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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)

No.5, 4th Street, Lakshmipuram,
Tiruchirappalli – 620 010. T.N. State .

The Secretary

Telecom Regulatory Authority of India,

New Delhi – 110 002

28.12.2019

Kind attention to: Shri Amit Sharma, Advisor, (F& EA)

Dear Sir,

Sub: Our view on Consultation Paper on Traffic Issues of Telecom Service – reg:

We most respectfully attach our view for kind consideration in the larger interest of the telecom consumer as follow:

1. As observed that the total number of wireless data subscribers are increased from 281.58 million at the end of year 2014 to 664.80 million at the end of September 2019 with the existing infrastructure.
2. The numbers of subscribers are increased to double with the infrastructure with the existing or slightly improved. That is the reason, why the TSPs are giving such a cheaper price for data. Even in this stage, the revenue on data has also increased to more than double from 2014. In the year 2014 the revenue from data was Rs.22,225 Crore and it was increased to Rs.54671 Crore in the year 2018.
3. The total numbers of wireless subscribers are 1173.75 million out of these the only 664.80 are data subscribers. The subscribers (1173.75 million), those who prefer combo plan, they have to avail with data, but they are unable to utilise the data (TSPs are having most the plan combo with data plan).

4. The TSPs would introduce the plan without data considering, the data could use only 4 G subscriber and the subscribers with 2 G unable to utilise, so some plan may introduce without data and only with voice as well as SMS and others.
5. As observed rightly, the technologies are not one and the same, the some subscribers are using 2G, and others are using 3G and 4G respectively. This is being the status, how the Authority could fix the one floor price for the different categories.
6. Apart usages of the data shows that usages of 4 G is so high compare with the 3 G and 4 G. Such as 2 G usages 337 million data, 3 G 3748 million G.B data and 4 G is the highest of 50832 million GB data. So, these fixations of floor price on data only consider after convert all towers to 4 G.
7. As one of the member of Consumer Advocacy Group, we well aware about the connectivity at rural as well as semi urban. We are facing mounting pressure from the consumer's side at the Consumer Awareness Programmes conducting at rural and semi urban. The TSPs irrespective of the company, they are not concentrating the rural areas. We are facing problems at the CAPs and received large numbers of complaint against poor tower connectivity and regarding Data, there is no connectivity.
8. Regarding City also the consumers are facing data connectivity and slow speed problems due to high density, the numbers of the data subscribers are increased to double without increase required infrastructure.
9. Before approach to the authority for pricing, the TSPs first should provide sufficient and equal service to the telecom consumers.

10. Finally, the healthy competition among the Service providers would help to the consumers in providing better quality of service. A Govt. owned various Insurance Companies are under the control of General Insurance Corporation of India even before privatisation of insurance sector for only healthy competition. The small TSPs have closed their activities and few of the remaining TSPs have uniformly increased the pricing now.

Considering the above, our view is, this is not right time to consider the COAI plea in fixation of Floor Price considering the category of services are different to one another and the subscribers are unable utilize the permitted data level consider no connectivity at rural and semi urban and high density at the urban. This may consider that all towers would have converted 4 G and with permitted speed and connectivity.

Thanking You, Sir,
Yours Faithfully,

M. Sekaran.
President.
Reg. CAG with TRAI.

03/03