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FEDERATION OF CONSUMER AND SERVICE ORGANIZATIONS

Promoted exclusively to deal with the pressing issues..

(Regd. No.CAG/01/2016 as a Consumer advocacy group with TRAI)

No.5, 4th Street, Lakshmipuram,
Tiruchirappalli – 620 010. T.N. State .

The Secretary,
Telecom Regulatory Authority of India,
New Delhi – 110 002

16.02.2020

Kind attention to: **Kaushal Kishore, Advisor, (F & E.A.)**

Sir,

Sub: **forward our Comment on Consultation Paper** Transference in
Publishing Tariff Offers – reg:

We respectfully submit our view on above consultation paper for your kind perusal and necessary consideration in the interest of Consumer at large:

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

Ans: Yes, it should prescribe some format for publishing tariff and it should be regional languages to reach the telecom consumers in gross route level.

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.

Ans: It may publish above mentioned all forms; apart the TSP to send the tariffs to their subscribers through SMS in the local languages enable to

reach the telecom consumers, those who are unreached through the above said medias.

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?

Ans: through SMS that too in the local language.

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.

Ans: Yes, the TSPs would require to publish all of their tariff.

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.

Ans: The SMS is better..

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.

Ans: The TSPs may remind their subscribers to extend the bundled facility, presently the subscribers is availing. If there is no response from the Subscribers, the TSPs may stop the facility and they would not extend the facility without the consent of the subscribers.

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.

Ans: Yes, the TSPs should provide all information to the subscribers as well as authority. The authority may display within website to aware of the public.

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.

Ans: Yes, they have to provide

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?

Ans: Yes, they have to update

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.

Ans: Yes, the tariffs published in prescribed formats are displayed on both TSPs as well as Authorities website.

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.

Ans: At present this may sufficient and will modify in future.

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.

Ans: At present this may sufficient on this issue (Transference in Publishing Tariff Offers)

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

Ans: The Telecom Consumer Complaint Redressal Regulation, 2012 to reamed considering the present development of the Industry.

Thanking You,

Yours Sincerely,

M. Sekaran.
President.
Registered CAG with TRAI