



To,
The Advisor (F & E A-I),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg New Delhi – 110002

Kind attention: Shri Kaushal Kishore, Advisor (F & EA-I)

No: BSNLCO-RGLN/25/3/2020-REGLN/ dated: 07-07-2020

Sub: Comments on TRAI consultation paper on Regulation of International Mobile Roaming Services

Sir,

Kindly refer to the TRAI consultation paper on Regulation of International Mobile Roaming Services issued on 26-05-2020. In this context, question-wise BSNL's response is as under:

Question 1: Should not the IMR service remain inactive at the time of issue of the sim till the same is activated by the subscriber as a part of the IMR tariff-selection exercise? Please elaborate your submissions.

BSNL Response:

BSNL is already implementing it. New SIM cards are issued with inactive IMR Service. BSNL is providing International Roaming facility to its Post-paid Customers after getting request from them to provide International Roaming. In case of Pre-paid Customers, a recharge voucher is required to activate the International Roaming specifically after getting their SIM card replaced at CSC of BSNL.

Question 2: Should it not be mandatory to communicate the details of activation and applicable tariff immediately by SMS or email on completion of the tariff-selection exercise by the subscriber? Please give your views.

BSNL Response: Whenever customer is getting its IMR activated, he has been told by CSC person to visit our website www.ir.bsnl.co.in . In addition to that following SMS being sent to such customers from time to time:

“Dear Customer, kindly visit our website www.ir.bsnl.co.in for international roaming tariff & more details”

As regard making it mandatory to send the applicable tariff on SMS & email, BSNL feels this is not feasible presently in BSNL as activation of IMR service is not allowing BSNL about the destination of the Roamer. IMR services are being activated irrespective of destination. A mechanism can be explored wherein the customer may send the SMS to a predefined number with place of visit so that short details of tariff may be sent.

Question 3: Should not the tariff details and related terms and conditions be communicated to subscribers of IMR service by SMS and /or email as soon as the phone is switched on in the visiting country by the subscriber. Please elaborate your views.

BSNL Response: Yes, this may be feasible. BSNL is in final stage of commissioning of ‘Welcome server’ and above feature would be possible based on LU of the customer in the foreign destination.

Question 4: Please give your views on the significant differences in tariffs for IMR Service under Standard Rates and IR Packs. Furthermore, your views are solicited as to how these two rates can be rationalized.

BSNL Response: This difference is not that much significant in case of BSNL, as BSNL is passing its lower rates finalized with roaming partner to its customers transparently with some of its mark up. Moreover, BSNL has launched IR packs to its Pre-paid customers in very few countries. The Packs are mainly designed to allow customers for controlled spending during roaming.

There is no significant difference between tariff of IR packs and Standard rates of BSNL, but the significant differences in tariffs for IMR Service under Standard Rates and IR Packs, if exist is required to be maintained otherwise nobody will subscribe the IR pack. The customer is paying upfront for the discounted tariff in IR packs. Also, the customer may or may not be able to use whole freebies of the IR pack. This justifies the significant differences in tariffs for IMR Service under Standard Rates and IR Packs and its viability.

Question 5: Should not the IR packs apply automatically the moment subscriber's expenses on IMR Services exceed the corresponding daily IR Pack rate unconditionally for all the countries for which the service provider is offering IR Packs?

BSNL Response: In addition to submission in response to Question 4, it is submitted that the same can be explored once a significant number of IR pack are available for customers and a significant difference established in standard rates & IR pack rates.

Any STV subscribed for domestic use or IR pack for International use, the customer pays upfront, whether they use the subscribed STV/IR pack or not. Due to this upfront payment, customer gets freebies in volume or discounted tariff or both for defined period only. Also, there is "pay as you use" facility with base tariff. The customer decides to subscribe or not to subscribe an IR pack depending on the estimated usage. The IR pack or "pay as you use" option is exercised by customer and both can't be merged by BSNL. This will kill the basic purpose of IR packs/STVs.

Question 6: Can IR Packs presently offered for one day duration be used to subscribe for multiple days to avail IMR Service? Whether the TSPs be mandated to permit combination of different IR plans as per requirement of the consumer? Please elaborate your submissions.

BSNL Response: Presently it is not being offered. However it can be done.

Moreover, in the interest of customers, it should be mandated to provide a flexible IR Package in which customer can choose any number of days as the validity of the package.

Question 7: Why should not the IMR tariff be counted in 24-hour format on the first use of data, making or receiving a call or sending a text message and renewing the charges for only those 24-hour periods in which the services have been used rather than on calendar day basis? Please elaborate your submissions.

BSNL Response: At present this facility is not feasible in BSNL. However the suggestion is in the interest of the customer and its feasibility can be explored.

Question 8: In consumer interest why it should not be mandated for the service providers to send updates in respect of the data usage exceeding certain pre-established milestones such as 50%, 80%, 90% and 100% of the data entitlement? Please give your views.

BSNL Response: Yes, It may be mandated. BSNL is following this practice. SMS are being sent to customers on data usage of 50%, 90% and 100% of their prescribed limit. On reaching 100% service, barring message is being sent to the customer along with process to reactivate the service.

Question 9: Will it not be advisable to mandate the TSPs to inform the subscriber by SMS every time the subscriber lands in a country/area not covered by the IR Pack subscribed, of the fact of roaming in an uncovered zone, and the tariffs applicable thereto? Would the aforesaid requirement suffice or whether alongside this, the TSPs be mandated to keep the mobile data in the inactive mode and activate only in accordance with the directions of the subscriber? Are there any other measures that can be taken to cover the situation as detailed?

BSNL Response: All the IR packs are designed for specific country / operator wise only and it will not work in other territory.

The subscriber can be informed on landing at uncovered zone/country. This may be done through welcome server and SMS can be send with main tariffs. Activation of data on demand of Subscriber during Roaming can be explored but it may take its processing time and lead to customer dissatisfaction due to any delay in completion of request. BSNL suggest to keep following SMS to customer on landing on country/zone not covered by the IR package:

“Dear Customer, the data charges on IR is very high. Take informed decision to use data while roaming abroad as smart phone consumes data for auto updates without knowledge. You can disable data roaming in your handset to avoid excess billing.”

“Dear Customer you are advised to deactivate the data services in International Roaming as Data Tariff during International Roaming is very high as compared to tariff during National Roaming.”

Question 10: What are your views on the measures suggested in para 3.21 to protect the consumer from bill shocks dues to usage of services beyond the pack entitlements? Please provide your views on each of the above measure and suggest additional measures, which in your opinion can be helpful in addressing the issue.

BSNL Response: In case of BSNL, this doesn't matter very much as there is not a major difference in IR pack rates & Standard rates. BSNL's comments on 3.21 are as follows:

- a) Agreed, the services can be blocked and can be reactivated on customer's request through any agreed means.
- b) A pre-agreed amount can be given by customer which can be allowed after IR pack, however the same needs to be check with implementation team.
- c) Another minimum day pack can be activated after consent of customer.

Presently BSNL is offering limited number of IR packs for limited number of countries with no significant difference in IR pack rates & Standard rates. However, amount of freebies used and freebies remaining or validity of IR pack remaining may be communicated to customers, if technically feasible.

Question 11: Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

BSNL Response: No comments.

The above comments from BSNL may be considered please.

Yours sincerely



(Ved Prakash Verma)

DGM (Regln-II)