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Ref: No. RP/FY20-21/062/828

Dated: 07.07.2020

To,

**Shri Kaushal Kishore,**

**Advisor (F&EA-I),**

Telecom Regulatory Authority of India,

Mahanagar Door Sanchar Bhawan,

JawaharLal Nehru Marg,

New Delhi – 110 002.

**Sub: Consultation Paper on "Regulation of International Mobile Roaming Services."**

Dear Sir,

This is in reference to your above-mentioned consultation paper. In this regard, please find enclosed our response for your kind consideration.

Thanking You,

Yours' Sincerely,

For Bharti Airtel Limited

A handwritten signature in black ink, appearing to read 'Rahul Vatts', written over a white background.

Rahul Vatts

Chief Regulatory Officer

Encl: a.a

## **Bharti Airtel's to TRAI's Consultation Paper on Regulation of International Mobile Roaming Services**

We thank the Authority for coming up with the Consultation paper on the issue of International Mobile Roaming Services and providing us with an opportunity to submit our response on the same.

Airtel has always endeavored to take customer experience to the next level and, on its own, taken various customer-friendly measures. These include ensuring transparency in communication, making customers aware of the charges and usage, preventing bill shocks to the customers, and a simplified journey to avail international roaming. The majority of measures, as put forth in the consultation paper, are already a part of the existing Airtel processes being followed to ensure seamless International Roaming experience to the customer. We strive and will continue to strive to provide the best services to the customer. Any hard coding of the compliances in this regard may limit the operators' ability to further improve upon the processes/ customer experience and should not be attempted if present measures are working efficiently.

In this context, the detailed submission to the queries raised in the consultation paper is as below:

**Q1. 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.**

### **Bharti Airtel's Response:**

Activation of any service needs to be seen in the context of customer awareness in terms of usage and charges. It is relevant to mention that in the case of a postpaid subscriber, the bill for services is generated post facto. Thereby, implying that the customer, who is not tracking his usage on a day to day basis, gets to know of his usage only after the bill has been generated. This is in stark contrast to a prepaid subscriber, who is aware of the usage and charges immediately. Therefore, we recommend different approaches for prepaid and postpaid customers basis the intrinsic nature of services as detailed below:

- **Postpaid Customers:**

In case the postpaid customer is not tracking the usage and charges on the App, he/she gets to know of his/her usage and charges after the bill has been generated. If these services are enabled by default, then it may lead to unintentional usage and bill shocks without his/her consent. To prevent any such bill shock/ unintended usage, it is

recommended that for a postpaid customer, International Mobile Roaming (IMR) service should be inactive at the time of issue of SIM, unless explicitly opted by him/ her. In case, the customer needs to avail IMR services anytime, then he/she can activate the service or buy an IR pack through our website/App or call-centre.

- **Prepaid Customers:**

In the case of prepaid, the customer pre-pays the amount he/ she wishes to spend on telecom services. Every service, such as voice/ data/ SMS has a different rate for unit usage. The balance gets deducted basis the actual usage incurred. The customer is immediately aware of the usage as well as the charges. Hence, all the services, including IMR services, are activated at the time of issuance of SIM.

Further, with the prepaid customers increasingly opting for unlimited packs, a miniscule number of customers have talk time balance available, which effectively implies that even though the IMR service is active, it is only possible to use once the customer has talk time or buys IR pack. Even for the customers who have balance, any usage of IMR services is immediately known to the customer and it is well within his/ her control to stop using the services immediately. Hence, **for prepaid customers, it is recommended that IMR services continue to be active at the time of issuance of SIM.**

The said approach is also followed by Airtel currently and we recommend that the same may be continued considering the merits of approach as elucidated above.

**Q2. 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.**

**Bharti Airtel's Response:**

Currently, customers are duly informed of the services they have subscribed to immediately after activation. If the customer activates the IMR service, a confirmation message of the same is immediately sent.

Further, the details of tariffs are required and relevant to the customer when he/she is likely to make usage and incur charges. Therefore, we inform the customer of detailed pack benefits or standard charges as applicable, as soon as the customer lands abroad and switches on his/her phone.

Even at the point of IMR pack selection or service activation through web or App, the complete details on tariffs are duly provided to the customer for making an informed

decision. Also, when an Airtel customer takes an IMR pack, we send an instant confirmation message containing the pack MRP, benefits, and validity to the customer as per below:


**Pack confirmation SMS - postpaid:**

*"Hi! We have done below updation for your Airtel Mobile XXXXXXXXXX with effect from xx-xxx-xxxx Activation: International roaming pack @ xxx for x day"*

**Pack confirmation SMS - prepaid:**

*"Enjoy unlimited incoming calls, XX mins of outgoing to India & local numbers, XXMB & XX SMS, valid for 1 day."*

For postpaid customers, we also send an email detailing the MRP and validity (*refer below sample email*). For prepaid customers, it is not possible to do the same as the email IDs of the customers is not available in the records.



