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Comments on the Consultation Paper on Tariff issues of Telecom Services..

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Subject : Comments on the Consultation
Paper on Tariff issues of Telecom
Services..

To : advfea2@traf.gov.in, Joint Advisor
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Dated at Palakkad/ Kerala the 27th day of January 2020.

From

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To

Shri. Amit Sharma ,
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Sub ; Comments on the Consultation Paper on Tariff issues of Telecom Services..

Sir,

Let me congratulate you to sending the Consultation Paper on Tariff issues of Telecom Services by post and thank you for the same . I have received the same day before yesterday , after coming back from Rameswaram .. The delay incurred in connection with submitting the comments if any may please be condoned .

Our comments as follows:

Q.1. Do you foresee any requirement of Regulatory intervention at this stage.....

Answer : Yes. The intervention is most essential. Because TSP's does not have any uniform plan . All are providing plans according to their strategy to get more business by confusing the Customers .

Q.2. Do you foresee any need for change in TRAI policy of forbearance in Tariffs?.....

Answer : For pre-paid customers different plans by different Operators. **No consistency.**

Q.3. If the answer to question No.1 is in affirmative , is fixing a floor price

Answer : According to us the Floor price will be nominal but at the same time data Speed should be consistent .

Q.4. Do you perceive a need to fix Floor price despite the fact that, the TSP's.....

Answer : There is no justification to increase their Tariff without giving any chance to the Customers. And also the Customers community are in dark . They are forced to continue even suffering huge loss.

Q.5 (a) What methodology should be used to fix floor price by the authority and why ?.....

Answer: Multiple types of plans should be avoided . Common customers not at all aware and it is not customer friendly.

Q.5 (b). If the floor price is considered what should be the mark up over the relevant cost for arriving at a floor price ?.....

Answer : It should be based on the consumption. Customers are different in groups with their income and profession. So floor price can be considered according to the consumption of the individual. For. Example : Electricity and water bills are based on their consumption. Un limited means there is no limit. So customers are forcefully using wanted or unwanted needs.

Q.6. Considering that, cost of delivery of Telecom services is likely to be different for different TSP's. what parameters should be considered to decide floor price and why ?.....

Answer : Small consumption plans Customers need not have a floor price. Floor price can be fixed annual and half yearly plans .

Q.7. Is there a need to fix floor price for mobile data services ..?.....

Answer : Yes . It can be applied uniformly to the higher usage groups / Corporate customers. Just think about the billing system of Electricity and water . If consumption is very high ;payment also very high.. What is there in discrimination . Make it Slabs system.

Q.8. What should be the basis and methodology for floor tariff fixation for mobile data services ?..... ?

Answer : Depending up on the consumption by ensuring data speed & consistency.

Q.9. What should be the representative cost for fixing a floor price for mobile data service ..?

Answer.: Depending up on the consumption . First priority should be given data speed consistency.

Q.10. Should fixation of floor price be considered for voice call also.....?

Answer.. Yes.

Q.11. If the answer to q.10 is affirmative give that different technologies.....?

Answer : Almost 2G & 3G services are outdated now.. 4G Price may be fixed reasonably .

Q.12. Should there be any limit on TSP's to offer free offnet calls?.....

Answer. Yes. Rate should be fixed.

Q.13. If your answer to Q 12 is affirmative ,how should unlimited voice calls be defined..?...

Answer: It should also be limited.

Q.14. If floor price is considered.....

Answer : should also be limited.

Q.15. If a floor price is considered should there be a price sealing.....?

Answer: Yes. Nominal amount may fixed as floor price.

Q.16. If your answer to q.15 is in affirmative?

Answer : Make it one Month or 2 Month also used as unit price..

Q.17. Should all the tariff plans (Retail, corporate, tendered or otherwise contracts ..) etc...

Answer: Exempt the ordinary usage customers..

Q.18. How can it be ensured that all the Tariff plans of TSP's ?

Answer : The Authority – TRAI should make Regulation against those violators and punishments also be incorporated...

Q.19. Any other relevant issue that.. you.....?

Answer : In the comparative chart showing pre & post hike Tariff in page no. 38 to 40 given TSP's different plans for 28 days , 84 days and 365 days etc.. It should be brought under in one Month (30 days) 3 Month(90 days) One year (365 days) So the customers can be easily recognized / remembered their package for recharge .. Also uniformity needed. Here some one have 56 days package some does not have such packages..

Government has to provide Financial concessions to promote and support the TSP's ..

Thank you

Yours faithfully,

Adv. Surendran PA, CAG from Kerala , & General Secretary Consumers Association..