

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.

Answer 1 No, the measures currently prescribed to ensure transparency in the tariff orders made by TSPs are not adequate and not effective in implementation. Many a times the telephone companies provide different offers to the different customers clearly ridiculing the transparency.

Question 2: Whether current definition relating to “nondiscrimination” is adequate? If no, then please suggest additional measures/features to ensure “non-discrimination”.

Answer 2 No. Special tariff plans are provided to new subscribers while there is no such offer for existing subscribers.

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?

Answer 3 Any benefit given over and above the normal plan

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

Answer 4 These are not new words or area. So TRAI should find the answers with the help of ongoing practices, extant regulations in the country and then should ask for opinion.

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

Answer 5 To define dominance in the relevant market, The Competition Act, 2002 may be considered in letter and spirit.

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

Answer 6 : TRAI should undertake independent study with the help of Institute or University of repute to decide about this

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

Answer 7 : The intent is the most important thing. Remaining all are secondary. But unfortunately in the recent case the intent was ignored. Any way predatory pricing is not bad for consumers it may be bad for other market players and government so TRAI should get answers from them. What is important from consumers' point of view is protection from unfair pricing. For example, till now the companies were charging heavy rates for data which has been set right by entry of Jio so at times it is beneficial also.

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

Answer 8: The most relevant issue is bundled product. These should be separated as they are misleading, difficult to understand and often beneficial for telephone companies.

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