



**COMMENTS BY PURSUITEX ADVISORY SERVICES, LLP ON
TRAI CONSULTATION PAPER ON INTERNATIONAL MOBILE ROAMING SERVICES
(CP NO.5/2020)**

Sub:- Consultation Paper on Regulation of International Mobile Roaming Services

At the outset, we thank the Authority in providing us an opportunity to give our comments on this very pertinent issue impacting the end customer significantly from both monetary and mentally. The answer to questions posed in the Consultation Paper is furnished against each question.

Question 1: Should not the IMR service remain inactive at the time of issue of the sim till the same is activated by the subscriber as a part of the IMR tariff-selection exercise? Please elaborate your submissions.

Ans. We are of the view that the IMR service should remain inactive until the same is being activated by customer itself based on selection of IMR tariff package / top up. This mechanism will ensure that activation of IMR service and applicable tariff for the same is in the knowledge of the customer.

Question 2: Should it not be mandatory to communicate the details of activation and applicable tariff immediately by SMS or email on completion of the tariff-selection exercise by the subscriber? Please give your views.

Ans. Yes, we fully endorse the TRAI view point that it should be made mandatory to communicate the details of activation and applicable tariff to subscriber immediately on tariff-selection.

However, it is already being ensured by the TSPs that customer is being duly communicated through TSP App/ SMS / email (only registered email IDs) immediately after activating any service / change of tariff plan. It should be made mandatory.

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Question 3: Should not the tariff details and related terms and conditions be communicated to subscribers of IMR service by SMS and /or email as soon as the phone is switched on in the visiting country by the subscriber. Please elaborate your views.

Ans. Yes. It should be handled in accordance with globally accepted practices. The tariff details and related terms and conditions are to be communicated to subscribers of IMR service by SMS and /or email as soon as the phone is switched on in the visiting country by the subscriber. The complete details should also be made available on TSP's website about the tariff plans pertaining to IMR services which are available on offer for the customer at any given point of time.

Question 4: Please give your views on the significant differences in tariffs for IMR Service under Standard Rates and IR Packs. Furthermore, your views are solicited as to how these two rates can be rationalized.

Ans. The construct of both standard rates and IR packs are significantly different as well as tariffs. Moreover, each of them has their value to the customer depending upon his requirements. It is recommended that it should be left to the market forces for tariff rationalization and end customer requirement.

Question 5: Should not the IR packs apply automatically the moment subscriber's expenses on IMR Services exceed the corresponding daily IR Pack rate unconditionally for all the countries for which the service provider is offering IR Packs?

Ans. Yes. IR packs should apply automatically the moment subscriber's expenses on IMR Services exceed the corresponding daily IR Pack rate, unconditionally, for all the countries for which the service provider is offering IR Packs.

Question 6: Can IR Packs presently offered for one day duration be used to subscribe for multiple days to avail IMR Service? Whether the TSPs be mandated to permit combination of different IR plans as per requirement of the consumer? Please elaborate your submissions.

Ans. IR Packs presently offered for one-day duration is to be used to subscribe for multiple days to avail IMR Service. Further the TSPs are to be mandated to permit combination of different IR plans as per requirement of the consumer. The TSP be

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mandated to have scalable tariff one-day voucher for IMR services which should be auto enabled to increase itself by one day period as and when the subscriber uses the IMR after the end of a particular day. This can either be agreed with subscriber while activation of pack or with a SMS once the subscriber uses the IMR services after ending its one day pack.

Question 7: Why should not the IMR tariff be counted in 24 hour format on the first use of data, making or receiving a call or sending a text message and renewing the charges for only those 24-hour periods in which the services have been used rather than on calendar day basis .? Please elaborate your submissions.

Ans. Yes, we agree with the Authority's view provided it is technically feasible for TSP to configure in its billing system. It will be beneficial for the end customer due to the fact that IMR services are being offered outside the country and the country where customer will be going to avail the IMR service may fall in different time zone as compared with India.

Question 8: In consumer interest why it should not be mandated for the service providers to send updates in respect of the data usage exceeding certain pre-established milestones such as 50%, 80%, 90% and 100% of the data entitlement? Please give your views.

Ans. Yes. In the consumer interest it should be mandated for the service providers to send updates in respect of the data usage exceeding certain pre-established milestones such as 50%, 80%, 90% and 100% of the data entitlement.

Question 9: Will it not be advisable to mandate the TSPs to inform the subscriber by SMS every time the subscriber lands in a country/area not covered by the IR Pack subscribed, of the fact of roaming in an uncovered zone, and the tariffs applicable thereto? Would the aforesaid requirement suffice or whether alongside this, the TSPs be mandated to keep the mobile data in the inactive mode and activate only in accordance with the directions of the subscriber? Are there any other measures that can be taken to cover the situation as detailed?

Ans. TSP should inform the subscriber about Non- IMR services region so as to avoid a confusing scenario. A well aware subscriber then can use other option resulting in saving of time and money. The TSP may not require to keep the mobile data in inactive mode as subscriber's data will only work once he/she is in IMR



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service area. Only thing required in such scenario is to keep subscriber aware as mentioned above.

Question 10: What are your views on the measures suggested in para 3.20 to protect the consumer from bill shocks dues to usage of services beyond the pack entitlements? Please provide your views on each of the above measure and suggest additional measures, which in your opinion can be helpful in addressing the issue.

Ans. By providing timely information about the usage and tariff and extending proper accessible option for IMR services enabler packs, the subscriber can be well aware and the chance to any Bill shock can be reduced to zero.

Question 11: Any other issue relevant to the subject discussed in the consultation paper may be highlighted

Maximum efforts may be made to mandate consumer information about the usage at periodical intervals (Preferably after every use) and tariff while customer is in International roaming. This will go a long way in reducing the Bill shock.
