

MTNL/RA/TRAI CP on printed bills to consumers/2018  
Dated 10.12.2018

To,

The Advisor (F&EA-I)  
TRAI, New Delhi

Sub. : TRAI Consultation Paper dated 15.11.2018 on “Review of extant provision for sending the printed bills to consumers of landline and Postpaid Mobile subscribers”.

TRAI issued a consultation paper on 15.11.2018 on the aforesaid subject and asked the various stakeholders to comment on the issues involved in the consultation paper. In this reference the following comments are submitted for consideration:

**Q. 1.** As per the extant provision of TTD (46th Amendment), provision of hard copy of the bill or printed copy of the bill to postpaid subscribers is mandated as a default option. Is there a need to change the extant default option, i.e., provision of paper bill without any charge to postpaid subscribers of Wire line and (ii) Mobile services? Kindly support your answer with rationale.

**MTNL COMMENTS:** In today’s world, the Information technology has become easily accessible to all human strata. Therefore the technology must be adopted and dependence upon the natural resources should be restricted, wherever feasible. Further it will also help in preservation of environmental scenario in our country.

For all the reasons mentioned under chapter 2 of the consultation paper including the reason of supporting of GoI Digitization initiatives, MTNL supports review of the regulatory mandate for providing printed bills and suggests that the default provision should be upgraded to e-bill/m-bill.

Further the final choice should be left to the subscriber, otherwise the TSPs may also issue printed bills as per their requirement depending upon customer profile, customer requirements, technical feasibility and market dynamics. The

subscriber may submit their choice to their TSP either at the time of enrolment of service, or at any other instance.

Furthermore, the regulatory mandate should be limited to necessitating the provision of printed bills, if opted so by the subscriber.

**Q. 2.** As against the existing practice of issue of printed bill to postpaid subscribers of (i) Wireline and (ii) Mobile service, unless a subscriber opts for electronic-bill (ebill), should e-bill now be made the default option? And if so, why?

**MTNL COMMENTS:** For the reasons, mentioned under Q1 above, MTNL supports that e-bill/m-bill should be default option, unless subscriber opts for printed bill or the TSP decides to provide printed bills to particular subscribers.

**Q. 3.** If e-bill is made default option then how the bills would be made available to postpaid subscribers of (i) Wireline and (ii) Mobile services with (a). Subscribers of Feature phones and (b). Subscribers who do not have e-mail facility.

**MTNL COMMENTS:** As already mentioned under the consultation the bills may be forwarded at the registered email or mobile numbers/ Apps. Further, the descriptive bill/detailed bills may be obtained by the subscribers from the respective customer care centre of TSP, if so required.

Subscribers providing their mail account can be sent “e-bill”. Sharing of complete bill information, i.e. Segment-wise usage (in case of mobile services) and details of Meter reading, other perenial charges etc. will be too complicated to provide on feature phones. This can be properly provided on “e-bill” or “hard-copy” of the bill which should be the obligation of the subscriber to take it directly from web or obtain a copy from the TSP's Customer Service Center. Otherwise the TSP may also supply the same through existing conventional modes.

**Q. 4.** If a subscriber opts for e-bill and requests for change the option to printed bills, will there be a charge for providing the printed bill? Kindly provide reasons for your answer.

**MTNL COMMENTS:** The issue may be left for forbearance and be decided by the market forces. However, as mentioned above the regulatory mandate should necessitate the issue of printed bill to the subscriber if opted so by the subscriber.

**Q. 5.** What could be the safeguards for subscribers who do not wish electronic bills and prefer to get printed bills?

**MTNL COMMENTS:** As mentioned above the regulatory mandate should necessitate the issue of printed bill to the subscriber if opted so by the subscriber.

**Q. 6.** TRAI has mandated specified set of information to be printed on bills to postpaid subscribers. If the printed bill is not issued, then how the specified set of information will be conveyed to subscribers? Should the same be mandated for e-bills also? Kindly support your comments with justification.

**MTNL COMMENTS:** Yes, the same may be mandated to be provided on the e-bill, as well as website of the TSP.

Further, in the changed scenario when the “hard-copy” is made available only against specific request, a separate mailer (physical or electronic) is suggested to keep the subscribers apprised of the various TRAI notified requirements and its related changes, on quarterly basis and only when there is some new notification from the TRAI. Each subscriber is already provided with the TRAI notified informations in the “welcome kit” and this is recommended for continuance, as it is.

**Q. 7.** Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

**MTNL COMMENTS:** No comments.

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