR)</b>	Completed	1
	No competent member available at the time of interview	2
	Refused	3
	Partly completed/ postponed	4

## 1. Details of Current Service Being Used by Respondents (Consumers)

SN	Question	Options	Code	Skip
<b>READ TO RESPONDENT: "I would like to ask you some questions about your socio-economic profile, current telecom service provider and the nature of subscription."</b>				
1.1	Name of Subscriber	.....		
1.1a	Name of the Respondent	.....		
1.1b	Relation to the subscriber	Self	1	
		Spouse	2	
		Son/Daughter	3	

		Son/Daughter-in-law	4	
		Grandchild	5	
		Parent	6	
		Sibling	7	
		Father/Mother-in-law	8	
		Nephew/Niece	9	
		Other Relative	10	
1.2	Gender	Male	1	
		Female	2	
		Transgender/Others	3	
1.3	Age (enter in years)	(only 18+ to be considered) (If less than 18 years end the interview)		
1.4	Education	Illiterate	1	
		Till 5 <sup>th</sup> standard	2	
		6 <sup>th</sup> – 10 <sup>th</sup> standard	3	
		11 <sup>th</sup> – 12 <sup>th</sup> standard	4	
		Diploma/Undergraduate	5	
		Post-Graduation & above	6	
		Literate, but no formal education	7	
1.5	Primary Occupation/Primary Activity  (Activity in which major time is spent)	Agriculture and allied activities	1	
		Fish rearing/ Fishing	2	
		Artisans	3	
		Skilled Labourer	4	
		Unskilled Labourer	5	
		Wage or Salaried Employee - Government	6	
		Wage or Salaried Employee – Private	7	
		Self-employed	8	
		Small enterprise or business	9	
		Pension	10	
		Homemaker	11	
		Student	12	
		Unemployed, looking for employment	13	
		Any other (please specify)	97	
1.6	Nature of Subscription (for the sampled category)	Pre-paid	1	
		Post-paid	2	
1.7	Name of Service Provider (for the sampled category)	Bharti Airtel	1	
		BSNL	2	
		MTNL	3	
		Reliance Jio	4	
		Vodafone Idea	5	
		Atria Convergence Technologies (ACT) Pvt. Ltd.	6	
		Hathway Cable & Datacom Pvt. Ltd.	7	
		GTPL Broadband Pvt. Ltd.	8	

		ONEOTT ENTERTAINMENT LTD	9	
		Excitel Broadband Private Limited	10	
		Alliance Broadband Services Pvt. Ltd.	11	
		Tikona Infinet Pvt Ltd	12	
		D-Vois Broadband Private Limited	13	
		Indinet Service Pvt Ltd	14	
		Fusionnet Web Services Pvt. Ltd.	15	
		Ishan Netsol Pvt Ltd	16	
		Limras Eronet Broadband Service Pvt Ltd	17	
		DEN Broadband Limited	18	
		Siti Broadband Services Pvt. Limited	19	
1.8	Duration of time since when respondent has been availing the services provided by current service provider (for the sampled category)  <i>(Instruction:</i> <ul style="list-style-type: none"> <li>• <i>If less than one month, record '1' and record '00' in Months.</i></li> <li>• <i>If less than 12 months, record '1' and record in Months.</i></li> <li>• <i>If 1 year/12 months or more, record '2' and record in Years.)</i></li> </ul>	MONTHS AGO ___ __	1	
		YEARS AGO __ __	2	
		DON'T KNOW	96	
1.9	Different types of services subscribed by the respondent	Wireline Telephony	1	<i>(Multiple Response)</i>
		Wireline Broadband	2	
		Standalone ISP	3	
		Wireless/Mobile	4	

## 2. Respondents Perspective on Tariff

**READ TO RESPONDENT: "Now we would like to know your perspective on Tariff, that is, the rate and related conditions to all the services that one has availed"**

**("Tariff" means rates and related conditions at which telecommunication services within India and outside India may be provided including rates and related conditions at which messages shall be transmitted to any country outside India, deposits, installation fees, rentals, free calls, usage charges and any other related fees or service charge)**

