

Issues for TRAI consultation paper 20/2019

Question 1: Whether TRAI should prescribe any format for publishing tariff? Please support your answer with rationale.

Response: YES The existing system is not only lacking uniformity across TSPs but also creating a lot of confusion to the not so informed and educated customer and need to be standardised in terms of format, while allowing TSPs flexibility to price the offerings as they wish. A suggest standardised format is attached at response to Question 13 at the end of my submission.

Question 2: If the answer to the Question 1 is yes, then please give your views regarding desirability of publishing tariffs on various modes of communication viz., TSP website/Portal, App, SMS, USSD message, Facebook, WhatsApp, Twitter, Customer care centers, Sales outlets etc. If the answer to the question is that tariffs should be published on multiple channels as above, please state whether TRAI should prescribe a separate format for each channel. Please also suggest the essentials of the format for each channel.

Response: Key sources of information to the customer are TSP website / portal , Mobile App & Posters at POS with some amenability for USSD txns at least for a majority of tariff options and transactions. So TRAI should mandate standard format which shall be one and only one , for all these sources and mandate only redirects / hyperlinks to these sources or pdf document from any other online medium like Whatsapp, Facebook, Twitter etc.

Question 3: Whether the extant format prescribed for publishing tariff at TSP's website conveys the relevant information to consumers in a simple yet effective manner? If no, please provide the possible ways in which the same can be made more effective?

Response: NO the offerings and their format by TSPs keep changing often with bundling of varying benefits in line with market dynamics. Such frequent changes are quite a challenge and difficult for a consumer to make any kind of a like to like comparison., or at least to make a cost benefit analysis in broad terms in line with their core telecom needs and usage. They often buy certain bundle of benefits

which they hardly use, just for the reasons of more affordable price denomination, even though they end up buying less volume of their core telecom needs, for which they made that purchase in first place. In effect, they end up paying more for less., because "Nothing can be mentioned as FREE in any bundled benefit, as everything has a price attached to it either explicitly or implicitly, unless it is an unrelated product promotion for a short span of time., which does not consume any of the bundled benefits including data."

Question 4: Whether the service providers be required to publish all the tariff offerings and vouchers in addition to the publishing of tariff plans, in the prescribed format? Please provide rationale for your response.

Response: Absolutely YES., but for pre-paid plans alone, which are consumed by low end users. TSPs have to publish every retail customer offering in a standardised format for all pre-paid offerings (excluding all post paid offerings for which no standardised format is required and fully left to TSPs discretion to package and price), as ample freedom is allowed to the TSPs to bundle and price their products even in the standardised format. HOWEVER IN CASE OF IMPLEMENTATION OF MINIMUM FLOOR PRICES FOR ANYONE OR MORE OF TELECOM BENEFITS SUCH AS INCOMING VALIDITY / TALKTIME / DATA ANYTIME IN FUTURE, THE UNIT RATES OFFERED FOR EACH OF THESE TELECOM BENEFITS SHALL BE THE LOWEST IN THE AL-A-CARTE OFFERING AS COMPARED TO ANY COMBO VOUCHERS, SO THAT A CUSTOMER WHO WISH TO AVAIL ONLY ONE OF THESE BENEFITS IS NOT PUT TO DISADVANTAGE., WITH NO BARS FOR POST PAID PLANS.

Question 5: Whether there is a need to mandate TSPs to introduce a tariff calculator tool to convey the effective cost of enrolment and continued subscription? If yes, what can be the essential features of such a tool? If the answer is in negative, then please give reasons for not mandating such a tool.

Response: No., It would be very complicated to understand for an on-going consumer availing Combo vouchers as such feature involves

unit rate multiplication for each included benefit. However a calculator may be provided for A-la-carte offering as per my format (provided elsewhere in this response), which is easy to design on unit rate basis for each included benefit, subject to minimum floor pricing if any. In case of a new customer a 'Welcome voucher' would be made available for maximum one month or 28 days, with benefits as decided by TSPs, thereafter the customer has to avail the offerings as per standardised format.