Dear Deepak Ahuja,  
We have activated International Roaming (IR) service/smartpack on 8882682772 with effect from 20/04/2020.

**Activations:**  
International Roaming @649 Unlimited Incoming - 1 day pack Zone B\_New

**Important points:**

- \* IR packs are **Pay As You Use**. The rental & validity is applicable only for One Time Use when services are used in pack covered countries.
- \* **Discounts are not applicable for Premium-rate No./Satellite/Inmarsat**
- \* Benefits are not applicable in non-covered transit countries
- \* IR usage details are dependent on International operators. Hence, credit limit is not applicable. You may check the real time usage on [Airtel Thanks App](#)
- \* If you are not on a smartpack, to safeguard you from a bill shock, we will activate a one day pack for you if your usage amount for the day crosses the daily pack rental
- \* Packs are applicable across all operators & validity is basis the time zone of visiting country
- \* Call Forward/Voice Mail is charged as per IR rates. To cancel, dial ##002#
- \* For non-covered countries, turn off roaming/mobile data when in WiFi zone/data not required
- \* Important handset settings:
  - Handset data/data roaming:ON
  - Network mode:AUTO
  - APN:[airtelgprs.com](http://airtelgprs.com)(not needed for IOS)
- \* For assistance in roaming, call +919910099100 (IR tollfree) or click [www.airtel.in/ir](http://www.airtel.in/ir).
- \* For T&Cs, [click here](#)

For detailed list of covered countries and country specific packs, click [www.airtel.in/ir](http://www.airtel.in/ir)

Warm regards,  
Team Airtel

Additionally, the Airtel Thanks App is a one stop shop to all the customer information in this regard. The Airtel Thanks App has all the information the customer needs to be aware of, including the activation of IR services/ IMR pack, the applicable tariffs, and the ability to activate/ deactivate the IR services.

It is further observed that sending details of IR pack activation/ tariffs by email doesn't serve the purpose, and customers primarily rely on SMS and the TSP Apps.

Therefore, we recommend that **the method presently followed by Airtel, as detailed above, for informing IR pack activation and tariffs to the customers by SMS/ emails/ App is sufficient and may be continued with.**

**Q3. 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.**

**Bharti Airtel's Response:**

Once the customer lands abroad, it is essential to inform him about the applicable charges so that they can plan their usage accordingly. If the customer is subscribed to an IMR pack, then as soon as he/she lands abroad, we immediately communicate (through SMS) the specific benefits he/she is eligible. If the customer instead has just activated the IMR service and has not subscribed to the pack (pertaining to that country), then we communicate (through SMS) about the standard charges applicable to that country immediately.

The SMS text being used to communicate with the customer is as below:

**SMS with pack details:**

*"Welcome to XXXXXX! You have Rs.XXX pack active on your Airtel Mobile. Enjoy your stay with unlimited incoming calls, XX GB data, XXX SMS, XXX mins of local/calls to India for XX day. Track your usage on Airtel Thanks App - [www.airtel.in/5/irusage](http://www.airtel.in/5/irusage). Airtel wishes you a happy stay!"*

**SMS in case customer is on standard rate:**

*"Welcome to XXXXXX! International Roaming pack is not active on your number. You will be charged as per the international operator rate for your usage. To save on your bills, get Airtel's International Roaming pack at just Rs XXXX & enjoy unlimited incoming calls, XX GB data, XXX SMS, XXX mins of local/calls to India for XX days. To activate call +91XXXXXXXXX (toll free) or click [www.airtel.in/ir](http://www.airtel.in/ir). Airtel wishes you a happy stay!"*

In addition, to allow the customer to have complete control and transparency over his/her usage, we allow our customers to track their data usage real-time on Airtel Thanks App. (Refer Appendix 1). The customers also have the option to enable or disable their International Roaming service through the App and confirmation to the same is also displayed transparently (Refer Appendix – 2 & 3)

Further, our prior experience with the customers suggest that email may not be a preferred option while the customer is on international roaming as he may or may not access his emails. Hence, presently we do not communicate the details via emails considering its lesser utility. In case TRAI believes that the tariff details and related terms and conditions are to be communicated via email, we can look forward to developing this in the future as an additional feature.

