



DIGITAL
LIFE

RJIL/TRAI/2019-20/452
18th November 2019

To,

Sh. Sanjeev Banzal
Advisor (CA & IT)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg, New Delhi 110002

Subject: Comments on Draft Telecommunication Consumer Education and Protection Fund (Fifth Amendment) Regulations, 2019 dated 18th October 2019.

Dear Sir,

Please find enclosed comments of Reliance Jio Infocomm Ltd. on the Draft Telecommunication Consumer Education and Protection Fund (Fifth Amendment) Regulations, 2019 dated 18.10.2019.

Thanking You,
For Reliance Jio Infocomm Limited,


Kapoor Singh Guliani
Authorised Signatory



Enclosure: As above.

**RELIANCE JIO INFOCOMM LTD'S COMMENTS ON DRAFT
TELECOMMUNICATION CONSUMER EDUCATION AND PROTECTION FUND (FIFTH
AMENDMENT REGULATIONS, 2019**

1. Reliance Jio Infocomm Limited ("RJIL") is thankful to the Authority for providing an opportunity to comment on the draft regulation. At the outset, we submit that RJIL is in agreement with the changes proposed in the draft Regulation.
2. We are taking this opportunity to bring the Authority's attention to a few subsisting issues pertaining to the Telecommunication Consumer Education and Protecting Fund Regulations ("Regulations").
3. We submit that in the current form, the Regulations are focused on the excess amount collected from the subscribers for any reasons and its remittance to the Fund thereof. However, the Regulations do not explicitly address the cases, where the other amounts refundable to subscribers, like refundable security deposit etc., could not be transferred to the subscribers and remained with the Telecom Service Providers (TSPs). We understand that there can be many such scenarios.
4. We request the Authority to clarify whether in all such scenarios, where the subscriber dues are left unremitted with the service provider, come under the Regulations and If so, whether such unpaid payments should be deposited in the Telecommunication Consumers Education and Protection Fund ("Fund"). We request the Authority to provide a clear and unambiguous list of such unpaid pay-outs.
5. We submit that the consequent clarity would improve the consumer friendliness in all financial transactions pertaining to the subscribers and would also lead to uniform practices being adopted across all TSPs. Thus, the Authority is again requested to explicitly prescribe all the heads under which the payment, if unpaid to the customer despite sufficient efforts, should be remitted with the fund.
6. Another related issue is that in certain cases when the TSP is not able to connect with the subscriber, post sufficient efforts to remit the due amount to him, and deposits the amount with the Fund. However, long after such remittance, the subscriber surfaces and approaches the TSP for refund. We request the Authority to prescribe a modus operandi to handle such cases as this scenario is not considered in the Regulations.
7. We would also take this opportunity to request the Authority to revise and modernize the programs undertaken by the Committee for utilizing this Fund for consumer education and protection. With the paradigm shift in the telecom sector and data



centricity across the board, all the consumer education programs should be developed leveraging the digital communication techniques.

8. To summarize, we submit as follows:

- 1. The Authority should clarify and list all the heads under which the payments that remained unpaid to the consumers, should be remitted to the Fund.**
- 2. The Authority should prescribe the process to be followed when the consumer, whose due refund has been deposited with the Fund, approaches the TSP for such payment.**
- 3. The Authority should digitize the consumer awareness and protection programs.**

