



भारतीय प्रौद्योगिकी एवं उद्यमी विकास संस्थान

INDIAN INSTITUTE OF TECHNOLOGY & ENTREPRENEUR DEVELOPMENT (IITED)

(AN INSTITUTE OF RESEARCH, ACTION FOR DEVELOPMENT)

ISO 9001: 2018 CERTIFIED ORGANISATION

वेबसाइट/Website - www.iited.in

Ref.D-685/TRAI/2024-25

Date: 17/08/2024

To

Shri Amit Sharma,
Advisor (Finance & Economic Analysis)
TRAI, New Delhi

Subject: Comments on "Consultation Paper on Review of Telecom Consumer Protection of Regulations (TCPR), 2012"

Dear Sir,

IITED is registered with TRAI as CAG member. IITED has the following comments to offer on the above cited consultation paper and hope will be useful in finalising the guidelines in connection with TCPR- 2012.

Question 1: How do current tariff plans offered by telecom service providers align with the preferences and usage patterns of consumers, particularly elderly individuals? Please Justify with rationale.

At present mostly bundled plans offered by telecom service providers. Bundled plans having data Plan with unlimited local calls, STD and roaming are being offered. Elderly individuals or even common consumers who are not using bundled facilities should have an option to choose bundled plan or separate Plans.

Question 2: Is there a need for separate plans for Voice & SMS and data to meet the specific requirements of subscribers. Please justify with reasons.

Yes. There is need for separate Plans for Voice & SMS and Data with clear details of Plans. Bundled recharge plans in the market today (which include calling, messaging, data, and streaming services) make consumers pay for services that they are not using also the bundled nature of services limits their ability to choose telecom plans that best suit their individual needs and preferences.




Question 3: Whether the maximum validity of Special Tariff Vouchers (STVs) and Combo Vouchers (CVs) should be increased? Please Justify your response with reasons.

Presently STVs/CVs are limited due to validity restriction till 90 days (except for data STVs/CVs). Authority may consider maximum validity of special Tariff Vouchers at least 180 Days.


DIRECTOR
Indian Institute of Technology
& Entrepreneur Development
INDIA

Head Office: IICR Campus, Near Mangla Traders, Shakti Chowk, Bijnor U.P. Pincode No.- 246701, India

मुख्यालय:- आई0आई0सी0आर0 कैम्पस निकट मंगला ट्रेडर्स शक्ति चौक, बिजनौर (उ0प्र0) पिन-246701 भारत

   Mob. No. 9412118240, Phone & Fax No. 01342-265992, E-mail:- iited_mngo@rediffmail.com

Question 4: Are there specific consumer segments that would benefit from longer validity periods for Special Tariff Vouchers (STVs) and Combo Vouchers (CVs)? Please Justify along with rationale.

Longer validity periods for special tariff and combo vouchers are beneficial for telecom consumers, consumer should have an option to choose better plan according to his need.

Question 5: In the current scenario, where dealers are doing recharge of vouchers online instead of selling physical vouchers. How relevant is colour coding of physical vouchers? Please justify with reasons.

Colour coding of Physical vouchers can be continued for consumers who are purchasing physical vouchers.

Question 6: Whether colour coding can be introduced in digital mode to enhance consumer convenience and clarity? Please justify your response.

Colour coding should be introduced in digital mode also, it will bring more clarity to common telecom consumers while recharging through online mode as nowadays many consumers recharged himself.

Question 7: In the present situation where recharge of vouchers is carried out through digital mode, is there any relevance of reserving denomination of Rupees Ten and multiple there of only for Top up Vouchers. Please justify with reasons.

Top up vouchers are having processing fees and GST on total plan value. It should be continued to better understanding of common consumers.

Question 8: Whether all types of vouchers can be allowed to be offered in any denomination of the choice of service provider? Please Justify along with rationale.

Yes, all types of vouchers should be allowed on Rupees Ten and multiple thereof for better understanding of common telecom consumers.

We hope our comments will merit your kind consideration please.

Thanking you,

Yours sincerely



(Dr. R.D. Usmani)
Director

DIRECTOR
Indian Institute of Technology
& Entrepreneur Development
INDIA