

Consultation Paper on Review of Telecom Consumers Protection Regulations (TCP), 2012.

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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.

Q1. It is seen that 153 Million of the Indian population lies under the senior citizen belt [1]. Out of which 5% of the people own a smart phone [2]. It must be expected that the regular data consumption will be lesser. It is also noted that regular internet users are quite low in that particular age segmentation where most of the elderly people rely on calls or face to face communication [3] rather than using internet. Moreover, the learning capability at a certain age also takes a drastic drop, hence it is recommended that unbundled offers to cater for the rising need of services from the elderly citizen [4] segment becomes utterly important.

1. <https://india.unfpa.org/en/news/indias-ageing-population-why-it-matters-more-ever#:~:text=While%20India%20has%20the%20highest,staggering%20347%20million%20by%202050.>
2. <https://www.deccanherald.com/india/karnataka/bengaluru/tangled-web-senior-citizens-navigate-a-complex-digital-world-2968208>
3. <https://www.open.edu/openlearn/mod/oucontent/view.php?id=87010§ion=4>
4. <https://www.statista.com/statistics/751005/india-share-of-internet-users-by-age-group/>

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.

Q2. Due to advent of Rich Communication Services enhanced (RCS-e), the demand of text messages have taken a toll and hence does not co-relate with the fact that they are being offered in bundled services [1]. Moreover, as mentioned in the previous question it is quite clear that a massive chunk of the demography (although growing in digitalization) lacks the digital literacy to sent and receive text messages or regularly use the internet [2]. Hence there must be a separate plan for both voice and SMS services as provided in similar demographics like Bangladesh, Malaysia and Singapore.

1. <https://www.statista.com/statistics/639902/monthly-text-messages-sent-by-network-india/>
2. <https://reveriainc.com/wp-content/uploads/2020/09/IAMAI-Digital-in-India-2019-Round-2-Report.pdf>

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

Q3. STVs and CVs have traditionally served as promotional tools within the telecom industry. While extending their validity could potentially benefit price-sensitive Indian consumers by fostering digital literacy and reducing recharge frequency, a 90-day period appears to be a sufficient duration for achieving these promotional objectives. Increasing validity beyond this timeframe could exert significant financial pressure on telecom operators due to heightened operational and deployment

costs associated with potential network congestion. Moreover, such a change could adversely impact the already low Average Revenue Per User (ARPU) in the Indian market. Therefore, maintaining the current validity period for STVs and CVs is deemed appropriate to balance promotional goals with the operational and financial sustainability of telecom providers.

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.

Q4. It is seen that there are 650 million Urban Telecom subscribers to 500 million Rural Subscribers [1] wherein 40% revenue comes from the Rural Areas and 60% from Urban [2], hence concluding that average ARPU is less in the rural areas. Hence providing STV and CV for longer duration may adhere to the low ARPU strategy and would also enhance digital inclusivity, by the virtue of which the rural population would get more exposure on premium plans and average ARPU would expect to increase. Hence it could be a good strategy to increase validity period of STV and CV in rural areas

Also, if telecom operators are not able to make return on the investment that they have put in rural areas they will pull out of those geographies hence creating pressure on govt to improve connectivity throughout India.

1. https://www.trai.gov.in/sites/default/files/PR_No.05of2024.pdf
2. <https://www.lightreading.com/digital-divide/here-s-why-indian-telcos-are-rethinking-their-rural-strategy>

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.

Q5. Colour coding, once essential for differentiating physical vouchers stacked in bundles, has lost its relevance in today's digital landscape. With the rise of online recharges through payment gateways and operator portals, user-friendly interfaces have made it easy to select specific vouchers. The advent of 4G and UPI has accelerated the shift towards digital transactions, rendering physical vouchers obsolete. Telecom companies are increasingly opting for digital vouchers to streamline operations, address inventory tracking challenges, reduce logistical complexities, and mitigate environmental concerns associated with paper-based vouchers.

Moreover, the adoption of Digital payment services and production of E-Sims have massively catered to sustainability and environmental impact and has also catered to the reduction in the inventory of telecom vendors selling voucher recharges. [1]

1. <https://inform.tmforum.org/features-and-opinion/how-to-help-end-users-make-more-sustainable-use-of-telecoms>

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

Q6. Colour coding might not be important in digital vouchers as mentioned in the above answer that User Interface on Payment system provider and Operator portal is designed in such a way it is easier to figure out what kind of vouchers are we selection even for rural or urban people where they go to

recharge stores they also use payment system provider to complete the recharge. Hence doing colour coding might be a double work for Telecom operator and payment system Providers hence incurring extra cost.

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 thereof only for Top up Vouchers. Please Justify with reasons.

Q7. Top up vouchers in denomination of 10s in digital mode might not be relevance because top up physical vouchers in denomination of 10 were introduce for customer convenience so that they and recharge outlets don't have to deal with change and top up vouchers were quite frequent in relation to special tariff vouchers and plan vouchers. Now advent of UPI and Digital ecosystem recharges are done through online mode via payment system provider and Operator portal where cash change isn't a problem hence reserving denomination of Rupees Ten and multiple thereof only for Top up Vouchers isn't relevant.

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.

Q8. Yes, any type of vouchers can be allowed to be offered in any denomination of any choice as explained in the above answer that most of the vouchers are recharged through online ecosystem through payment system provider and Operator portal, customers feel convenient to recharge with any amount instead of only denomination of 10.

Though a range can be specified by regulating body like TRAI, as to review for every telecom operator would increase the regulatory cost and that cost would eventually be borne by Tax payers which should not be encouraged.