

BHARAT JYOTI ADVOCACY GROUP (BJAG)

CONSULTATION PAPER ON REGULATION OF IMR ROAMING

SERVICES

ISSUES FOR CONSULTATION

COMMENTS BY BHARAT JYOTI ADVOCACY GROUP

Q1. Should not the IMR service remain inactive at the time of issue of the SIM till the same is activated by the subscriber as part of the IMR tariff-selection exercise?

Comment: BJAG is of the view that that IMR service should remain inactive,until asked for by the subscriber. There should be no automatic activation of the International Roaming,unless specifically asked by the subscriber. This will save an unsuspecting subscriber from any bill shock ,whosoever happens to take his /her mobile phone abroad,by mistake or otherwise will be protected from any bill shock. In case of automatic international roaming,the subscriber will still have to pay heavily for any incoming voice call and data on installed Apps on his mobile,without actually using IMR services.

Q2. Should it not be mandatory to communicate the details of activation and applicable tariff immediately by SMS or e-mail on completion of the tariff-selection exercise by the subscriber ?

Comment: It should be mandatory on the part of the Telecom Service Provider (TSP),to communicate the details of activation and applicable international roaming tariff of International Mobile Service / International Roaming,to the subscriber,aspiring to visit abroad. Yes,it should be by SMS and e-mail, on completion of the selection of the tariff plan by the subscriber. This will avoid any bill shock to the subscriber, later on.

Q3. Should not the tariff details and related terms and conditions be communicated to subscribers of IMR service by SMS and/or e-mail as soon as the phone is switched on in the visiting country by the subscriber.

Comment: It is already partly covered in question 2. It should be mandatory on the part of the Telecom Service Provider (TSP) to communicate the tariff and its terms and conditions of International Roaming,to the subscribers by SMS and e-mail,whosoever seek it ,before embarking on the journey abroad .The TSP must communicate the tariff and related terms and conditions in details ,in respect of the International Roaming,to the subscribers,,and who have not taken International Roaming beforehand in their home country,in the visiting country,who switch on their mobile phones in the visiting country.

Q4. Please give your views on the significant differences in tariffs for IMR Service under Standard Rates and IR Packs. Furthermore, your views are solicited as to how these two rates can be rationalized.

Comment: There should not be any significant difference (more than two times) in tariffs for International Roaming under Standard Rates and IR Packs. As a matter of fact, the total expense on International Roaming, in a day (24 hours or calendar day, in any country abroad) under Standard Rate, should never exceed One Day's IR Pack. Standard Rates for International Roaming need to be standardised especially to U.S.A, U.K. Europe, Australia, New Zealand, Singapore, the countries which the Indians visit frequently.

Q5. Should not the IR packs apply automatically the moment subscriber's expenses on IMR Services exceed the corresponding daily IR Pack rate unconditionally for all the countries for which the service provider is offering IR Packs.

Comment: We, the BJAG agree that it will be a big relief to the visiting subscriber, if the subscriber's expenses on IMR Services in a day (24 hours or a calendar day in a particular country) are limited to daily IR Pack Rates unconditionally and automatically, for all the countries for which the Telecom. Service Provider is offering daily IR Pack service.

Q6. Can IR Packs presently offered for one day duration be used to subscribe for multiple days to avail IMR Service ? Whether the TSPs be mandated to permit combination of different IR plans as per requirement of the consumer?

Comment: IR Packs need to be made more flexible. These should be available for 1,3,5,7,9,11,13,15,21,30 days. Yes, the IR Packs presently being offered for one day duration should also be available for multiple days, but the expenses should again be limited to the IR Packs rate for different number of days. It will certainly give more relief to the Internationally roaming subscriber, if TSPs are mandated to permit combination of different IR Plans, as per the requirement of the Telecom. Consumer.

Q7. Why should not the IMR tariff be counted in 24 hour format on the first use of data, making or receiving a call or sending a text message and renewing the charges for only those 24 hour periods in which the services have been used rather than on calendar day basis.

