



PB/VIL/18-19/005  
July 26, 2018

**Shri. Kaushal Kishore**  
**Advisor (F&EA)**  
**Telecom Regulatory Authority of India**  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg, Old Minto Road,  
New Delhi - 110 002

**Subject: Vodafone's comments to TRAI Draft 'The Telecommunication Tariff (Sixty Fourth Amendment) Order, 2018' dated 9th July 2018**

Dear Sir,

This is in reference to the above-mentioned draft regulation issued by Authority on 09.07.2018.

In this regard, please find enclosed our comments to the above-said draft Regulation.

We hope that our submissions will merit your kind consideration and support.

Thanking you,

Yours sincerely,

For **Vodafone India Limited and**  
**Vodafone Mobile Services Limited**

A handwritten signature in black ink, appearing to read 'P. Balaji', is located below the typed name.

**P. Balaji**  
**Director – Regulatory, External Affairs & CSR**

Encl: As stated above

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## Vodafone Comments to the TRAI's Draft 'The Telecommunication Tariff (Sixty Fourth Amendment) Order, 2018' dated 9<sup>th</sup> July 2018

At the outset, we are thankful to TRAI for giving an opportunity to provide comments to the Draft TTO (64<sup>th</sup> amendment).

With regard to the amendments mentioned in the draft order, we would like to submit our comments as follows:

1. On clause 3 of the draft TTO, an explicit clarification should be mentioned that it does not apply to International Roaming and ISD. Security Deposit for International roaming and ISD are generally set to contain exposure which may arise from usage and does not have linkage to monthly rental. Also, consumer desirous of availing International Roaming/ISD are aware of such security deposits and specifically opt for the same. It is important to highlight that it was always the understanding that this condition of Security deposit not more than 12 months of monthly rental, does not apply to International Roaming and ISD.
2. There are few more points which were deliberated under the Purging Committee but, has not been included. We request the Authority to kindly consider all such points for issuance of suitable amendments, highlighted as follows:

### a. Removal of Tariff Ceilings/Floor:

There is adequate competition available in market and consumers are having large choice of tariff offerings. In such environment, we request the Authority to remove tariff ceilings/floor pertaining to:

- i. Ceilings on National Roaming
- ii. Ceilings on Processing fee for Top-up voucher
- iii. Ceilings on Domestic Leased Circuits
- iv. Floor of Rs 0.50 post 100 SMS/day

### b. Flexibility and Ease of Doing Business:

We request Authority to also provide flexibility on the following issues:

- i. Electronic Bill by default (E-Bill/M-Bill/Bill over SMS)  
This has been raised with TRAI through various letters from industry associations and various steps for ensuring consumer information and availability to all segments of consumers has already been proposed by industry. While it has been mentioned in the draft TTO that this point is being looked at through a separate consultation paper, we request TRAI to kindly consider the representations made by industry association in this regard, from time to time.
- ii. Other products in MRP of Rs 10 or its Multiple:  
Considering availability and significant uptake of unlimited products, there is growing need of consumers to have other category of vouchers like Plan Vouchers, Special Tariff Voucher



and Combo Voucher, in multiple of Rs 10 MRP. The Rs 10 MRP and its multiple, provides ease to consumers, to remember a particular product and also, during the purchase. Therefore, we request the Authority to allow other category of vouchers to be provided in MRP of Rs 10 or in its multiple.

iii. Removal of Tariff publication through newspapers:

As per TRAI's direction dated 16.01.2012, it is mandatory to publish tariff plans in leading newspapers on a half-yearly basis. It has been highlighted by industry wide various representations and was also submitted by us during the purging committee deliberations that the publishing of tariff in newspapers does not serve the purpose, due to following:

- The said information in updated form, is already available on TSP's website, mobile apps and point of sales.
- Newspaper has very less recall value for giving detailed information. With generally more than 20 tariff plans in TRAI format, it is huge information occupying lot of space and also, lot of cost.
- Tariff plans list/details are dynamic, with frequent changes. Even if few consumers retains copy of newspaper, it is more likely that information in such copy is contradictory to actual list of tariff plans after some time.
- In case of such contradiction, consumer may get different benefits which are applicable on date of subscribing/recharging hence, inconvenience to subscribers leading to disputes.

The concerns were agreed during the said committee meeting, for recommending the removal of mandate pertaining to tariff plans publishing in newspaper.

We request the Authority to consider the same and amend the said Direction dated 16.01.2012 alongwith TTO amendment.

iv. Minimum tariff protection to be made equivalent to maximum validity under STV/CV:

In case of prepaid, consumers generally use STV/CVs where maximum validity which can be offered is 90 days. This 90 days period is also consistent with the 90 days lock-in period for porting the connection as prescribed under Mobile Number Portability Regulation. Also, consumers are aware of the recharge conditions post the respective validity of a STV/CV being availed by them, for discounted rates.

- v. Remove Quarterly Tariff compliance w.r.t. Bulk customers as the same has not been used for any publishing. In case the said information is required in future, same can be sought from operators on adhoc basis.

**Detailed justifications on above have been part of the deliberations during the Purging Committee meetings.**

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