Given above, we recommend **SMS as the medium to communicate the tariff details and related terms and conditions to customers of IMR service as soon as the phone is switched on by him/ her in the visiting country.**

**Q4. 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.**

**Bharti Airtel's Response:**

Airtel customers are protected against standard rates through the unique "Roam Without Fear" feature in the countries wherein Airtel International Roaming Pack is available. Any customer who generated usage on standard rates and accumulates charges to the tune of 1 day pack value (Rs 449 or 649 depending upon country), we cap the expense at the daily pack value and provide customers full benefits of the 1 day pack. After the consumption of the 1 day pack, the data service is barred to prevent accidental usage. Therefore, customer's exposure is limited to the tune of Rs 649 per day. There are some customers who do not accumulate charges to the tune of one day pack. The average expense of these customers is below Rs 200 on standard rates.

For customers visiting non-pack countries, the internet services is deactivated by default and is only activated upon customer's request. A miniscule 0.4% customers use the services in non-pack countries, and our initiative to keep the data service deactivated keeps customers away from having any bill shock

Therefore, in our view, rationalization of standard rates doesn't impact the customers as they are already protected with the measures undertaken by us and **any such change will not have any material impact on customer experience.**

**Q5. 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?**

**Bharti Airtel's Response:**

Absolutely, wherever possible, the service provider must try and protect the customer from bill shocks. **Airtel automatically applies IR daily packs when subscribers' expenses on IMR Services exceed the corresponding daily IR Pack rate in all the countries where IR packs are offered.**

**Q6. 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.**

**Bharti Airtel's Response:**

Yes, if the customer wants to use the one-day packs for multiple durations, he/she can keep the service on and not subscribe to any pack. Through the concept of 'Roam without Fear', Airtel will automatically apply IR one-day packs when subscribers' expenses on IMR Services exceed the corresponding daily IR Pack rate. As mentioned earlier, this is done unconditionally for all the countries where we are offering IR Packs. Also, customers are free to deactivate or change for a new IR pack through our website/App. (*Refer Appendix 4*)

Further, we allow customers to take IR packs in all possible combinations with the restriction that the customer has to first complete the validity of his current pack before he can subscribe to his next pack. This is done to help customers complete their subscribed packs before unknowingly taking a new pack.

For instance, if a customer travels for 12 days, he/she would have to first take the 10 days pack and complete its validity till 10 days. After this, he/she can take one-packs for the 11<sup>th</sup> and 12<sup>th</sup> days. This way, customer can take IR packs in any possible combination.

**Q7. Why should not the IMR tariff be counted in 24hours 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.**

**Bharti Airtel's Response:**

The IMR tariff be counted in 24hours format basis first usage will be highly non-standardized approach and has the following shortcomings:

- First, such a format would mean the pack's validity will be varying across customers depending on their first-day's landing time. This is a highly chaotic way of giving benefits to customers.
- Second, even for a single customer, there is a possibility that on the first trip the pack will expire at 3PM every single day, while on the second trip it will expire at 9 PM every day. There would be no standard time at which the IMR pack will expire and making the experience muddled across trips.
- Third and the most important reason is that it is based on the assumption that the customer will remember and keep track of the exact hour of landing throughout his fortnight-long trip. It is a highly possible scenario that the customer might forget it, which would lead to usage unknowingly, resulting in bill shock.

To summarize, the 24hours format post first-usage is not just a non-standardized approach but would also result in excess billing for the customer due to high chances of mistaken usage.

On the other hand, a calendar day-based format will ensure the customer can intuitively grasp the start and end times of the pack. In our experience, customers have rarely raised concerns regarding this issue. Hence, **the calendar day-based validity should continue to be the norm.**

**Q8. 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.**

**Bharti Airtel's Response:**

We understand that having complete visibility of data consumption on a real-time basis is extremely critical for holistic customer experience. Airtel does send updates on completion of 50%, 90% and 100% of data entitlement by SMS. In our view, adding further data usage percentage levels in addition to these won't improve customer experience. Sample SMS script being sent to the customer to inform the customer of its data usage is as below:

*“Alert! You have consumed approx. 50% of the XXGB pack data on your Airtel No. +91 XXXXXXXXXXX. Please note, there could be some variation in actual usage as the details are dependent on international operators. Track your usage on Airtel Thanks App - [www.airtel.in/5/irusage](http://www.airtel.in/5/irusage).”*



Further, Airtel has introduced the industry-first feature to give real-time visibility to customers on their data usage on Airtel Thanks App (*Screenshot shared in Appendix-1*). This measure is far more intuitive and in line with digital-first approach of Airtel.

