From: DIT Mobile Banking Cell < syndmobile@syndicatebank.co.in>

Date: Aug 23, 2016 6:48:30 PM

Subject: *99# - Consultation Paper of TRAI on the review of regulatory framework for the use of USSD for

Mobile Financial Services To: "advfea1@trai.gov.in"

Dear Sir,

Please find the response from Syndicate Bank on the subject matter.

Thanks & Regards, Mobile Banking Group

Dept. of Information Technology

Corporate Office: Bangalore

http://www.syndicatebank.in

Q1: In your opinion, what should be the maximum number of stages per USSD session for mobile banking service:

- (i) Five
- (ii) Eight
- (iii) Unlimited
- (iv) Any other (please specify)

(Please provide justification in support of your response).

Ans): Five. Beyond this the Customer may not consider the system as user friendly.

Q2: Which of the following methods is appropriate for prescribing the tariff for USSD based mobile banking?

- (i) Cost-based tariff for outgoing USSD session for mobile banking; or
- (ii) Monthly (or periodic) subscription fee for the use of USSD for mobile banking services; or
- (iii) Any other method

Ans)i)Cost-based tariff for outgoing USSD session for mobile banking;

Q3: What methodology should be used for estimating the cost per USSD session for mobile banking service?

Ans): Fixed charges for each transaction

Q4: If your response to the Q2 is 'Any other Method', please provide full details of the method.

Q5: Whether it would be appropriate to mandate the service providers to levy charges for USSD session for mobile banking only if the customer is able to complete his/her transaction? If yes, please describe the method to implement such an arrangement technically?

Ans) No , if the existing charges are reduced to less than 50 paisa then charging for successful transactions is not required.

Q6: Whether the present pricing model for USSD-based mobile banking in which consumers pay for the use of USSD should continue?

Ans) Yes, the charges may be reduced.

Q7: In case your response to the Q6 is in the negative, what should be alternative pricing models? Please provide justification in support of your response.

Q8: Keeping in view the concerns raised by the TSPs, whether there is a need for allowing USSD push sessions when customer-initiated USSD session is dropped due to some reason so that the customer can complete his/her unfinished transaction? Please support your response with justifications.

Ans) No. Since the data goes unencrypted, there may be cases of Fraud transactions.

Q9: Whether it would be appropriate to allow all variety of mobile payment services apart from the mobile baking services on the existing USSD Aggregation platform(s)?Please support your response with justification.

Ans) No.*99# service will become confusing for the users.But this can be implemented in *99# application.

Q10: Is there any other relevant issue which should be considered in the present consultation on the review of regulatory framework for the use of USSD for mobile financial services?

Ans)Server connectivity of Telco.Transaction frequently fails when the service is initiated through BSNL.