Question 6: Whether the service providers be asked to disclose clearly the implications of discontinuation of tariff plan after expiry of mandatory tariff protection period of six months on the provision of non-telecom services offered as a part of the bundle at the time of subscription to a particular plan? If yes, what should be the exact details that service providers may be required to provide in case of bundled offerings? If the answer is in negative, then please give reasons for not mandating such a disclosure.

Response: ***"Nothing can be mentioned as FREE in any bundled benefit, as everything has a price attached to it either explicitly or implicitly, unless it is an unrelated product promotion for a short span of time., which does not consume any of the bundled benefits including data."*** ***However in case of bundling of any non telecom benefit, the TSPs may be mandated to make an explicit prior declaration of minimum assured period for such benefit not exceeding the tariff protection period.***

Question 7: Whether the service providers be required to provide a declaration while reporting tariffs to TRAI and displaying tariffs through its various channels that there are no terms and conditions applicable to a tariff offering other than those disclosed here? Do we require additional measures to ensure that all the terms and conditions are clearly communicated to the subscribers and the Authority? If the answer to the above is yes, then please provide your suggestions in detail. If you do not agree with the above requirement, please provide detailed reasons for the same.

Response: Absolutely YES. TSPs have to make such declaration. The customer exactly gets what they see in the format along with any pre-requisites/ qualifiers mentioned in unambiguous terms . It can't be anything ANYTHING LESS and also NOT ANYTHING MORE as FREE

BENEFIT not mentioned anywhere including carry forward of unused benefits from one billing cycle to another. Without such a declaration, leeway would be left for TSPs to make undocumented customer specific offering/ selective targeting for their own reasons like marketing, promotion, retention, inducement etc .

Question 8: Whether the service providers be required to publish details of all plans in the prescribed format including the plans not on offer for subscription but active otherwise? Please support your answer with rationale.

Response: The prescribed format would be only for current offerings. Further start and end dates are also listed in my format at the end of my response. However withdrawn offerings shall be published in a separately with a suitable caption, for a period not less than the minimum tariff protection period and atleast for one year from the date of withdrawal in case of perpetual plans /subscriptions

Question 9: Whether the service providers be required to update the information on point of sale and retail outlets simultaneously with the launch/change of a tariff offer?

Response: Though online updation can be made instantly, practically it would be difficult to ensure public information at POS all over the circle. Hence regulator may mandate a period of minimum "one week" between the date of notifying the benefits by TSP on their website in the standardised format AND the effective offer date for customers

Question 10: Whether the tariffs published in prescribed formats are displayed on websites of the service providers in an effective manner? If no, should the manner of display on website may also be prescribed by the Authority? If it is felt that the manner of display on website may be prescribed by the Authority, please give your views on the proposed display framework.

Response: The TRAI prescribed standardised format should be displayed along with conditions and foot notes 'AS IT IS'. If TSPs have any technical issues in display on their website or Mobile app, the may attach it as a PDF document with hyperlink/ redirect to their

portal with some unique ID to identify and display such as date of publication or any offering serial no. with year.

Question 11: What are your views on introduction of concept of unique id and requiring the service providers to link the tariff advertisements etc. with corresponding tariffs published in TRAI prescribed formats including requirements to publish dates of implementation of tariff and that of reporting of tariff. Do you think that any other safeguards need to be introduced? If yes, please elaborate. Please support your answer with rationale.

Response: Instead of complicating it with unique ID, regulator may mandate TSPs to declare date of tariff implementation itself as a unique ID in all modes of advertisement for customers to relate with the initially offered benefits by TSPs., assuming that TSPs are allowed to launch maximum one offering in a calendar day. If TRAI wish to allow launching more than one offering in a day, a simple 2/3 digit serial no. suffixed with year can be designated as unique ID for such offering.

