

Date: 9th June 2021

To
Shri Kaushal Kishore
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Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi – 110002

Subject: Comments on the Consultation Paper on Validity period of Tariff Offers (Consultation Paper No. 02/2021)

Dear Sir,

Thanks for giving us the opportunity to comment on the Consultation Paper on Validity period of Tariff Offers. Kindly see our comments below. We hope that this will be helpful.

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

Reply: Yes, TRAI should intervene.

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?

Reply: TSPs should be mandated to offer tariff (for PVs, STVs and CVs) for a specified duration.

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?

Reply: The period should be a month with requirement of tariff to be renewed only on the same date of each month.

It becomes difficult to track the validity of the current data packs of 28/56/84 days in the middle of the periods. It is difficult to recall the exact date of recharge from the previous SMS or receipts. The TSPs keeps on sending SMS before the end of the validity pack and sometimes, they just mention that it will expire soon and sometimes the specific dates. Hence, for a customer it becomes difficult to check whether the claim of the TSPs via SMS is correct or not. Secondly, mostly for the elderly people and for persons who are not text savvy, there is evidence that by mistake they had made additional recharge before the end of the current validity pack, and they may be misguided by the normal mobile when they go for recharge. This will result in a loss of money for the customers. Moreover, receiving multiple SMS from the TSPs often is irritating.

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?

Reply: Other periods viz., quarterly, half-yearly and yearly prepaid tariff offerings should be mandated.

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.

Reply: TRAI should ensure that the quality of the network provided by the TSPs is good, e.g. speed/signal strength of the internet connection as well as the quality of the voice calls.

In this regard, I request TRAI to address the following additional points:

- a. How should the TSPs compensate the customers if the signal strength is low (poor network)? How should it be checked and thereby reported by the customers? In every places, there should a watchdog to check the quality of the network and the penalty to be imposed if the minimum threshold in normal circumstances is not maintained.
- b. It has been observed that in some parts of the country say region R1 the signal strength of say TSP A is very good and that of TSP B is very low, however, in region R2 say it is reversed, i.e. the signal strength of say TSP B is very good and that of TSP A is very low. Is it then a collusive behaviour/market sharing agreement, such that in Region 1 TSP A will dominate (will have more customers) and in Region 2 TSP B will dominate? This should be investigated properly if the market shares are highly biased over periods by the Competition Commission of India and TRAI jointly.
- c. For avoiding price discriminations, the tariff rate and the duration of the specific offer should be the same within India (across all states excluding the indirect taxes if the tax rates differ) and it should be reported on the websites of the TSPs in pdfs, otherwise the pricing policy may differ zone wise in terms of the zone of the mobile numbers registered. This will lead to a situation such that all the people of say Chennai and Delhi are aware of what prices they all are paying. Normally, it is not possible for a person to check the prices across regions and the prices paid by different persons of the same regions. This will lead to added pressure on the TSPs to provide a good network and the spirit of the proper PRICE Competition ensues.

Thanking you

Regards,

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