



Telecom Regulatory Authority of India



Additional Recommendations
On
“Sale/Rent of International Roaming SIM Cards/Global Calling
Cards of foreign operators in India”

(Response to Department of Telecommunications’ Reference
dated 10th March, 2017 on the Recommendations)

New Delhi, 14th June, 2017

Mahanagar Doorsanchar Bhawan, Jawahar Lal Nehru Marg, New Delhi-110002

The Authority had received grievances from the consumers who had availed the services of Indian entities having NOC from DoT for sale/rent of International Roaming SIM cards/Global Calling cards in India. The complaints ranged from overcharging, to poor customer care to transparency in tariffs etc. In view of the foregoing, the Authority issued a letter on 19.05.2015 to all companies, who had been issued the NOC by DoT, asking them to respond to a questionnaire seeking details of type of SIM cards marketed, consumer grievance redressal mechanism etc. Out of the 38 companies listed on DoT's website as on 17.4.2015, response was received from 17 operators. After analyzing the response received from these companies and taking into account the grievances of the consumers, the Authority has finalized its suo motu Recommendation on "Sale/Rent of International Roaming SIM Cards/Global Calling Cards of foreign operators in India" in the interest of the consumer. These recommendations were forwarded by TRAI to DoT on 09.05.2016 (copy attached).

2. Notwithstanding the above, the Authority also decided to conduct a customer response survey with a view to examine the complaints and identify the measures that can be adopted to improve the end user experience of the Global Cards/ International SIM cards. As per the information available on DoT's website as on 30.06.2016, DoT has issued NOC to **47** Companies for issuing Global Cards/International SIM cards. As part of the survey, letters sent to all the 47 companies listed on DoT's website on 27.08.2016 seeking the number of SIMs rented/sold from 01.01.2016 to 30.06.2016. The response received by TRAI was as follows:

(a) Responded	: 15
(b) Did not respond	: 23
(c) Letters couldn't be delivered	: 09

List of Companies which did not respond:

S.No.	Name of the Company
1	M/s Lyca Telecom Pvt. Ltd
2	M/s Global SIM Pvt Ltd
3	M/s Birds Telebyte Pvt Ltd
4	M/s GO Talk Mobiles Private Ltd
5	M/s 360 Global Mobiles Pvt. Ltd
6	M/s Medinyx Software Solution Pvt Ltd
7	M/s Supama Forex Pvt Ltd
8	M/s Friscon Telecom Pvt Ltd
9	M/s Seven Telecom Pvt. Ltd
10	M/s Earthroam Pvt. Ltd
11	M/s Trump Tele Ventures Pvt. Ltd
12	M/s Tsim Communications Services Pvt. Ltd

13	M/s Peak Mobiles India Pvt Ltd
14	M/s Roam Free Cellular Pvt Ltd.
15	M/s Three Spark Telecommunications Pvt Ltd
16	M/s Ksquare Telecom Pvt Ltd
17	M/s Muni's Telekom Pvt Ltd
18	M/s Rajeshwari Communication Infra Private Limited
19	M/s Inext Connect Private Limited
20	M/s Sawasdee IT Solutions India Private Ltd
21	M/s Wave Date Systems Pvt. Ltd
22	M/s D-TEL Cellular Services Pvt. Ltd
23	M/s Way2SMS International Pvt. Ltd.

List of Companies whom letters could not be delivered due to incorrect address:

S.No.	Name of the Company
1	M/s Roam1 Telecom Limited
2	M/s Value Roam Telecast Pvt Ltd
3	M/s SNSGAP International Services Pvt Ltd
4	M/s Viva Communications Pvt. Ltd
5	M/s Stay Connect Cellular Services Pvt Ltd.
6	M/s Touchpoint Services Pvt Ltd.
7	M/s Reliance Webstore Limited
8	M/s Golbus Roamaing Services Pvt Ltd
9	M/s Interface Destination Pvt Ltd

Data pertaining to **15** Service providers who responded is as mentioned below:

Ser No	Service Provider	No of International SIM cards sold/rented from 01 Jan 2016 to 30 June 2016
1	Matrix Cellular	3,49,466
2	Uniconnect SIM Pvt Ltd	1,79,153
3	Clay Telecom	42,707
4	One World Tele Services	7,813
5	Jaxter	1,150
6	Aryan	358
7	GG Telecrest	217
8	Talk More	153
9	Travel Global	129
10	Sonera	58
11	Telecrest Cellular Services Pvt Ltd	31
12	Aryatech Communications	14
13	Lebara Mobile	0
14	Global Hello	0
15	Hitmax Industries Pvt Ltd	0

As per the data provided by the service providers, approximately 98% were International SIM cards while 2% were Global Data Cards.

3. Based on the above mentioned data provided by the Service Providers, a SMS based survey was conducted by TRAI in **December, 2016** through NIC. Following data was sought through the SMS for the International SIM card and Global Calling Card:

- i. Reply 1 if SIM card WORKED FULLY.
- ii. Reply 2 if SIM card WORKED PARTIALLY
- iii. Reply 3 if SIM card DID NOT WORK AT ALL.

