

**Forbes Technosys Limited Response to**  
**TRAI's Consultation Paper on**  
**USSD-based Mobile Banking Services for Financial Inclusion**

**Q1:** Do you agree that USSD is one of the most appropriate modes for mobile banking for financial inclusion? If not, which mode do you think is more appropriate? Please support your viewpoint with reasons.

**RESPONSE:** *Yes USSD can become most appropriate mode, but telecom industry should give low priority to incoming voice call when a USSD transaction is in process.*

**Q2:** Do you agree that the Mobile Banking (Quality of Service) Regulations, 2012 should be amended for mandating every TSP, acting as bearer, to facilitate not only the banks but also the agents of banks acting as the aggregation platform providers to use SMS, USSD and IVR to provide banking services to its customers? Please support your viewpoint with reasons.

**RESPONSE:** *No, Agent should have authentication on each transaction (like finger print) to avoid miss-use. Authentication is not possible in USSD*

**Q3:** Do you agree that in case of USSD transactions for mobile banking, the TSPs should collect charges from their subscribers as they do in the case of SMS based and Application (App) based mobile banking? Please support your viewpoint with reasons.

**RESPONSE:** *Yes TSPs should collect USSD usage charges like done in other modes, to avoid customer miss-use.*

**Q4:** Do you agree that the records for USSD transactions must be generated by the TSPs to provide an audit trail for amounts deducted from prepaid subscribers and bills raised to postpaid subscribers? Please support your viewpoint with reasons.

**RESPONSE:** *Yes TSPs to maintain transactions records log, to address customer grievances.*

**Q5:** Would it be appropriate to fix a ceiling of Rs. 1.50 per USSD session for mobile banking? Please support your viewpoint with reasons.

**RESPONSE:** *To carry out one USSD transaction, more than one session would be needed. Hence it is suggested to charge per transaction basis instead of per session.*

**Q6:** In case your response to Q5 is in the negative, please suggest an alternative methodology to fix a ceiling tariff for USSD session for mobile banking. You may also support your viewpoint with a fully developed model with associated assumptions, if any.

**RESPONSE:** *Rs. 1.00-2.00 for each transaction.*

**Q7:** Is there any other relevant issue which should be considered in the present consultation on the use of USSD as a bearer for mobile banking services?

**RESPONSE:** *When a customer's USSD transaction terminates abruptly, it is suggested customer should not be charged for the partial transaction. As cross-connection issues happen in voice calls, same could take place in USSD calls, hence resulting abrupt termination.*