In case the customer misses all these checks and completes 100% of his quota without realizing it, we further safeguard the customer. We bar the customer from making additional data usage the moment he completes 100% of his/ her pack quota. There is no volume-based charging allowed beyond pack-quota. All these steps are taken to ensure that the customer has utterly shock-free experience at all times during IR usage.

**Q9. 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?**

**Bharti Airtel's Response:**

Airtel does inform the subscriber by SMS every time the subscriber lands in a country/area not covered by the IR Pack subscribed. We inform him/her of the fact that they are now roaming in an uncovered zone and refer them to tariffs applicable thereto. (*Refer the sample SMS script below*)

*"Welcome to XXXXXX! International Roaming pack is not active on your number. You will be charged as per the international operator rate for your usage. To save on your bills, get Airtel's International Roaming pack at just Rs.XXXX & enjoy unlimited incoming calls, XX GB data, XXX SMS, XXX mins of local/calls to India for XX days. To activate call +91XXXXXXXXXX (toll free) or click [www.airtel.in/ir](http://www.airtel.in/ir). Airtel wishes you a happy stay!"*

Further, we cannot keep the mobile data in an inactive state if the customer has activated the IR service and going to a pack covered country. However, even in such cases, we protect consumers from unforeseen shocks through 'Roam without fear' packs, which is the daily pack, as explained above.

In case a customer has IR service activated but travels in a non-pack country, we keep the data service inactive because we do not have the one-day pack to safeguard the customer. However, even in such a case the customer may request to enable the data service if they require.

**Q10. 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.**

**Bharti Airtel's Response:**

All Airtel packs are 'safe packs'; i.e., if a customer takes a pack and completely utilizes the data up to the pack entitlement, the data service is automatically barred. No additional charging is done basis post-pack benefit rates. This was done after hearing customer voice related to unintentional data usage as they didn't realize that they had already utilized 100% of their data quota, and unknowingly usage went beyond this.

However, such accidental usage applies only to data and not to voice minutes. In our experience, customers are conscious about how much voice minutes they are consuming, and we seldom hear cases related to this.

In view of the above, we recommend that post-pack quota blocking is not required for voice minutes and, in fact, will be a point of customer dissatisfaction if implemented. The reason is that in most cases, customers just need to talk for 5-10 extra minutes and don't mind getting charged on the post-pack benefit tariffs for this. To facilitate such tracking of voice and data usage with regards to quota available, we have given consumption tracking to all IR pack takers on Airtel Thanks App.

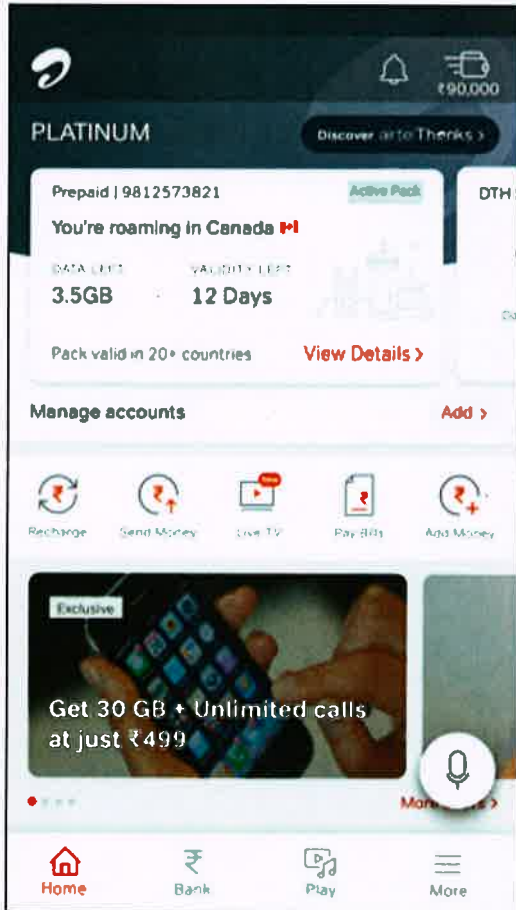
**Q11. Any other issue relevant to the subject discussed in the consultation paper may be highlighted.**