SN	Question	Options	Code	Skip
Easy to locate or source				

2.1	How do you generally access information relating to tariff offers?  <b>(Instruction: Single Selection. Ask and record most accessed source)</b>	Service Provider Website	1	
		Service Provider App	2	
		Third Party Website/Third Party App	3	
		Service Provider Customer Care	4	
		Service Provider Retail Channels (Offline)	5	
		Others (Please specify)	97	
2.1a	Do you find –(option selected in Q2.1)– user friendly?	Yes	1	Skip to 2.2 if Code 1
		No	2	
2.1b	If No, what changes would you suggest?	Plans/ recharge packs lower than the existing plan should be made visible	1	<b>(Multiple choice)</b>  Skip to 2.2
		Filter for searching packs/plans based on price (low price to high price or vice versa)	2	
		Filter for searching packs/ plans based on validity period	3	
		Reduce the waiting period to connect to the customer care personnel	4	
		Cordial behaviour of the supporting staff	5	
		Retail channels should be bias free (they should not favour or promote a particular service provider)	6	
		Others (Please specify)	97	
2.1c	Do you receive colour coded physical vouchers from the respective retail channels?  <b>(Applicable for Prepaid Mobile Customers alone i.e. this question should appear only when for CS9 = 4 and Q1.6 = 1)</b>  <b>(Applicable if Q2.1 = 5)</b>	Yes	1	Skip to 2.2 if Code 2
		No	2	
2.1d	If Yes, do you feel the concept of colour coding the physical vouchers as useful?	Yes	1	
		No	2	
<b>Easy to understand &amp; compare</b>				

2.2	How often do you compare tariffs offered by various Service Providers?	Every time I recharge my account <i>(Not applicable for post-paid users i.e. this option should not appear for Q1.6 = 2)</i>	1	
		I make tariff comparisons periodically	2	
		I make tariff comparisons when I come across some news of change in tariff	3	
		I don't make such comparison: I just select one of the tariff offerings suggested by my Service Provider/Third Party Website/Service Provider Retailer	4	
2.3	<p>Are you aware about the Over the Top (OTT) services offered by service providers along with tariff offers/ Vouchers?</p> <p>(Vouchers will include STV and CV)</p> <p><b><i>(Over the Top (OTT) - When a provider delivers audio, video and other media over an IP network (such as the internet), bypassing the traditional operators' network completely.)</i></b></p>	Yes	1	Skip to 2.5 if Code 2
		No	2	
2.4	Do you know how to access Over the Top (OTT) services?	Yes	1	
		No	2	

2.5	<p>Do you think the bundling/packaging of telecom and non-telecom products such as Over the Top (OTT) applications, DTH etc. are good for the consumer?</p> <p><b>(Definition – Bundling</b> (of telecommunication services) is defined as grouping various telecommunications services -- wire line and/or wireless -- as a package to increase the appeal to potential customers and reduce advertising, marketing and other expenses associated with delivering multiple services. For example, a bundled package could include long distance, cellular, Internet and paging services.</p> <p><b>Over the Top (OTT)</b> - When a provider delivers audio, video and other media over an IP network (such as the internet), bypassing the traditional operators' network completely.</p> <p><i>Instruction: The RI may give the example of popular OTT platforms such as Netflix, Amazon Prime, Disney Hotstar etc., and Tata Sky DTH etc., to the respondent)</i></p>	Yes	1	
		No	2	
2.6	Given a choice between a bundled/packaged offer of telecom and non-telecom	Bundled/Packaged offer of telecom and non-telecom products	1	Skip to 2.7 if Code 2

	products such as Over the Top (OTT) applications, DTH and standalone telecom tariff. What would you prefer?	Standalone Telecom Tariff	2	
2.6.1	Given a choice would you prefer to have the break-up of charge/rate in the tariff offer in case of bundled offers?	Yes	1	
		No	2	
<b>Whether tariffs on offer serve the need of consumers?</b>				
2.7	Do you think there are enough tariff offers/recharge packs available to suit the requirements of the customers?	Yes, completely	1	Code 2 to be used if the respondent has modified their needs as per the existing options provided by the service provider
		Yes, partially	2	
		No	3	
2.8	In addition to the existing plans, which tariff offer/recharge packs do you feel should be made available by the Service Providers?	Cheaper/ Low cost data plans	1	<i>(Multiple Options)</i>  <i>(If Code 9 is opted; selection of other options needs to be disabled)</i>
		Availability of make-your-own-pack with selected features	2	
		Diversity of options in varying price points	3	
		Extent the validity for longer duration	4	
		Option to carry forward unused data for a given day till the expiry period of the pack/plan <i>(Not applicable for post-paid users i.e. this option should not appear for Q1.6 = 2)</i>	5	
		Diversity in plans/packs exclusively for calls and SMS	6	
		Diversity in voice only recharge packs	7	
		Diversity in data only recharge packs	8	
		No additional changes required	9	
		Others, please specify	97	

2.9	What is your view on the affordability of mobile telecommunication tariff?	Very Affordable	1	
	<i>(Applicable for Mobile Customers alone i.e. this question should appear only when CS9 = 4)</i>	Somewhat Affordable	2	
		Not Affordable	3	

