



कुलशासक, प्रायोजित शोध एवं औद्योगिक परामर्श कार्यालय  
Dean, Sponsored Research & Industrial Consultancy Office

भारतीय प्रौद्योगिकी संस्थान रुड़की

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REGISTERED

IIT Roorkee

No. IITR/SRIC/ 599 /G-2(Misc.)  
Dated : February 20, 2020

The Advisor (Finance & Economic Analysis)  
Telecom Regulatory Authority of India  
Maha Nagar Door Sanchar Bhawan,  
Jawaharlal Nehru Marg (Old Minto Road),  
New Delhi-110002

Subject: Consultation Paper on "Transparency in Publishing of Traffic Offers issued on 27<sup>th</sup> November 2019: Soliciting your valuable comments on the question raised in the Consultation Paper".

Sir,

Kindly refer to your letter No.301-16/2019-F&EA (PT) dated 05.12.2019 on the above subject addressed to Prof. Ajit K.Chaturvedi, Director, IIT Roorkee, Roorkee.

I am directed to enclose herewith a copy of the comments by concerned expert faculty member of this Institute (Prof.J.K.Nayak) for your kind perusal and for further action if any.

Thanking You

Yours Faithfully

  
19.02.2020

Encl: As above

Asstt. Registrar (SRIC-Admn.)

**Consultation Paper**  
**On**  
**Transparency in Publishing of Tariff Offers**

**Issues for consultation**

**Question 1: Whether TRAI should prescribe any format for publishing tariff?  
Please support your answer with rationale.**

Yes, TRAI should prescribe a standard format to service providers for publishing tariff. A prescribed standard format for publishing the tariff will significantly help in making information more effective, transparent and understandable which is to be accessed by the customers.

**Question 2: If the answer to the Question 1 is yes, then please give your views regarding desirability of publishing tariffs on various modes of communication viz., TSP website/Portal, App, SMS, USSD message, Facebook, WhatsApp, Twitter, Customer care centers, Sales outlets etc. If the answer to the question is that tariffs should be published on multiple channels as above, please state whether TRAI should prescribe a separate format for each channel. Please also suggest the essentials of the format for each channel.**

Yes, tariffs should be published on multiple communication channels i.e., TSP website/Portal, App, SMS, USSD message, Facebook, WhatsApp, Twitter, Customer care centers, Sales outlets etc. TRAI should prescribe single standard format for tariff publication on all the above channels. This way, there will be no confusion among the customers to access and understand the information from different channels and this will eliminate instances of adverse choices made by consumers. Format should incorporate the essentials like clear and full information related to tariff plans, tariff plans information with symbolic representation for illiterate consumers, and clear disclosure (terms & conditions) of the respective information.

**Question 3: Whether the extant format prescribed for publishing tariff at TSP's website conveys the relevant information to consumers in a simple yet effective manner? If no, please provide the possible ways in which the same can be made more effective?**

*J. K. Jayal*  
30.01.2020

No, the extant format prescribed for publishing tariff at TSP's website does not convey the relevant information to consumers in a simple and effective manner. In some of the TSPs, Information related to tariff plans is unclear to customers to understand and decide the optimal tariff plan as per their requirement. Space in the website is not being properly utilized. Website space should be properly utilized by putting the new tariff offers in the home page via pop-up buttons. Tariff plans should be arranged in a sequence from recently launched to the existing ones with all the information including date of implementation and terms & conditions. One of the interesting ways of conveying the tariff plans' information is by symbolic representation of tariff plans information which will be interesting, beneficial and effective as well to the less educated customers especially.

**Question 4: Whether the service providers be required to publish all the tariff offerings and vouchers in addition to the publishing of tariff plans, in the prescribed format? Please provide rationale for your response.**

Yes, the service providers should be required to publish all the tariff offerings and vouchers in addition to the publishing of tariff plans, in the prescribed format. By implementing this, there will be transparency in conveying and accessing the tariff information between the service providers and consumers.

**Question 5: Whether there is a need to mandate TSPs to introduce a tariff calculator tool to convey the effective cost of enrolment and continued subscription? If yes, what can be the essential features of such a tool? If the answer is in negative, then please give reasons for not mandating such a tool.**

Yes, there is a need to mandate TSPs to introduce a tariff calculator tool to convey the effective cost of enrolment and continued subscription. The essential features of such a tool which may be incorporated are as follow:

- Outgoing calls (Min/ hour/ Unlimited)
- Incoming calls (chargeable/ unlimited)
- Data usage
- Subscription Validity

**Question 6: Whether the service providers be asked to disclose clearly the implications of discontinuation of tariff plan after expiry of mandatory tariff protection period of six months on the provision of non-telecom services offered as a part of the bundle at the time of subscription to a particular plan?**

