

Dear Sirs,

My comments on the above mentioned consultation paper are as follows:

Question 1: Do you think that the measures prescribed currently are adequate to ensure transparency in the tariff offers made by TSPs? If not, then, what additional measures should be prescribed by the TRAI in this regard? Kindly support your response with justification.

YES

Question2: Whether current definition relating to “nondiscrimination” is adequate? If no, then please suggest additional measures/features to ensure “non-discrimination”.

YES

Question 3: Which tariff offers should qualify as promotional offers? What should be the features of a promotional offer? Is there a need to restrict the number of promotional offers that can be launched by a TSP, in a calendar year one after another and/or concurrently?

Not more than six promotional offers should be permitted in a year. Any deviation from promulgated Tariff downwards should be considered Promotional offer. If free time usage is being permitted than it should be data and time bound. No continuous/concurrent/overlap launch for promotional offer should be permitted.

Question 4: What should be the different relevant markets – relevant product market & relevant geographic market – in telecom services? Please support your answer with justification.

To become one India and futuristic digital trends, geographic market should be promoted under strict supervision of TRAI, to achieve the goal of digital India. Presently its fragmented and no state goal or parameters being defined hence product and merchant base market in vogue.

Question 5: How to define dominance in these relevant markets? Please suggest the criteria for determination of dominance.

Dominance can be defined once goals and even playing field is provided for exploitation of spectrum, equally and towards a mandated roadmap. Presently dominience is governed by business benchmarks which is market share revenues.

Question 6: How to assess Significant Market Power (SMP) in each relevant market? What are the relevant factors which should be taken into consideration?

Not in a position to answer.

Question 7: What methods/processes should be applied by the Regulator to assess predatory pricing by a service provider in the relevant market?

Not in a position to answer.

Question 8: Any other issue relevant to the subject discussed in the Consultation Paper may be highlighted.

I would like to see regulations that protect consumers from unfair pricing and should be cost based.

Best regards
Dr. Deepa Kapoor
Consumer