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**Dated:** 07 July, 2020

**To,**  
**Shri Kaushal Kishore,**  
Advisor (F & EA-I)  
Telecom Regulatory Authority of India (TRAI),  
Mahanagar Door Sanchar Bhawan, J.L. Nehru Marg,  
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New Delhi - 110002, India  
Email: [advfea1@traigov.in](mailto:advfea1@traigov.in)

**Subject:** Consultation on *Regulation of International Mobile Roaming Services*

**Ref:** Consultation Paper No: 5 of 2020, dated 26 May, 2020

Dear Sir,

This is with reference to the consultation paper on '*Regulation of International Mobile Roaming Services*'.

Please find attached GSMA's comments on this consultation as **Annexure-1** to this letter. We hope that our response will merit your kind consideration.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Manoj Kr Misra", is written over a horizontal line.

(Manoj Kr Misra)  
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Enclosed: As above (*Annexure-1, total number of pages in annexure 02*).



## Regulation of International Mobile Roaming Services

### Annexure -1

The GSMA is pleased to submit its very high-level comments on the public consultation on 'Regulation of International Mobile Roaming Services'. These comments are based on our global industry position on International Mobile Roaming.

#### **Introduction:**

International mobile roaming (IMR) allows people to continue to use their mobile device to make and receive voice calls, send text messages and email, and use the internet while abroad.

The mobile industry is committed to customer protection. Operators continue to improve transparency to ensure consumers receive better value from their roaming services. Easy access to personalised tariff and usage information allows consumers to quickly understand the range of options available in the market. Operators use several methods to ensure consumers are aware of the latest rates and offers, such as consumer-friendly websites and SMS messages welcoming roaming customers when they enter a country.

We note that many operators across the India, particularly for the prepaid segment, offer customers the ability to top up with local cards while travelling abroad. This, in addition to easily accessible, free-of-charge customer support, gives prepaid customers the freedom to fully understand their roaming options and top up their credit at home or abroad.

We note that in past, the Telecoms regulators and policymakers have raised concerns about the level of IMR prices and the lack of price transparency, which can cause consumer bill shock.

It is also noted that in December 2012, during the revision by the International Telecommunication Union (ITU) of the International Telecommunications Regulations (ITRs), several governments requested that the revised treaty include provisions on transparency and price regulation for mobile roaming. However, on balance, ITU member states concluded that roaming prices should be determined through competition rather than regulation, and text was included in the treaty to reflect this approach.

The mobile industry is a highly competitive and maturing industry, and one of the most dynamic sectors globally. In the past decade, competition between mobile operators has yielded rapid innovation, lower prices and a wide choice of packages and services for consumers. Imposing roaming regulation on mobile operators not only reduces revenue and increases costs, but it deters investment.

Furthermore, the competition from OTTs, Calling Cards, and now WiFi are also on the rise. **Therefore, we do not see that Mobile Roaming is akin to a monopoly service anymore.** In fact when public Wi-Fi hotspots are rising globally, the roaming using SIM is a matter of consumer choice.



## Regulation of International Mobile Roaming Services

### **GSMA's recommendations cum comments:**

In view of above facts and developments in the mobile industry, we would like to share a three-phased strategy<sup>1</sup> to address the concerns raised in the consultation paper. Accordingly, a very high level comments are summarized below;

- In the case of transparency<sup>2</sup>: In June 2012, the GSMA launched the Mobile Data Roaming Transparency Scheme, a voluntary commitment by mobile operators to give consumers greater visibility of roaming charges and usage of mobile data services when abroad.
- We note that in India there are sufficient competitive constraints in the IMR services and it does not require any price regulation. The MNOs already have safeguards (e.g. spend limits, SMS to users when roaming) in place to address consumer concerns.
- **In view of the above, we believe that there is no need to regulate the IMR services than what is already in practice. The Hon'ble Authority may continue monitoring market developments and based on evidence and analysis take appropriate measures in future. Any particular issue identified through this consultation should be discussed with the industry, and identify a solution that is least financially disruptive, encourages self-regulation, makes consumer more aware and ensure the sustainable & orderly growth of the mobile industry.**

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<sup>1</sup> [https://www.gsma.com/publicpolicy/mobilepolicyhandbook/wp-content/uploads/2019/01/MPH7\\_ENG\\_web\\_spreads.pdf](https://www.gsma.com/publicpolicy/mobilepolicyhandbook/wp-content/uploads/2019/01/MPH7_ENG_web_spreads.pdf) (Page Number 92-93)

<sup>2</sup> <https://www.gsma.com/publicpolicy/regulatory-environment/roaming>