

7th July, 2020

To
Shri Kaushal Kishore,
Advisor (F & EA-I),
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi – 110002

Subject: DUG response on Consultation Paper on Regulation of International Mobile Roaming Services

Dear Sir,

In our view the bill shock issue can surface mostly in Post-paid (as bills are received after some time and may have unexpected charges in case of IMR) and it is mainly due to data use. There should be a cap on data usage and forewarning from TSP be sent by SMS in advance when the cap is approaching.

Hence in our view, it will be sufficient that IMR is not made active by default when a post-paid SIM is issued. Further, even if a subscriber has activated roaming on Standard Rates, his data roaming service should be activated once he opts in.

In case of prepaid, IMR can be activated at the time of issue of SIM.

We understand that the Standard rates and IR packs are two different constructs and have different commercial / relevance use. To avoid Bill Shock some customers when they go abroad and have WiFi or foreign connection then they never use Indian SIM for data or Voice. At best it will be used for SMS / Banking OTP received for which they take a Standard Rate. There are so many Indians who live in the USA/UK who have taken prepaid Indian cards only for the purpose of SMS from the Bank since their Indian number is registered there. Same example applies to a family touring a foreign country. All members will not subscribe to IR Packs but will be happy with Standard Rates for SMS and data roaming will be deactivated.

We agree with ITU IMR Guidelines that ***“fair and transparent pricing of IMR services and ensure that consumers are paying for only the services used”***

We are in agreement with TRAI that consumer communication as mentioned is needed and that is being done as standard practice and there is no need to mandate the same.



Anil Prakash
President, DUG