3. Respondents Awareness about Consumer Protection Measures				
SN	Question	Options	Code	Skip
3.1	Are you aware that the Service Providers are required by Telecom Regulatory Authority of India (TRAI) to disclose all related information prominently?	Yes	1	
		No	2	
3.2	Have you ever felt that some important information relating to tariff has not been disclosed prominently?	Yes	1	Skip to 3.4 if Code 2
		No	2	
3.3	The lack of information relates to  <i>(To be asked if response to previous question is yes)</i>	Tariff entitlements	1	(Multiple Response)
		Bundled Non-Telecom Services	2	
		Detailed Terms and Conditions of usage	3	
		Details of Fair Usage Policy (FUPs) or Citizen Charter	4	
		Details of Internet speed <i>(Applicable for Wire-line Broadband and ISP users alone i.e. this option should appear only for CS9 = 2 or 3)</i>	5	
	Other, please specify	97		
3.4	Have you ever been a victim of bill shock i.e., have you ever come across a situation when some charges have been levied on your account without your knowledge/consent?	Yes	1	Skip to 3.6 if Code 2
		No	2	
3.5	Please specify the details of an incident when some charges (e.g. bill shocks) were levied on your account without your knowledge /consent.	(mention date/year and the incident) -----		



3.6	<p>Are you aware that you can port/transfer to the Service Provider (Mobile Number Portability - MNP) of your choice without changing your number?</p> <p><i>(Applicable for Mobile Customers alone i.e. this question should appear only when CS9 = 4)</i></p>	Yes	1	
		No	2	
3.7	<p>Have you ever ported/transferred (MNP) your number to some other operator?</p> <p><i>(Applicable for Mobile Customers alone i.e. this question should appear only when CS9 = 4)</i></p>	Yes	1	Skip to Section 3.9 if Code 2
		No	2	
3.8	<p>What was the reason for porting/transferring out from the current Service Provider?</p> <p><i>(Applicable for Mobile Customers alone i.e. this question should appear only when CS9 = 4)</i></p>	Quality of Service/Connectivity Issues	1	<i>(Multiple Response)</i>
		Search for better tariff offering	2	
		Search for a better bundle of telecom and non-telecom products such as OTT applications, DTH etc.	3	
		Quality of customer care service	4	
		Issues of lack of services to low value pre-paid customers <i>(Option applicable only to pre-paid customers; i.e. option should appear when Q1.6 =1)</i>	5	
		Any Other, please specify	97	
3.9	<p>Are you aware that the Service Providers are mandated to provide at least one plan voucher, one special tariff voucher and one combo voucher having validity of 30 days?</p>	Yes	1	<i>(Applicable if CS9=4 and Q1.6=1 i.e. this question should be asked to sampled pre-paid mobile customers alone)</i>
		No	2	
3.10	<p>Are you aware that the Service Providers are mandated to provide at least one plan voucher, one special tariff voucher and one combo voucher rechargeable on same date of every month?</p>	Yes	1	
		No	2	

4. Respondents Views on Other Related Issues				
SN	Question	Options	Code	Skip
4.1	What is the most important factor for choosing a service provider (TSPs/ISPs)?  <i>(Single Selection, if more than one response is given, select most important factor)</i>	Cheaper tariff options	1	
		Quality of Service	2	
		Choice of bundled/package non-telecom services such as Over the Top (OTT) applications, DTH etc. offered by the Service Providers	3	
		Quality of customer care	4	
		Internet Speed	5	
		Any Other, please specify	97	
4.2	Have you ever come across a situation in which your tariff has been changed without your information?	Yes	1	
		No	2	

5. Respondents Awareness about TRAI Regulatory provisions for Consumer Protection				
SN	Question	Options	Code	Skip
<b>READ TO RESPONDENT: "Now we would like to know whether you are aware of certain regulatory provisions for consumer protection. Please let me know, for each of these statements, whether you are aware of provisions or not."</b>				
5.1	Are you aware that a Service Provider cannot change the tariff for least 180 days from the date of enrolment of a subscriber?  <i>(Not applicable for Wire-line Broadband and ISP users i.e. this question should not appear CS9 = 2 or 3)</i>	Yes	1	
		No	2	
5.2	Are you aware that a Service Provider has to give a minimum notice of 30 days before discontinuance of a tariff offer?	Yes	1	
		No	2	
5.3a	Have you ever heard of or do you know what a Top Up Voucher is?  <i>(Applicable for Prepaid Mobile Customers alone i.e. this question should appear only when CS9 = 4 and Q1.6 = 1)</i>	Yes, I have heard about Top Up Voucher	1	
		Yes, I understand ("Top Up Voucher" means a paper voucher or an electronic voucher providing additional monetary value to the pre-paid consumer without any restriction in terms of validity or usage)	2	
		No	3	
5.3b		Yes, I have heard about STV	1	

