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To,

Shri. Kaushal Kishore,
Advisor (Finance & Economic Analysis - I)
TRAI.

Sir,

Subject:- Comments on Consultation paper on Transparency in Publishing of Tariff Offers

We are a registered CAG of TRAI.

We are pleased to enclose our comments/suggestions on the above consultation paper.

Thanking you,
Yours Sincerely

GOPAL RATNAM V
Secretary
Consumer Care Society

BLUE indicates Consumer Care Society's Comments

Issues for consultation

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

Yes. There is an urgent need for standardisation of the format for publishing tariff. The reasons are as follows,

1. Different Service Providers provide different pieces of information and sometimes incomplete information. It is very difficult if not impossible for the consumers to comprehend and make informed choices.

2. The information published by the service provider is structured in a particular format keeping their marketing objectives and generally intends to misdirect or confuse the consumer . The consumers therefore are forced to collate the relevant information from multiple sources to enable them to make reasonably good decisions.

An example of this is that is the “best” or “popular” offer or plan that is usually listed first or highlighted by the service provider. This misleads the consumer to opt for these plans without them reasoning and taking a considered decision. This leads to wastage of resources both at the consumer and service provider ends.

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.

Yes. Tariffs should be published on different modes of communications as Consumers access information across different channels/modes.

Yes. As different channels/modes of communications have varied attributes and constraints it is prudent to have a separate format for the channels. As the volume of information provided across the channels varies, it would be necessary for TRAI to prescribe separate format for different channels.

Different format are required for channels. Our suggestion is structured such that with the essential information is provided in the channel with low information carrying capacity, then incremental adding more information with the website of the service provider providing the maximum information on the tariffs.

A SIMPLE tabular format is suggested for ease of display and understanding. Some examples of the plans are provided along with the possible categorisation of the plans. The bigger string indicates larger value. (for eg. XXX is bigger than XX)

BASIC PLANS - 7 Nos.						
Sl. No.	AMOUNT	VALIDITY (in days)	VOICE (in Minutes)	SMS (number)	DATA (in MB only)	ANY CONDITIONS
<i>VOICE ONLY</i>						
1	XX	YY	A	0	0	NO
2	XX	YY	AA	0	0	YES
3	XXX	YYY	A	0	0	NO

DATA ONLY						
1	X	YY	0	0	C	YES
2	XX	YY	0	0	CC	NO
COMBINED VOICE and DATA						
1	XX	YY	A	0	C	
2	XXX	YY	A	0	CCC	Check Website
TOP-UP VOUCHERs - 4 Nos.						
Sl. No.	AMOUNT	VALIDITY (in days)	VOICE (in Minutes)	SMS (number)	DATA (in MB only)	PLANS TO WHICH APPLICABLE
1						
2						
3						
4						

The Details should be provided from the lowest amount upwards rather in a random or haphazard manner. The number of plans available at a given instant should be indicated so the consumer is aware of the number of options available. Further, if there is any conditions attached to the plan, this is indicated in the last column. No details are provide in the lowest information carrying media/mode, however the complete detail is provided on the website and the showroom/retail centres.

Details can be added depending on the media/mode.

1. For in the case of the website the detailed conditions and restrictions of the plans should be elucidated.
2. The Basic plans can be provided in the lowest information carrying media/mode and all the Plans and Vouchers should be published on the web site.
3. The Vouchers should be listed as per plans for this they are applicable.

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?

NO. The current format is quite complicated and does not aid the consumer to choose the right plan. Also the different TSP are following different structure for the information published.

These are the possible ways that it can be made more effective and can be considered atleast for the pre-paid plans as this is what majority of the individual consumer would be availing.

1. The number of Pre-paid plans should be reduced from the current 25 to a maximum of ten (10) only. If this is not considered feasible then the number of plans in each category should be limited to five (5) only. Many scientific studies indicate that Consumers can not good choices when the number of options increase.
2. The TSP impose various restrictions/conditions on a single tariff plan confusing the consumer. Hence there should be plans WITHOUT any conditions in each category especially the lowest plan.

3. When the TSP impose restrictions/conditions these should be limited.

Once these suggestions are implemented the plans themselves would be more transparent and hence it would be easier to publish them.

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.

YES. The consumer should have access to all relevant information which includes tariff offerings and vouchers in addition to tariff plans. The rationale is that the requirement of the consumer could change over time and hence he should be aware of the different options available. However these should have a separate table or be on a separate page.

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.