Question 12: Whether the proposed monitoring and compliance mechanism is enough to deter any violation of compliance with applicable regulations/directions. If no, please suggest further safeguards that may be introduced to ensure a robust monitoring and compliance mechanism.

Response: A copy of the offering may be mandated to sent to a designated email Inbox of TRAI on the date of notification to examine any violations as reported by consumers later on.

Question 13: Any other issue relevant to the subject discussed in the consultation paper may be highlighted

RESPONSE: Suggested standardised tariff format attached under in-line and also as attachment to my email response.

Uniform template for Publishing Telecom Tariffs across all the mediums of communication as html/jpg/pdf/link

A) Alacarte offerings subject to minimum floor prices if any (as and when TRAI enforces) for Incoming facility /Voice and Data

In 4G / LTE / VoLTE enabled or superior networks, all types of communication incl. Voice, Image/video/ Multimedia shall be metered in terms of data alone and charged accordingly in place of the concept of free voice calling or messaging, as data is the backbone for all such technologies

1. **Standalone charges for incoming facility** for a billing cycle (subject to minimum floor price as and when decided to be stipulated by TRAI)

Days per cycle	Amount
28 / 30 days	
56/ 60 days	
84 / 90 days	
180 days	
365 days	

2. **Standalone Voice/Video Calling /messaging** (with no bundling of extra telecom or non telecom benefits) . Billing to be debited from main balances which carry indefinite validity , as bundling of these benefits with incoming validity / data is prohibited in Alacarte plans

**Voice / Video calling rate per second/minute - XXX
or SMS (local/national / Intl). - XXX**

3. **Standalone 3G/4G Data** at subscriber agnostic uniform & non-discriminatory speeds with no bundling of extra telecom or non telecom benefits

Rate per 0.1 GB or multiples (along with its validity in days)	validity in days & grace period if any	Rate per 1 GB or multiples (along with its validity in days)	validity in days & grace period if any	Effective Date

Alacarte subscriber subject to Floor prices shall have option to purchase standalone Data in multiples of either 0.1 GB or 1 GB or a combination thereof for each cycle of validity period.

B) **BUNDLED OFFERINGS** (subject to minimum floor prices for Incoming/ Voice and / or data as and when enforced by TRAI)

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Voucher Denomination INR	Voucher Category (Topup, Data, STV etc)	Voucher Initial offered Date	Voucher validity end Date (optional)	Incoming & Bundled Benefits Validity days	Voice minutes bundled & local SMSs	Data Volume in GB /MB bundled at user agnostic speeds	Any other Non Telecom benefits bundled and offered during entire period of voucher validity without explicit costs

POINTS TO NOTE FOR UNIFORMITY IN TARIFF REFLECTION :

1. For subscriber clarity all Voucher denominations ending with numeric 0 i.e., multiples of Rs. 10 are exclusively reserved for Talk time Top ups & all vouchers having same digits i.e., 11, 22, 333 etc are reserved for data top up alone, and all other denominations which are not used for alacarte vouchers are free and open to be assigned as Combo vouchers
2. All communication other than Voice and SMSs would be billed from data volumes alone.
3. National & Intl SMSs billing would be made in multiples of local SMSs bundled and specified with each voucher tariff in advance
4. Any facility of carry forward of unused / balance benefits within voucher validity to the next billing cycle shall not be done unless explicitly mentioned against each voucher benefits at column (8)
5. A Voucher denomination value withdrawn shall not be offered again with same / different set of benefits at least for a period of 180 days from the date of last withdrawal date reflected at col. (4)
6. All bundled benefits both telecom and non telecom shall remain valid and in offer till the entire voucher validity date is expired., and no portion of it shall be withdrawn in the interim on the grounds that the same being 'free'. There is nothing called 'free' in a bundled offering as everything has an explicit or implicit cost as the purchase has been made on a bundled basis with pre specified terms and conditions

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