

Sir,

This is in reference to consultation paper released by TRAI on 15th November 2018 regarding review of extant provision for sending the printed bills to consumers of landline and Post paid Mobile subscribers.

In this regard, considering the Demographic profile in terms of education, e-literacy, Age and affordability of Smart Phone, it is suggested that e-bill can be made default options for smart phone users.

For Non-Smart Phone users and landline users, paper bill may remain as default options. This would be a step closer towards **Hon'ble Prime Minister Narendra Modi's Digital India** initiative. Detailed comments are as follows:

1. As per the extant provision of TTO (46th Amendment), provision of hard copy of the bill or printed copy of the bill to postpaid subscribers is mandated as a default option. Is there a need to change the extant default option, i.e., provision of paper bill without any charge to postpaid subscribers of Wire line and (ii) Mobile services? Kindly support your answer with rationale.

Reply: Today there is a shift from variable billing to fixed billing. The plan offers free calling and messaging with limited data at specified data rate. Thereafter, only data speed changes and there is no change in plan charges. Also 46% of telephone subscribers are smart phone users. Changes can be implemented to effect only smart phone users.

2. As against the existing practice of issue of printed bill to postpaid subscribers of (i) Wireline and (ii) Mobile service, unless a subscriber opts for electronic-bill (e-bill), should e-bill now be made the default option? And if so, why?

Reply: Digital transactions are becoming more popular and convenient among smart phone users. As per the consultation paper, 46% of the telephone subscribers are smart phone users. Considering the popularity of digital transactions among smart phone users, e-bill should be made as default option for smart phone users unless subscribers opt for paper bill..

3. If e-bill is made default option then how the bills would be made available to Postpaid subscribers of (i) Wireline and (ii) Mobile services with (a). Subscribers of Feature phones and (b). Subscribers who do not have e-mail facility.

Reply: The change in bill delivery mode is suggested only for smart phone users. The bill delivery module of the billing system must be linked with the subscriber handset details. E-bill shall be the default option for the subscribers holding smart phones. For all other subscribers, paper bill should be the default option. The changes in status of subscriber having smart or non smart phones should be dynamic and automatic.

4. If a subscriber opts for e-bill and requests for change the option to printed bills, will there be a charge for providing the printed bill? Kindly provide reasons for your answer.

Reply: Subscriber request for paper bill should not be chargeable. However, subscriber may be educated and usage of e-bill may be promoted.

5. What could be the safeguards for subscribers who do not wish electronic bills and prefer to get printed bills?

Reply: The subscriber who have opted the printed bill, the telecom company should make sure that the bill should reach the customer well before due date. At the same time the customer should be educated and advised/ encouraged for e-billing.

6. TRAI has mandated specified set of information to be printed on bills to postpaid subscribers. If the printed bill is not issued, then how the specified set of information will be conveyed to subscribers? Should the same be mandated for e-bills also? Kindly support your comments with justification.

Reply: Specified set of information mandated for print bill must remain mandated for e-bill also. The e-bill as default option is suggested for smart phone users only who can view the image of the printed bill. Summary of the bill can be made available through message to initiate the habit of usage of the e-bill.

With Regards

Sanjay Kumar

General Manager (Wireless Infrastructure)