Comment: We, in India should implement the best practices followed in other prominent countries like U.S.A, U.K., JAPAN, FRANCE, AUSTRALIA, SINGAPORE. IMR tariff should be counted in 24 hour format or part of it, in a particular country, from the time of making or receiving first voice call, data or sending a text message, and renewing the charges for only those 24 hours periods in which the services have been utilized rather than on calendar day basis, as is being followed by AT&T and some other TSPs in U.S.A. In case, the international roaming subscriber happens to travel to another country during his stay abroad, he/she should be charged for part of the 24 hour format, as a full day. The 24 hour format has to

restart in the next destination abroad, the moment he/she starts making/receiving calls, data, sending messages.

Q8. In a consumer interest why it should not be mandated for the service providers to send updates in respect of the data usage exceeding certain pre-established milestones such as 50%,80%,90% and 100% of the data entitlement?

Comment: There is a need of increasing the consumer awareness, as to the IMR or International Roaming Tariff Plans, as more and more Indians are visiting foreign destinations for a holiday, commerce/business, education etc.. The Advocacy Groups can certainly provide the platform and spread awareness about the prevailing international tariffs, plans, amongst the Telecom. Consumers, provided there is enough awareness amongst the Advocacy Groups themselves. TRAI must introduce the best practices followed in the leading Telecom. Countries, as regards to IMR Services. The consumer must be protected from any shock bill, once he/she returns to India, after a happy sojourn in a foreign country.

It will be in the fitness of things and in the interest of the Consumers, if TSPs are mandated to send updates in respect of the data usage, exceeding pre-established milestones of data entitlement.

Q9. Will it not be advisable to mandate the TSPs to inform the subscriber by SMS every time the subscriber lands in a country not covered by the IR Pack subscribed, of the fact of roaming in an uncovered zone, and the tariffs applicable thereto? Would the aforesaid requirement suffice or whether alongside this, the TSPs be mandated to keep the mobile data in the inactive mode and activate only in accordance with the directions of the subscriber? Are there any other measures that can be taken to cover the situation as detailed/

Comment: Yes, there may be scenarios when the Service Subscriber happens to land in a country, which is not covered by plans. This can happen during Air Travel in transit through another country or while on a cruise passing through different countries and stopping at some places for a short duration. In order to protect the Consumer from any Bill shock, it will be advisable to mandate the TSPs to inform the subscriber automatically, by SMS every time the subscriber lands in a country/area not covered by the IR Pack subscribed, of the fact of roaming in an uncovered zone, and the tariffs applicable thereto.

We feel the Mobile Data should not be forcibly made inactive at TSP end (Let it be the choice of the subscriber), as in some situations, the subscriber may be wanting to make an urgent international call, due to some emergency unforeseen circumstances.

Q10. What are your views on the measures suggested in para 3.21 to protect the consumer from bill shocks due to usage of services beyond the pack entitlements? Please

provide your views on each of the above measures and suggest additional measures, which in your opinion can be helpful in addressing the issue.

Comment: The measures as suggested in para 3.21 will certainly be helpful in preventing any Bill shock from the usage of Telecom Services abroad, to the consumer.

3.21 a: We feel that there should n't be any barring of the usage of any or all of the services once the plan entitlements are exhausted. The subscriber should only be informed of the consequences, once the subscriber reaches the plan entitlement. In a foreign country, it may be sometimes difficult to speak to the Customer Care Facility of the TSP back home and SMS also may not help in reactivating the service, once terminated abruptly.

3.21b: Capping the amount that can be charged to the consumer in any situation, to the amount of the credit limit fixed by the TSP for the subscriber or any other limit pre-agreed by the consumer at the time of activation of the IMR Service, will go a long way in protecting the interest of the consumers.

3.21c: We agree that the TSP SHOULD CHARGE FOR ANOTHER DAILY IR Pack, if the usage exceeds the entitlements given in the IR Packs instead of levying the Standard Rates, after the usage exceeds the plan entitlement.

For Bharat Jyoti Advocacy Group,

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CONVENOR