



# RAJKOT SAHER JILLA GRAHAK SURAKSHA MANDAL

રાજકોટ શહેર/જિલ્લા ગ્રાહક સુરક્ષા મંડળ, રાજકોટ

**DISTRICT CONSUMER INFORMATION CENTRE**

(Approved by Ministry of Consumer Affairs, F. & P. D. Govt. of India New Delhi)

329, POPATBHAI SORATHIA BHAVAN, SADAR BAZAR, RAJKOT-360001, GUJARAT

**Tel : 0281-2471122 - 3041329 (O) 2574400 (R)**

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## RAMJIBHAI MAVANI

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Ex-M.P. (Lok Sabha)  
FOUNDER PRESIDENT

## RAMABEN MAVANI

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Ex-M.P. (Lok Sabha)  
PRESIDENT

### PRESIDENT

District Consumer  
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### CHAIRPERSON

Consumer Coordination  
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### EDITOR

"Grahak Vani"

Weekly Gujarati Newspaper

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Bureau of Indian Standards,  
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Central Consumer  
Protection Council (CCPC),  
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District Civil Supply  
Committee, Rajkot

Programme Advisory  
Committee, Door Darshan  
Kendra, Ahmedabad

## GENERAL SECRETARY

Indo-China Friendship  
Society, New Delhi

## ELECTED DIRECTOR

Shri Sahyog Credit Co-  
operative Society Limited,  
Rajkot

### SECRETARY

Shantiniketan Co-op.  
Housing Society, Rajkot

## ELECTED DIRECTOR

Consumer Affairs &  
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Gujarat (CAPAG),  
Ahmedabad

## AWARDS WIN

Swami Vivekananda  
National Award for  
outstanding contribution in  
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Consumer Protection for the  
year-2000

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Consumer Protection  
for the year – 2001

Gujarat State Award for  
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the field of  
Consumer Protection  
for the year 2004-05

Gujarat State Award for  
outstanding contribution in  
the field of  
Consumer Protection  
for the year 2005-06

To,

20/01/2020

1. **Respected brother Shri S. K. Gupta, Hon'ble Secretary,  
Telecom Regulatory Authority of India (TRAI)  
New Delhi-110 002**
2. **Respected brother Shri Kaushal Kishore, Hon'ble Advisor  
(Finance & Economic Analysis-I)  
Telecom Regulatory Authority of India (TRAI)  
New Delhi-110 002**

**Sub. : Regarding Consultation Paper on Transparency in Publishing of Tariff Offers**

Respected brother,

Our presence at the CUTCEF Meeting on **09<sup>th</sup> January, 2020** at New Delhi, and topic discussed in the meeting regarding the above subject, we respectfully submit the following suggestions before the Authority to consider the following in the larger interest of telecom consumers.

- Q.1, Answer : YES
- Q.2, Answer : Publishing tariffs on various modes of communication viz., TSP website/Portal, App, SMS, USSD message, Facebook, WhatsApp, Twitter, Customer Care Centre, Sales outlets etc.
- Q.3, Answer : Yes, publishing tariff at TSP's website in Regional Language according to Statewise regional Language and all the leaflets, pamphlets, brochure, fliers, BANNERS should be in regional language, with Big Font containing TARIFFS details, but not higher cost.
- Q.4, Answer : To reach at Rural Areas through CAG, As our organization, (Rajkot Saher Jilla Grahak Suraksha Mandal) President Ramaben Mavani, conducting Consumer Awareness Programme (CAP) at grass route level, and all the leaflets, pamphlets, brochure, fliers, BANNERS should be in regional language, with Big Font containing TARIFFS details, but not higher cost.
- Q.5. Answer : Yes, it should be mandatory to introduce Tariff Calculator by TSPs to convey the effective cost of enrolment and continued subscription, mentioned in that about the details of comparisons and benefits of consumers.
- Q.6. Answer : Yes, TSPs 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. Also details should be provided about the comparisons with other Service providers and offer in time inform to customer by SMS, CALLS, for renewals with the same or new Tariffs.
- Q.7. Answer : Yes, declaration by Service providers is required to provide 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 declared and additional measures regarding terms and conditions whether clearly communicated to the subscribers and the Authority is required. That subscriber should have rights to see the declaration by TSP to Authority, so that the transparency between TSPs and Authority and the same between TSPs and subscribers without terms and conditions.



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Q.8. Answer : The Service Providers requires to update the tariffs plans on the website and customer care centers by 7<sup>th</sup> day of January, April, July and October at their points of sale and retail outlets. But it should be also update at the point of sale and Retail outlets regarding the updates in Tariffs plans and update the information simultaneously on all channels of communication at the time of introducing/modifying a tariff offer. Also the plans not on offer for subscription should be removed from all the channels of communication.

Q.9. Answer : Yes, service providers required to update the information on point of sale and retail outlets simultaneously with the launch/change of a tariff offer, The service providers publish the updated Tariffs on the websites, pamphlets, posters, etc. The online filing of tariffs entails generation of a unique id for each tariff filed with the Authority. The service providers may be required to display the unique id of each tariff offerings wherever and in whatever form, they advertise and publish details of tariffs. Further, as regards the display of information on websites/apps of service providers, they may be required to provide a hyperlink to the tariff for the same plan in the TRAI prescribed format in a prominent manner.

Q.10. Answer : Yes, the tariffs published in prescribed formats are displayed on websites of the service providers in an effective manner with the prior approval of Authority on the manner of display on website of TSP.

Q.11. Answer : In this regard, it is felt that some of the proposed changes in display framework particularly the use of unique id and mandating display of date of implementation and date of reporting have the potential of creating the required self-evident monitoring and compliance framework. In addition, the service providers may also be required to provide a self-certificate on a quarterly basis to the effect that all tariff offers have been displayed on website in compliance with the regulations/directions of the Authority in this regard.

Q.12. Answer : Yes, it is sufficient in the monitoring and compliance mechanism to deter any violation of compliance with applicable regulations/directions.

We appeal to consider the above comments in the larger interest of subscribers and hope that the above suggestions may be taken to account.

Thanking you,

Yours sister,

*R. R. Mavani*

Ramaben Mavani,

President, Rajkot Saher Jilla Grahak Suraksha Mandal, Rajkot.

Member, CAG with TRAI

Member, CUTCEF

Copy to :

The Joint Advisor, CA. TRAI