4. Response of the survey conducted on above attributes is as mentioned below:

Service Provider	Worked Fully	Worked Partially	Did not work at All	Total
Matrix Cellular	5773	3498	2054	11,325
Uniconnect SIM Pvt Ltd	1111	509	505	2,125
Clay Telecom	971	735	628	2,334
One World Tele Services	64	41	13	118
Jaxter	43	55	25	123
Merchant	7	9	5	21
GG Telecrest	6	3	0	9
Talk More	4	4	1	9
Suntel	3	0	0	3
Aryatech Communications	0	1	0	1

5. It was inferred from the survey that almost 50% of the users were found to be unsatisfied with the services of the International SIM cards/ Global Calling cards. On further analysis of the data, it was found that the numbers of complaints were pre-dominantly more in case of International SIM cards but the customer satisfaction was equally poor in case of Global Data cards.

6. A meeting was held on 06 March 2017 at TRAI attended by seven out of the nine service providers, chaired by Secretary, TRAI. Response received from the SMS based survey by TRAI was discussed with an intent to identify the reasons of poor customer experience of services and the measures that can be adopted to improve the services. On the request of the service providers, SMS responses received by TRAI were shared with the respective service providers. The Service Providers were asked to analyze the response of each customer and furnish the following details:-

- (a) Country wise failure report of the response received.
- (b) Tariff related issues and the refunds given to the customers along with the details.
- (c) Steps taken to improve the services.

7. Responses from Service providers have been received, it has been found that out of the 33 countries where the cards were used, maximum complaints were with regard to the following Countries:-

- (a) UK : 975 cards
- (b) USA : 713 cards
- (c) Singapore : 239 Cards
- (d) Global SIM cards : 208
- (e) UAE/Dubai : 190 cards
- (f) Thailand : 171 cards

8. Most of the service providers have attributed the poor customer response to the following:

- (a) Issues related to incompatibility of Handsets.
- (b) Lack of awareness of the users to execute the correct APN (Access Point Name) Settings; these settings are essential setting up a connection to the gateway between the cellular network and the public Internet.
- (c) Non availability of tools to check the network coverage in advance as per the travel itinerary of the user.
- (d) Lack of awareness amongst the users about the specific calling methods in few countries where budget prefix is to be used.
- (e) Instantaneous activation of data connectivity without the knowledge of the user upon landing at the country being visited, and consumption of data inadvertently by pop-ups and advertisements.

9. In view of above analysis, the Authority recommends that :

(a) No Objection Certificate (NOC) issued to 23 Companies/Service providers who did not respond to the letter issued by TRAI on 27 August, 2016 be processed for cancellation. Also, actions may be initiated against the nine firms who have changed their address and have not intimated the same to DoT (Refer Para 2).

(b) For making an informed decision before a customer purchases a calling card/International SIM it is recommended that each service provider should have a portal with the following features:

- i. **Graphical User Interface (GUI) for the customers to see the network coverage of International SIM cards and Global cards being offered by the service providers.**
- ii. **Customer complaints monitoring system (CCMS): Besides the Service Providers Website, Real time feed of the CCMS should be made available on the websites of DoT so that monitoring of complaints lodged and time bound redressals given can be viewed by the customers and DoT, as per following frame-work:**

S. No	Nature of Complaint	Max time duration for redressal
(a)	Non Activation of Services (Call/Data or both)	With-in 2 hours of lodging of complaints.
(b)	High billing/Over billing	With-in five working days from the date of lodging of complaint.

- iii. **Escalation Matrix with functional mobile numbers and email address of senior executives and officers should be provided to the customer along with the Card being bought so that he can approach them in case of difficulty.**
 - iv. **The CCMS should have a feature where in the customer after returning from his international visit is able to give feedback and obtain refunds if any from the service provider.**
- (c) Purchase of Global Calling cards/International SIM cards be done though digital mode only i.e. Net Banking, Credit cards, Debit cards, e-Wallets. Following details are recommended to be captured in respect of each customer:**

- i. **Bank A/c details**
- ii. **Aadhar Card**
- iii. **PAN card**

(d) In addition to the provision listed at point 7 of the Circular No 808-02/2014-CS-I dated 05 August, 2014 issued by DoT for levying of a penalty of Rs.500/- (Rupees Five Hundred) per hour for delay in activation of SIM/calling card beyond the time limit mentioned for activation of such cards in India; To compensate the customer, it is

recommended that in case the customer reports non activation of services, no usage of the card for reasons beyond the control of the customer like poor network coverage, in-compatibility of handsets etc, the service provider, in case of Prepaid Card customer would refund the entire amount paid by the customer to the service provider. In addition, service provider should pay a penalty of Rs.5000/- (Rupees Five Thousand) to the customer as compensation for the inconvenience and incidental charges. In case of the Post-paid card customer also the service provider should pay the similar penalty of Rs.5000/- (Rupees Five Thousand). In both the cases, the remittance of penalty and refund as applicable should be completed within Fifteen days of his/her return and reporting of non usage by the customer. Service provider before refunding the amount would ascertain the non usage of the card and the details of the same would be shared with the customer.

(e) For early settlement of complaint, an Appellate Authority consisting of representatives from the Service provider and DoT be instituted. It may be made mandatory for the service providers to inform the users about the grievance redressal mechanism in case they find the services to be unsatisfactory. In case it is found that there are complaints of non working of cards are more than 10% of the total number of cards sold monthly by the service provider, then the NOC of the service provider be cancelled.

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