

ISSUES FOR CONSULTATION

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

Yes, there is a need for a standard format for all the Telecom Service Providers (TSPs) to adhere to.

Rationales behind this standard format

- i. Control, regulate, update according to time;
 - ii. This will avoid unnecessary litigations behind service providers;
 - iii. This will also reduce multiplicity of proceedings.
 - iv. If the consumer wants any clarification or dispute over any content that can be addressed over that format itself. Any change, necessitating out of such a situation, can be addressed and directions may be given to all the other service providers to incorporate such additional data.
- 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 centres, 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.**

It is advisable to incorporate certain basic parameters in on almost all modes of communication. However, all these channels must have a **link to the primary website** containing the aforesaid format.

The specific information that TRAI wants to share along with “....*For proper information, click (the link that leads to the main site)*”.

- 3. Whether the extant format prescribed for publishing tariff at TSP’s website conveys the relevant information in a simple yet effective manner? If no, please provide the possible ways in which the same can be made more effective?**

Yes.

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. Software to be developed which would be able to successfully compare the tariffs of various service providers (TSPs).

Rationales behind this are as follows:

- i. Make it clear to the consumers which would help them to an informed consent as to their choice of service provider.
- ii. All the TSPs should put their altered, introduced or deleted plans in the specified format given in the said software.
- iii. Consumers shall be at liberty to access any data available from their end and have an informed consent in picking up the service provider.

5. Whether there is a need to mandate TSPs to introduce a tariff calculator too 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.

No, the said is to be developed from the part of TRAI which needs to be managed and updated by TRAI itself. The TSPs from their end would only be permitted to upload their respective information.

6. Whether the service providers be asked to disclose clearly the implications on 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.

No, only an update in the form of SMS, e-mail, etc. be sent to the customers in the said tariff plan, at least 15 days, 3 days and 1 day prior to the discontinuation of the said policy.

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, please provide your suggestions in detail. If you do not agree with the above requirement, please provide detailed reasons for the same.

Yes, it will be effective in case of litigations. It is the responsibility of TRAI and not always the TSP. The TSP shall inform the TRAI and any customer wishing to access information should be able to access it from the TRAI website.

Once a subscriber opts for a specific TSP, the TSP may send relevant information to the subscriber. If the subscriber wants to get any information regarding another TSP, it should be the TRAI website.

Note: in case of contingencies for example, change in the law, *vis major*, technological variations, a periodic return should be filed mentioning the change, if any.

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, software to be developed and managed by TRAI with necessary parameters recommended by experts in this regard. So that, the customer would be able to understand the reasons for discontinuation, a substituted plan, etc. the software must provide for the same.

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. It is strictly recommended specially at the time of sale.

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.

It is more often than not that the customers cannot compare between the TSPs and their services. It is highly recommended to develop software on the part of TRAI to regulate the same and give the customers a one-window solution to their queries.

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 and with support your answer with rationale.

An electronic signature certificate should be sufficient to generate the unique id of the TSPs. Parallel to this, all the consumers under each TSP be mandated for authentic and adequate regulation.

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.

No. In the absence of a strong intermediary, which needs to be formulated by TRAI the emerging problems shall only multiply leading to a continuation of productive practices prevalent in the system.

13. Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

Yes

- i. Need to develop an independent agency to develop and scrutinize the entire system, which shall be audited on a periodic basis.
- ii. Effectuate a system of security deposit from the TSPs equivalent to one year's due which will be forfeited in case of fraud and subsequently contract can be disconnected or discontinued.