**If yes, what should be the exact details that service providers may be required to provide in case of bundled offerings? If the answer is in negative, then please give reasons for not mandating such a disclosure.**

Yes, the service providers should be asked to disclose clearly the implications of discontinuation of tariff plan after expiry of mandatory tariff protection period of six months on the provision of non-telecom services offered as a part of the bundle at the time of subscription to a particular plan. The details that service providers may be required to provide in case of bundled offerings should be as follows: clear information of the tariff plan and bundled offerings, free subscription period with date of expiry, notification via SMS on one month prior to expiry of tariff plan implications of discontinuation of tariff plan, and additional charges of extending the tariff plan after the free subscription period.

**Question 7: Whether the service providers be required to provide a declaration while reporting tariffs to TRAI and displaying tariffs through its various channels that there are no terms and conditions applicable to a tariff offering other than those disclosed here? Do we require additional measures to ensure that all the terms and conditions are clearly communicated to the subscribers and the Authority? If the answer to the above is yes, then please provide your suggestions in detail. If you do not agree with the above requirement, please provide detailed reasons for the same.**

Yes, the service providers should be required to provide a declaration while reporting tariffs to TRAI and displaying tariffs through its various channels that there are no terms and conditions applicable to a tariff offering other than those disclosed here. If the service providers are made to declare the norm that they have incorporated all the terms and conditions in tariff plans clearly, then their declaration regarding the tariff plans' terms & conditions are sufficiently enough.

**Question 8: Whether the service providers be required to publish details of all plans in the prescribed format including the plans not on offer for subscription but active otherwise? Please support your answer with rationale.**

Yes, the service providers should be required to publish details of all plans in the prescribed format including the plans not on offer for subscription but active otherwise. In this way, consumers can compare the plans (subscription offers and active ones which are not on offer), observe the variation between the existing and the new ones and decide the optimal choice for the new offer subscription.

*J. K. Alayan*  
30.1.2020

**Question 9: Whether the service providers be required to update the information on point of sale and retail outlets simultaneously with the launch/change of a tariff offer?**

Yes, the service providers should be required to update the information on point of sale and retail outlets simultaneously with the launch/change of a tariff offer to eliminate the time lag between the updation in websites and updation on point of sale and retail outlets. Service providers can be given the maximum period of 7 days to update the same on point of sale and retail outlets after the launch of tariff plan. This way, the consumers will have the access to the requisite information on retail outlets level too just after the launch of new tariff plans when they are likely to decide on choice of plan.

**Question 10: Whether the tariffs published in prescribed formats are displayed on websites of the service providers in an effective manner? If no, should the manner of display on website may also be prescribed by the Authority? If it is felt that the manner of display on website may be prescribed by the Authority, please give your views on the proposed display framework.**

No, the tariffs published in prescribed formats are not displayed on websites of the service providers in an effective manner. In some of the TSPs, Information related to tariff plans is unclear to customers to understand and decide the optimal tariff plan as per their requirement. Website space should be properly utilized by putting the new tariff offers in the home page via pop-up buttons. Tariff plans should be arranged in a sequence from recently launched to the existing ones with all the information including date of implementation and terms & conditions. One of the interesting ways of conveying the tariff plans' information is by symbolic representation of tariff plans information which will be interesting, beneficial and effective as well to the less educated customers especially.

**Question 11: What are your views on introduction of concept of unique id and requiring the service providers to link the tariff advertisements etc. with corresponding tariffs published in TRAI prescribed formats including requirements to publish dates of implementation of tariff and that of reporting of tariff. Do you think that any other safeguards need to be introduced? If yes, please elaborate. Please support your answer with rationale.**

The idea of introducing the concept of unique id and requiring the service providers to link the tariff advertisements etc. with corresponding tariffs published in TRAI

prescribed formats including requirements to publish dates of implementation of tariff and that of reporting of tariff is quite appreciable. This will ensure reporting of all the tariff plans, distinguishing each and every plan and non-occurrence of contravention activity by the service providers.

**Question 12: Whether the proposed monitoring and compliance mechanism is enough to deter any violation of compliance with applicable regulations/directions. If no, please suggest further safeguards that may be introduced to ensure a robust monitoring and compliance mechanism.**

Yes, the proposed monitoring and compliance mechanism is enough to deter any violation of compliance with applicable regulations and directions.

**Question 13: Any other issue relevant to the subject discussed in the consultation paper may be highlighted.**

No, each and every possible issues are discussed in the consultation paper.

*J.K. Nayak*

*30.01.2020*

**Dr. J.K. Nayak**  
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