

SN	Question	Suggestion
1	Do you foresee any requirement of regulatory intervention at this stage in tariff fixation to protect the interest of telecom service providers as well as the consumers? Please support your comments with justification.	NO. <i>Though the case is quite set up by COAI to spike data package price through TRAI regulation, the intention are clear to enhance the price of the package and profit for TSPs. From the point 2.19, that data cost per GB was in the range of Rs 4.4 to Rs 11.19 for year 18-19, and the revenue is Rs 9.45 to 15.25, there is enough profit for TSPs and the need is to fix ceiling price. Thus there is no need to fix floor price. From my experience of oil industry, we have very narrow band width for Refining and Marketing costs for all oil companies where technology and processes are quite different. In IT sector, with similar technology & operating conditions, if cost from operator to operator is so different, TRAI must set maximum cost chargeable to customer and not the floor price to ensure higher profits to TSPs.</i>
2	Do you foresee any need for change in TRAI policy of forbearance in tariffs? Please give reasons for your response.	I don't think so. However to be doubly sure, TRAI should get the cost data of TSPs audited through CAG so that price band width can be set up to protect interest of consumers. Also comparative study must be carried with other countries keeping in view PPP.
3	If the answer to Q1 is in affirmative, is fixing a floor price, i.e. a standing prohibition on TSPs not to offer services below a predetermined price level, the answer? Please give detailed reasons for your response.	Not applicable as floor price need not be set at this juncture. Also with sufficiently high revenue than the cost as indicated in 2.19, Cost and revenue data should be audited through CAG to fix maximum price limit.
4	Do you perceive a need to fix floor price despite the fact that the TSPs have increased their tariff recently? Please support your response with detailed justification.	I suspect cartelling by the TSPs as all of them unilaterally increased the prices recently. The matter may be investigated through CCI and their cost increase must be analysed through forensic Audit through CAG.
5a	What methodology should be used to fix floor price by the Authority and why? Please give detailed methodology with calculations and supporting justification.	Already said that there is no need to set floor price at this juncture. Question of methodology does not arise.
5b	If a floor price is considered, what should be the mark up over the relevant costs for arriving at a floor price? Please give detailed calculations and justification for your response.	In open market scenario, where price is driven by supply – demand position, we must give level playing field to all players. At present BSNL/MTNL are not in the same league. This needs to be corrected so that consumer will get best services at optimal price.

6	Considering that cost of delivery of telecom services is likely to be different for different TSPs, what parameters should be considered to decide floor price and why? How can it be ensured that such a floor price fixation exercise does not result in windfall profits to few TSPs? Please give your response with detailed reasoning.	As technology is similar and the customer base & operating conditions are same, cost of delivery should be in very narrow price band width for all TSPs. Moreover they should try to reduce cost through innovative ways. Here we are experiencing manipulation. TSPs are offering packages for 28 days and 84 days. (however in market it is labeled as monthly and quarterly package). That means in a year instead of 12 months, customer is paying for 13 months now. This needs to be taken up with TSPs.
7	Is there a need to fix floor price for mobile data service? If yes, can such floor price be applied uniformly to different categories of subscribers such as retail consumer, corporate, tendered or otherwise contracts, segmented and any other including one on one? If it cannot be applied uniformly, will it not result in discrimination between various categories of subscribers? Please give your answer with detailed reasons and justification.	I do recommend to fix maximum price for data services to be offered by TSPs rather than Floor price. This may vary from category to category but to be regulated on sound data, and correct calculations.
8	What should be the basis and methodology for floor tariff fixation for mobile data service? Give detailed justification and calculations for your response.	I am not recommending floor price but maximum price to be charged. This can be done after forensic analysis of the cost data provided by TSPs, since operating cost band width is too broad.
9	What should be the representative cost for fixing a floor price for mobile data service? Give detailed calculations and justification for your response.	Same as comments at 8 above.
10	Should fixation of floor price be considered for voice calls also? Please give your comments with detailed justification.	No floor price, not applicable.
11	If the answer to Q10 is affirmative, given that different technologies are being used to provide voice services (2G, 3G and 4G), what should be the methodology used to arrive at a floor price for voice services? Please give detailed calculations and justification for your response.	Not applicable.
12	Should there be any limit on TSPs to offer free offnet calls? Please explain your response with justification.	This is market driven. However please provide level playing field for BSNL/MTNL
13	If your answer to Q12 is affirmative, how should unlimited voice calls be defined? Please give your comments	Is there any need to define “Unlimited voice calls”? Be logical.

	with detailed justification.	
14	If a floor price is considered, should there be any floor price prescribed for bundled offers, including those having unlimited voice calls and data? Please give your comments with methodology and detailed justification.	In first place carry out forensic audit of cost data provided by TSPs, the band width is too broad. Then only these questions will arise.
15	If a floor price is considered, should there be a price ceiling also to safeguard consumer interest? Please give your comments with detailed justification.	With such vast variation from TSP to TSP on basic data cost per GB, we should have only maximum price ceiling.
16	If your answer to Q15 is in affirmative, what should be the methodology used for fixing a price ceiling for mobile data service, voice services and bundled offers. Please give detailed calculations and justification for your response.	Forensic analysis of cost data provided by TSPs and there comparison. Also cost data available from international players in various countries like, Brazil, China, Australia, with PPP and correction so that same can be compared and ascertained before we fix ceiling price.
17	Should all the tariff plans (retail consumer, corporate, tendered or otherwise contracts, segmented and any other including one on one) offered by the TSPs be subject to floor price tariff orders? Please give detailed justifications for your answer.	Not applicable. Not in favour of floor price.
18	How can it be ensured that all the tariff plans of TSPs (retail consumer, corporate, tendered or otherwise contracts, segmented and any other including one on one), comply with the floor tariff orders? Please give your response with detailed justification.	Not applicable. Not in favour of floor price.
19	Any other relevant issue that you would like to highlight in relation to the above issues?	Though the technology and customer base is similar, TSPs cost data shows serious variation and hence its band width is too wide. This needs to be forensically audited by expert before fixing ceiling price. Floor price is not recommended.

Other comments:

- 1) From questionnaire, it appears that, a decision is already taken for fixation of floor price. Every time we have been asked to give detailed justification for our suggestion. How is it possible to justify our formulae if no data is available? Only TSPs can justify their calculations based on what data they want to reveal.
- 2) From point 2.19 it is clear that data cost is almost 40 to 100% lower than revenue, TRAI remains a mute spectator when suddenly almost all TSPs hiked the data package prices by 15 to 40%. It appears to me that TRAI is not protecting the interest of consumers, less it would have stopped TSPs from such increase and thought about fixing ceiling price.

3) *End user is not sure about correctness of data package usage as he is unable to know exact use when he downloads data, movie, songs or interact on social media. Though in smart phone data usage do appear, it appears with the rider that actual usage may vary as TSP may be counting data differently. The methodology of data counting may be made public and smart phone manufacturers should give options to customer to select appropriate methodology so that he can keep a tap on data use.*

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