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To,

Shri Amit Sharma,

Advisor (Finance & Economic Analysis),
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Sub: Comments on Draft Telecommunication Tariff (Sixty Sixth Amendments) Order, 2021.

With reference to draft Telecommunication Tariff (66th Amendment) Order, 2021 on "Regulatory framework for USSD-based tariff" released by TRAI on 24.11.2021. The comments from BSNL are submitted as under:

1. BSNL is providing *99# services of NPCI to our customers on chargeable basis @ Rs. 0.50 per USSD session.
2. BSNL has procured USSD platform on CAPEX + AMC basis. BSNL is incurring the costs for the USSD gateway.
3. BSNL has an agreement with NPCI, wherein no connectivity charges are levied to NPCI.
4. USSD sessions engage signalling links (voice channels) used for call set up, which involves the investment of network, infrastructure and maintenance cost etc.

The Authority intend to rationalise the USSD session charges in order to protect the interests of the USSD target user groups and to promote digital financial inclusion. Authority has taken such views from the recommendations from CDDP of RBI. Further, DFS and NPCI has also advocated to waive off the charges for USSD sessions to increase adoption among the user groups and popularity.

These Authorities while recommending the waiver of such charges has completely ignored the fact that there is certain cost to TSPs in creating this service.

In view of the the Government policy to promote and popularize the digital financial inclusion, BSNL is ready to provide the USSD services for banking transactions, free of cost to its subscribers, provided NPCI may be mandated to bear the cost of USSD sessions initiated by the subscribers so that BSNL may recover the platform cost and network cost.

Yours faithfully



06.12.2021
(Ved Prakash Verma)
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