**Bharti Airtel's Response:**

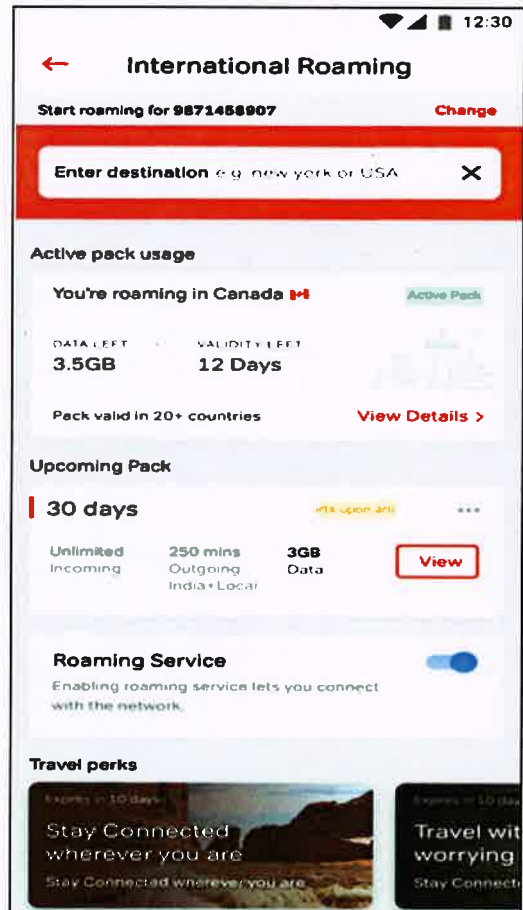
No additional comments.

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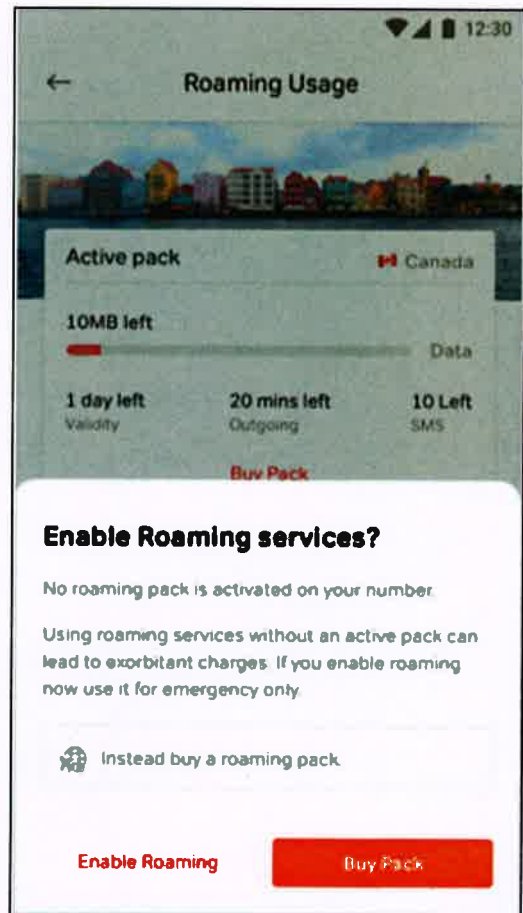
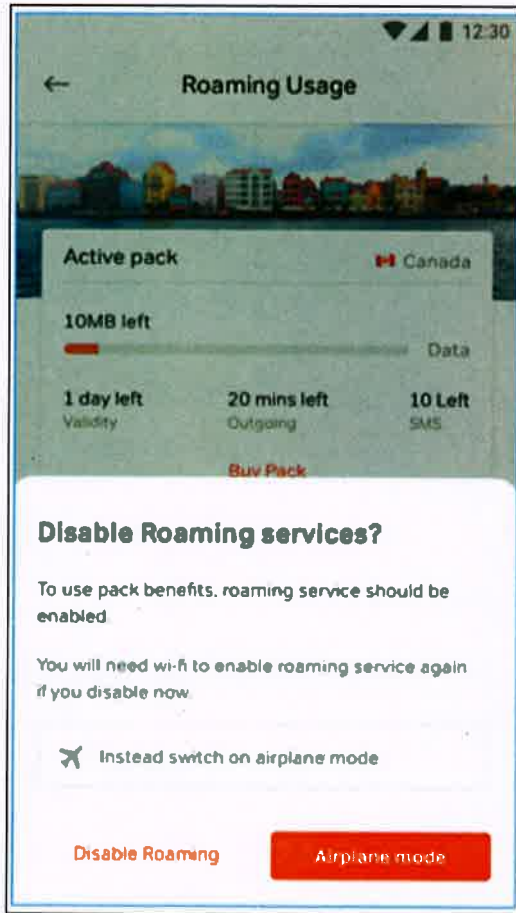
Appendix 1: Usage on App Home screen



Appendix 2: Option to enable/disable IR service while in roaming



### Appendix 3: Disable/Enable Roaming service confirmation while in roaming



#### Appendix 4: Deactivate or change IR pack

