

Email**Mr Kaushal Kishore**

VOICE Comments on TRAI consultation on "Validity period of Tariff Offers"

From : hupadhyay@consumer-voice.org Sat, Jun 12, 2021 03:20 PM
Subject : VOICE Comments on TRAI consultation on "Validity period of Tariff Offers"
To : Mr Kaushal Kishore <advfea1@traf.gov.in>
Cc : sriramkhanna@yahoo.co.in, coo@consumer-voice.org

To,

Shri Kaushal Kishore, Advisor (Finance & Economic Analysis-I),

Telecom Regulatory Authority of India,**Mahanagar Door Sanchar Bhawan (Opp. Ram Lila Gr.),****J.L.N. Marg, NEW DELHI – 110 002**advfea1@traf.gov.in**Dear Sir,****Subject: VOICE Comments on TRAI consultation on "Validity period of Tariff Offers"**

We at VOICE as part of our advocacy initiative in Telecommunications continuously raise different issues with Policy makers impacting consumers based on the knowledge through Consumer feedbacks.

As registered CAG with TRAI we are in forefront of providing inputs to TRAI related to consumer concerns and interests.

In continuation of this effort on behalf of telecom consumers we at VOICE have following response to the questions posed in the consultation paper:

Question 1: Whether TRAI should intervene in the issue of validity period or allow the same to be under forbearance?

TRAI should continue the issue of validity period to be under forbearance but define and standardize it.

Question 2: If the answer to the Question 1 is yes, then whether the TSPs be mandated or merely advised to offer tariff (for PVs, STVs and CVs) for a specified duration?

Offer durations should be defined and standardized by TRAI for all Service Providers (SPs).

Question 3: Whether the period to be specified should be considered as 30 days or a month with requirement of tariff to be renewed only on the same date of each month or separate tariff offers be mandated for 29/30/31 days in addition to the present practice of offering tariff for 28 days?

Periods should be standardized to say 1 Day / 7 Days / 15 Days AND 1 Month.

All other periods should be invalid. 1 Month validity should mean renewal due on the same date of the following month.

Question 4: Whether on the lines of a monthly offering, the other periods viz., quarterly, half-yearly and yearly prepaid tariff offerings be mandated or just the monthly offerings be required?

Yes, quarterly meaning 3 months; half-yearly meaning 6 months; and annual meaning 1 year may be advised but no concept of no. of days.

Question 5: If there are any other issues/suggestions relevant to the subject, stakeholders are invited to submit the same with proper explanation and justification.

This standardisation is necessary to ensure no mis-selling is done by SPs. If we allow the concept of 28/30 days etc., it is quite possible SPs selling a strictly monthly plan today can modify the validity days to 28/30 days tomorrow and it may still be called a monthly plan thereby effecting an indirect price increase. For data plans it is even more damaging for the lay consumers.

We have been emphasising repeatedly to utilize CAGs in consumer centric activities of TSPs including billing, tariffs, consumer complaints etc. TRAI did make an initial effort in involving CAGs in Appellate committees but it should not have stopped at that. CAGs have gained vast experience while continuously interacting with consumers on a day-to-day basis, being member of Appellate committees for 3-4 years have added to this experience and they now better appreciate the SPs side. One does realise that TRAI cannot directly interact with consumers, almost 100 crores of them, CAGs should be the automatic choice of reach. At the same time putting CAGs' vast skills, reach and expertise to good use has to be ensured actively by TRAI. We suggest CAGs role should be formalized beyond Appellate committees, by creating a Umbrella Appeals Committee (UAC) to analyse and report consumer issues/complaints on a quarterly basis. UAC can also be entrusted with quarterly audits (peer audit), look at industry best practices and initiate standardisation of redressal systems. This UAC may consist of all TSP representatives and 2-3 CAGs at circle level and similar set-up at national level.

Yours' Sincerely

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Hemant Upadhyay
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