YES. As rightly mentioned in the consultation paper, there is a large number of tariff plans and vouchers. It is very difficult for the consumer to make a considered choice due to bounded rationality.

This tool should have the limited inputs as follows,

- 1. Monthly expenditure on telecom.**
- 2. Voice in minutes per month**
- 3. Data usage in GB per month**

Or should be self tracking the consumer's usage pattern.

The output of the tool can be suggested plan options in order of fit.

It is suggested that TRAI conduct a hackathon to develop an app which can be downloaded to a consumer's phone to track their usage and suggest the best tariff options.

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.

YES. Consumers' tend to forget the add-ons of non-telecom services over a period of time and they need to be reminded about the implications of change of tariff plan.

The Service Provider should list both these sets of details;

- 1. The benefits that the consumer would lose as the result of discontinuation of tariff plans.**
- 2. The costs that the consumer would incur as the result of discontinuation of tariff plans.**

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.

YES. There should be a declaration by the Service providers while reporting tariffs to TRAI and displaying tariffs through the various channels that there are no terms and conditions applicable to a tariff offering other than those disclosed.

Since tariffs is the most important factor in the consumer decision making and ensures that he is not mislead or worse cheated it is necessary that there be adequate punitive actions to ensure disclosures.

YES. In the event there is misleading or non-disclosure of the terms and conditions leading to improper decisions by the consumers, the Service Providers should be penalised and the amount transferred to CUTCEF.

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.

YES. With frequent changes in the tariffs being made by the Service Providers and marketing/selling claims being made that a new is a better deal for the consumer, the consumer is a loss to make a comparison about the benefits of the two plans - active and new offer. This is due to the fact an average consumer does not maintain records of the plans she is subscribed to.

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?

YES. This should be done simultaneously at the POS and Retail outlets. There is a large number of consumers who touch point with the service providers is the Company owned stores and third party retail outlets. There is a frequent mis-selling and hard selling of plans that provide benefits to the service providers or the third party. With rapid communications infrastructure available it is imperative that ALL touch points are updated with the tariff order change or launch.

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.

NO. Almost all service providers provide truncated details of the plan on the website. While in the case of low information channel/mode it would be obviously the only way, it is necessary that the entire details of the plan should be on the website.

If all the information of a plan is provided in whatever format - whether TRAI or the Service Provider, the information is likely to be overwhelming the consumer and hence defeat the purpose of publishing the tariffs.

It is necessary that the Regulatory authority direct the Service Provider to provide total expenses to enable the consumer to base their decisions on these. These would be

Sl.No	Type of Charge	Amount
1	One Time Fees	
	Refundable	
	Not-Refundable	
2	Recurring Plan Charges	
3	Other Expenses during the plan period	
	TOTAL	
	Cost of Plan per Day	

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.

YES, both these measures of generating unique id and linking the tariff advertisements with the TRAI prescribed formats would provide additional safeguards to the consumers.

YES. Monitoring the publication of tariffs at the marketplace, showrooms/stores/retail outlets have to be monitored on continuous realtime basis.

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.

NO. The mandate is that the TSP publish the tariffs across different channels to ensure transparency. However a large number of consumers would still not be available to access the media channels or prefer to deal with the personal channels that of Sales Outlets. In these situations there is wide spread mis-selling done by the TSP own sales outlets and their authorised dealer outlets.

Ending this would be possible only with a number of measures.

1. As mentioned earlier consumer need accurate and relevant information on tariffs to make a reasoned and beneficial decision. If the Service Provider misleads or obfuscates the information provided to the consumer there should be punitive fines imposed.

2. Currently Service Providers are lethargic in updating the information - tariffs and others, in their showrooms/stores and third party outlets. Since it is possible for TRAI to check this across the country, TRAI should authorize the registered Consumer Advocacy Groups (CAGs) across the country to do so.

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

A couple of suggestions that are linked to the issues covered are,

1. TRAI conduct a hackathon to develop an app for tariff plan selection to ensure that the consumers' have an independent option in addition to the Service Provider's tariff tool. This app can be downloaded to the consumer's phone and it could track Consumer's telecom usage. Based on this information the best plan options can be suggested.

2. TRAI should utilise its network of Consumer Advocacy Groups (CAGs) across the country to monitor and report to TRAI any violation of the the tariff regulations. Merely asking Service Provider compliance reports or expecting Service Provider to proactively ensure compliance is illusory. Proper and continuous monitoring of tariff regulations is imperative.

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