



DIGITAL
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RJIL/TRAI/2020-21/90

07th 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: Comments on Consultation Paper on "Regulation of International Mobile Roaming Services" dated 26.05.2020.

Dear Sir,

Please find enclosed comments of Reliance Jio Infocomm Ltd. on Consultation Paper on "Regulation of International Mobile Roaming Services" dated 26.05.2020.

Thanking You,

For **Reliance Jio Infocomm Limited**

Kapoor Singh Guliani
Authorised Signatory



Enclosure: As above.

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**RELIANCE JIO INFOCOMM LTD'S COMMENTS ON TRAI'S CONSULTATION PAPER ON
"REGULATION OF INTERNATIONAL MOBILE ROAMING SERVICES"
(Consultation Paper Dated 26th May 2020)**

1. We thank the Authority for issuing this consultation Paper to take stakeholders views on additional measures required to regulate the International Mobile Roaming (IMR) services in order to prevent bill shocks.
2. Reliance Jio Infocomm Limited (RJIL) appreciates the Authority's concern on introducing International best practices in the realm of IMR services to ensure consumer friendliness and to prevent bill shocks. However, we submit that primary issue behind bill shocks remains insufficient understanding of consumption of IMR services, especially vis-à-vis mobile data. Many consumers do not turn off the auto download/update feature in mobile applications leading to a situation of bill shock with same level of consumption when travelling abroad as in home location.
3. Further, many users are not even aware of the data consumption of such background activities. We understand that providing users with relevant information in an effective manner can prepare them on managing their use of communication services when roaming outside of their home markets. Greater awareness of the charges that they may face when travelling outside their home market can also help users in modifying their consumption patterns and take steps to avoid inadvertent charges. The indicative information regarding background data consumption by various popular applications should be made available on TRAI website for better awareness of the consumers.
4. We understand that increasing the consumer awareness regarding consumption and tariff applicability should address a major part of the bill shock related concerns. We submit that the Authority has already done stellar work in increasing the tariff awareness for both home and IMR tariffs, however, knowing the high impact of high IMR tariffs on bill shock, more can be done to increase the awareness and consumption of IMR tariffs.
5. We submit that the primary tool to increase this awareness is transparency and communication. Regulatory initiatives should be focused on increasing transparency for users, which will help them to better manage their usage of IMR services and understand the implications of roaming on their bills consequently will help reduce bill shock.
6. As noted by the Authority, the ITU, in its International mobile roaming strategic guidelines of 2017 under "Consumer protection" section, has focused on active participation by the Informed Consumer. It notes that the focus should be to empower consumers and allow them to gain access to the necessary information, via transparency of prices and greater

