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## FEDERATION OF CONSUMER AND SERVICE ORGANIZATIONS

Promoted exclusively to deal with the pressing issues..

(Regd. No.CAG/01/2016 as a Consumer advocacy group with TRAI)

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The Chairman

Telecom Regulatory Authority of India,  
New Delhi

12.07.2020

Kind attention to: Shri Kaushal Kishore, Advisor (F&EA-II)  
Sir,

Sub: **forward our view on Consultation Paper Regulations of  
International Mobile Service – reg:**

In continuation of above Consultation paper and the present consultation paper focuses on the review of the regulatory framework to prevent instances of bill shocks to consumers availing IMR Service. The uniqueness of IMR Service vis-à-vis other alternatives implies a de facto monopoly of the Home Operator and raises concerns of any potential abuse of monopoly power resulting in adverse consequences for the consumer, be it in the form of abusive tariffs or a general lack of transparency in the communication of tariffs leading to a situation of bill shocks.

We respectfully submit our view on above consultation paper for your kind perusal and necessary amendment in the interest of Consumer at large:

. **Question 1: Should not the IMR service remain inactive at the time of issue of the sim till the same is activated by the subscriber as a part of the IMR tariff-selection exercise? Please elaborate your submissions.**

Ans: Yes. It should remain inactive till the subscriber decides to activate it.

Question 2: Should it not be mandatory to communicate the details of activation and applicable tariff immediately by SMS or email on completion of the tariff-selection exercise by the subscriber? Please give your views.

Ans: Yes. The details should be communicated to enable the subscriber to re-consider his/her decision to activate, if required

Question 3: Should not the tariff details and related terms and conditions be communicated to subscribers of IMR service by SMS and /or email as soon as the phone is switched on in the visiting country by the subscriber. Please elaborate your views.

Ans: . Yes. Such communications would alert the subscriber on the cost implications of activating the IMR service, in different countries.

These measures will ensure that there are no "shocks" while receiving the bill from the service provider for such services.

Question 4: 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.

Ans: No comments.

Question 5: 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?

Ans: It would be appropriate if the subscriber is automatically informed by sms once the expenses on IMR services exceed the daily IR pack rate.

Question 6: 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? Please elaborate your submissions.

Ans: No commens.

Question 7: 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? Please elaborate your submissions.

Ans: Yes.

Question 8: In 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 Please give your views..

Ans: Yes. As being done now by Internet Service Providers with respect to data usage.

Question 9: Will it not be advisable to mandate the TSPs to inform the subscriber 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? 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?

Ans: Yes. It should be informed by SMS and also the mobile data should be kept in inactive mode, till the subscriber decides to activate it.

Question 10: What are your views on the measures suggested in para 3.20 to protect the consumer from bill shocks dues to usage of services beyond the pack entitlements? Please provide your views on each of the above measure and suggest additional measures, which in your opinion can be helpful in addressing the issue.

Ans: All three may be provided in the interest of consumers, if technically feasible.

Question 11: Any other issue relevant to the subject discussed in the consultation paper may be highlighted

Ans: No..

Thanking You, Sir,

Yours Sincerely,



M. Sekaran.

President,

Reg. CAG with TRAI.