	Have you ever heard of or do you know what a Special Tariff Voucher (STV) is?  <i>(Applicable for Prepaid Mobile Customers alone i.e. this question should appear only when CS9 = 4 and Q1.6 = 1)</i>	Yes, I understand ( <b>“Special Tariff Voucher”</b> or <b>“STV”</b> means a paper voucher or electronic voucher, which on activation <b>alters one or more items of applicable tariff</b> in the consumer tariff plan for a period not exceeding ninety days in terms of limited or unlimited usage of voice calls, SMS or data but <b>does not provide any monetary value</b> )	2	
		No	3	
5.3c	Have you ever heard of or do you know what a Plan Voucher (PV) is?  <i>(Applicable for Prepaid Mobile Customers alone i.e. this question should appear only when CS9 = 4 and Q1.6 = 1)</i>	Yes, I have heard about PV	1	
		Yes, I understand ( <b>“Plan Voucher”</b> means a paper voucher or electronic voucher that enrolls a consumer into a tariff plan)	2	
		No	3	
5.3d	Have you ever heard of or do you know what a Combo Voucher (CV) is?  <i>(Applicable for Prepaid Mobile Customers alone i.e. this question should appear only when CS9 = 4 and Q1.6 = 1)</i>	Yes, I have heard about CV	1	
		Yes, I understand ( <b>“Combo Voucher”</b> or <b>“CV”</b> means a paper voucher or electronic voucher which on activation <b>alters one or more items</b> , for a period not exceeding ninety days, in the tariff plan of the consumer and <b>adds monetary value</b> to the pre-paid account of the subscriber)	2	
		No	3	
5.4	Being a pre-paid subscriber, are you regularly getting information through SMS or USSD, relating to deductions made on every call/every session of data usage/Value Added Services (VAS)/Activation or Deactivation of data services?  <i>(Applicable for Prepaid Mobile Customers alone i.e. this question should appear only when CS9 = 4 and Q1.6 = 1)</i>	Yes	1	If Code 1 skip to Q 5.5
		No	2	
5.4.1	If No, please specify the service for which you did not receive SMS or USSD	For calls	1	<i>(Multiple choice)</i>
		For data	2	
5.4.2		Yes	1	

	Are you subscribing an unlimited pack?	No	2	
5.5	Have you ever availed Value Added Services (VAS)? (missed call alert, caller tune, live cricket score, voice mail box, on demand video subscriptions, music subscriptions, online games, online storage etc.)	Yes	1	(Skip to 5.6 if Code 2)
		No	2	
5.5.1	Was your consent taken for activation of Value Added Services (VAS)?	Yes	1	
		No	2	
5.5.2	Is there a provision for deactivation of Value Added Services (VAS)?	Yes	1	
		No	2	
5.6	Being a pre-paid subscriber, are you aware that you can get itemized usage charge/bill for all calls/call-wise details, by paying an amount not exceeding Rs.50/- from your telecom service provider? <i>(Applicable for Prepaid Mobile Customers alone i.e. this question should appear only when CS9 = 4 and Q1.6 = 1)</i>	Yes	1	
		No	2	
5.7	Are you aware that post-paid subscriber can keep their number in Safe Custody Scheme by paying an amount not exceeding Rs.150/- for every three months? <i>(Applicable for Post-paid Mobile Customers alone i.e. this question should appear only when CS9 = 4 and Q1.6 = 2)</i>	Yes	1	
		No	2	
5.8	Are you aware about recent TRAI Directions on Tariff Publication and Tariff Advertisement issued in consumer interest dated 18 <sup>th</sup> September 2020?	Yes	1	Skip to if Code 2
		No	2	
5.8.1	If Yes, what are the major points/directions that you are aware about?	Prescribed format approach: An approach prescribing essentials of a transparent tariff disclosure form	1	(Multiple Options)

		Direction to prominently highlight the additional terms and conditions	2	
		Provide a link to the specific terms and conditions for each of the tariff offerings (including their website/mobile application etc.)	3	
		Others, please specify	97	
		No	2	
5.9	Have you ever come across an event of discriminatory tariff offered by a service provider amongst the subscribers of the same class?  <i>(Discriminatory Tariff: Issuing misleading offers and arbitrarily discriminating among its own customers subscribing to the same plan)</i>	Yes	1	
		No	2	
CS15.	End Time			
<b>Capture GPS</b>				

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