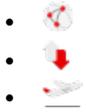


TRAI consultation paper 20/2019.

SN	Question	Remarks
1	Whether TRAI should prescribe any format for publishing tariff? Please support your answer with rationale.	Yes. It is very much required for protection of customer's right. It can be seen that TSPs published charges are monthly, but in Annexure II/III of your consultation paper 22/2019, period is mentioned as 28 days.
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.	Detailed Tariff plans as per prescribed format must be published on TSP Website-portal as well as Sales point/Retail outlets. Other modes may be used by TSP for advertisement purpose only. There is no need for separate format for various channels. If content can not be fit in SMS or USSD format, they should request prospective customers to see web-portal or visit retail outlet for more details.
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?	Many times, they do not tell customers that download speed is only for a first few GB data and then speed will reduce. As such separate format is proposed and given below at the end of questionnaire.
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.	Yes. We have noticed that TSP do not give download speed limits and in vouchers it is mentioned as 20mbps/40mbps. However this speed is limited for initial 4/5 GB data and then reduces. This needs to be stopped.
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.	If TSPs are offering certain free services for limited period, and after expiry of such period, plan being changed for subscribers for not ready to pay for those services, then Yes , such calculator is essential. Also TSPs must be asked to give their methodology of calculating data, which generally do not tally with the data usage shown by smart phone.
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	Yes. This may be needed when after expiry of mandatory period, customer is not willing to pay extra charge for those services, which makes the plan something else. However, better way is forbidding TSPs to change basic plan terms and allow subscribers to opt for not continuing additional free services without any financial burden for basic package he is interested.

	in negative, then please give reasons for not mandating such a disclosure.	
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.	Yes. TSPs must declared that apart from tariff displayed/reported, no other terms and conditions are applicable to the tariff, other than disclosed here. Also there is a need to curb fine print T&C in such brochures. This will help customers in case of breach of condition.
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.	Yes. How can it be restricted to a few plans? It has to be applicable to all plans.
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?	Yes. TSPs should update information simultaneously at retail outlets/point of sale and Web portal. However, TRAI approval is must for such changes/or changes in conditions like data package, validity period, download speed as it leads to a new package.
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.	The tariffs published on web portal and given in Annexure II/III is different. Hence it is necessary to have better monitoring by TRAI. It is therefore better to have same format and same information at both the places. If feasible, format submitted to TRAI, should only be displayed on Web-portal and at retail shops/point of sale.
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	There is no need for such unique id if TSPs are asked to link the data given to TRAI with their portal. As regard printed pamphlets or display at retail outlets/point of sale, specific approval number and TRAI link details must be given by TSPs.
12	Whether the proposed monitoring and compliance mechanism is enough to deter any violation of compliance with applicable	Without fine/penalties, no rule is complete, otherwise TSPs will get away with violations as there is no provisions. In case, violations



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499per month

📶 75GB data

📺 Amazon prime subscription for 1 year, worth ₹999

📱 Complimentary mobile insurance, worth ₹999

Benefits worths ₹ 12,497

649per month

📶 90GB data

📺 Amazon prime subscription for 1 year, worth ₹999

📱 Free iPhone Forever service, worth ₹10000

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But in Annexure II, (Voda-Idea) and Annexure III (RJIO) of consultation paper 22/2019 by TRAI put on my gov, it is mentioned 28 days. Jio has given in fine print additional conditions like high speed allowance, FUP on non Jio calls, month means 28 days, etc. Though they are technically right after publishing T&C in fine print, which generally people may not read, don't you agree that month has different connotation? Are they paying salary to the employees on 28 days cycle? **Is this called misinformation or cheating?**