

Consultation On Transparency in Publishing of Tariff Offers

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

Answer: The interpretation of information about published tariff by consumer depends on the manner in which it is conveyed. Essential information about tariffs should be readily available to the consumers so that they are not misled by deceptive tariff advertising. Since mobile phones are used by users with low literacy levels, it is essential that the information be easily understandable. Therefore, it is strongly recommended that TRAI should prescribe a common format for publishing tariffs.

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.

Answers: The tariff should be published on multiple channels so that the reach is maximized. The help of design professionals should be used for designing the layout of each channel. Detailed information should be available on the TRAI webpage. The messages that will be read on phone screens by necessity have to be much more crisp and focused. The average user is only interested in limited parameters like cost per minute, cost per GB of data and cost per SMS. Service provider companies will try to come up with complicated plans to ensure loyalty. However they should all be asked to provide few basic plans which will be used by a majority of the users.

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?

Answer: Vodafone is most easy to read since all the plans are available on a single page. Jio tariffs require clicking on several pages. Same with Airtel. All TSPs have needlessly created complexity by adding the concept of validity which does not really serve much purpose.

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.

Answer: Yes, at least for basic plans, i.e. 1 month, 3 months, 6 months and one year plans.

In addition, each company can have their own customized plans also where direct comparison is not possible, such as their tie up with e-commerce companies etc.

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.

Answer: Yes, it should be mandatory for TSPs to introduce a tariff calculator tool to convey the effective cost of enrolment and continued subscription. The essential features of such a tool can be pulse rate, registration charges, taxes and any other charges.

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.

Answer: The current plans for bundled offerings are quite opaque. Companies need to be more transparent. Ambushing customers after completion of trial period is incorrect. Also including additional costs in fine print is also unfair. However, it is difficult to prescribe any rigid guidelines

for offerings since these tend to be are very dynamic. However, the teaser rates and final rates of any scheme should be spelled out very clearly at the outset.

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.

Answer: TRAI need not respond as long as the prices are within a band. If some company makes an offer that is bound to be loss making with the intention of making the competition run into heavy losses, then TRAI certainly needs to intervene. The mandate of TRAI is to protect the interest of the customer and to prevent the sector from becoming a monopoly or duopoly.

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.

Answer: Information on plans not on offer for subscription but active should be available to the public. The information regarding the opening and closing date for that particular plan should also be mentioned so that the consumers do not fight with the sales executives of the TSPs.

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?

Answer: A reasonable grace period can be allowed.

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.

Answer: To avoid confusion and maintain uniformity, TRAI can prescribe a format at least for the basic plans. However, all companies should have the freedom to offer additional plans as well.

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.

Answer: The problems are on implementation. It is preferable from the perspective of clean governance to have as few rules as possible and enforce them in letter and spirit. Too many rules will lead to legal disputes, fines etc for a multitude of minor infractions which is not desirable.

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.

Answer: The idea of consumer protection agency is good provided there is no overlap with the functions of existing organisations. The most important requirement is quick response to any alleged violations and quick resolution so that companies and the governments are not entangled in prolonged legal battles.