



**VIL Comments to the TRAI Consultation Paper on the
“Review of Telecom Consumers Protection Regulations (TCPR), 2012”
issued on 26.07.2024**

At the outset, we are thankful to the Authority for giving us this opportunity to provide our comments to the TRAI Consultation Paper on “Consultation Paper on Review of Telecom Consumers Protection Regulations (TCPR), 2012” dated July 26, 2024.

In this regard, we would like to submit our comments as given below, for Authority's kind consideration.

Question 1: How do current tariff plans offered by telecom service providers align with the preferences and usage patterns of consumers, particularly elderly individuals? Please Justify with rationale.

VIL Comments to Question 1:

1. **Forbearance Regime for Tariffs:** We would like to highlight that VIL has been a strong proponent of forbearance for tariffs. TRAI had prescribed Forbearance regime for tariffs through its 23rd amendment to Telecommunication Tariff Order (TTO), 1999 dated September 06, 2002. Given the competition in the telecom market in India, the TSPs closely monitor the market and the evolving needs of the different segments of society, and design the best suited tariffs.
2. **Tariffs for different user segments:** Within the framework provided by TRAI, our tariffs are designed based on various considerations like network capacities, competitive offers, usage by different segment of users, choice of content, devices, ARPU etc. Basis these factors, our Marketing team provides best portfolio of tariffs, which can suit both usage of existing consumers as well as attract new consumers.
3. **VIL recommendation:** In our view, there are adequate tariff options available in market, which aligns with the preference and usage patterns of the consumers at large.

Question 2: Is there a need for separate plans for Voice & SMS and data to meet the specific requirements of subscribers. Please justify with reasons.

VIL Comments to Question 2:



1. At the outset, we would like to state that there are already many combinations/prepositions of tariffs being marketed as of today. The tariffs are designed with a lot of research and market surveys by the Business, and are launched in the market only after a specific consumer requirement is being felt.
2. **Adequate options already available:** There are affordable tariff offers already available in market which substantially caters to the option of Voice + SMS and data only services. At VIL, we have designed certain packs for said construct, only except that minimal additional data benefits are also provided to meet emergency requirements and hence, there are enough options available with Indian consumers to avail the said services. There is no need of regulatory mandate in this regard, which otherwise will go against the principle of forbearance.
3. **Tariffs of Core telecommunication services are interlinked**
 - a. Considering the advanced technologies like 4G/5G, the services are offered to consumers as a bouquet of all core telecommunication services. Unlike older technologies, where voice was primary driver of network usage, in newer technologies both voice and data play substantial role in usage of network. In 5G network, data plays a more prominent role in usage of network.
 - b. The telecom tariff offers are designed keeping in mind the network usage and thus, are combination of tariff for all core telecommunication services i.e. voice, data and sms.
 - c. It would be undesirable to put in place a commercial principle for tariffs to be designed considering only one core telecommunication service i.e. voice. Creation of such tariffs and its reasonable uptake in market would create unforeseen impact to the network usage and create imbalance in usage of different core telecommunication services.
 - d. Furthermore, even if separate tariffs for voice is to be designed, it would not serve any objective, as the industry is already providing unlimited voice in almost all tariff offers. In most of the offers, the variable core telecommunication service is Data.
4. **Voice only packs will increase Digital Divide:**
 - a. We would also like to mention that providing tariffs offers with only Voice and/or SMS would discourage the non-data users from using data.
 - b. The Indian Government has been giving a strategic push to its Digital India Mission, thereby aiming to bridge the digital gap and increase digital inclusion.
 - c. As whole of India is moving towards digitization, huge number of Government services/information, content, entertainment, payment and financial services, e-commerce, utility bills and payments, education, health etc. are hosting their services over Internet for providing online services to the consumers. This Digital uptake has been driven upwards



significantly during the Covid times, which has pushed the society including the marginal ones, to learn new digital ways.

- d. Any regulatory push to have packs without Data or incoming only packs, may reverse the efforts made for digital inclusion in the past few years and might induce the marginal ones to stop using digital ways, in the name of affordability. This would also undermine the efforts of the Government to create digital citizens and negatively impact digital adoption in the country. Thus, it is important to consider the disadvantages also of mandating voice only tariff offer.

5. Affordability:

- a. Tariffs in India are already substantially cheaper than tariff across the globe. There is not much price elasticity available in the lower end of the tariff packs. The packs are available at as low as Rs 6-7 per day for Voice + SMS.
- b. The existing additional data being provided is a pro-consumer approach adopted by us for providing emergency access to consumer as well as to help them learn and adopt digital ways without initially recharging with data-based packs.

6. **Other concerns:** Voice only plans will definitely end up discouraging data usage and drastically impact wireless broadband numbers in the country. It will also encourage dual SIM concept which was widely prevalent in market few years back.

7. Tariff plans mandated by TRAI should be excluded from 25 retail tariff plans:

- a. The TSPs are allowed 25 tariff plans to offered in the market which ensures that space is given to the Service Providers to cater to retail customers considering forbearance regime. However, the plans which are regulated are included in the capping of 25 tariff plans and curtails the freedom available to TSPs and hence, reduces the forbearance to that extent.
- b. We submit that in the event that a voice only plan is mandated like the tariff plans mandated by TRAI vide TTO 66th and 67th amendment, they should be excluded from the cap of 25 tariff plans.

8. VIL recommendations:

- a. Considering all above, we humbly request the Authority that there is no need of intervention on providing tariff offers for Voice + SMS or data only tariff offers.
- b. We would also like to mention that regulated offers reduces the freedom available under forbearance especially the 25 tariff plan. Therefore, in case the Authority doesn't agree with



our contentions, we request that the regulated plans (including the plans mandated by TRAI vide TTO 66th and 67th amendment) should be excluded from the capping of 25 Tariff plans.

Question 3: Whether the maximum validity of Special Tariff Vouchers (STVs) and Combo Vouchers (CVs) for consumers should be increased? Please Justify your response with reasons.

and

Question 4: Are there specific consumer segments that would benefit from longer validity periods for Special Tariff Vouchers (STVs) and Combo Vouchers (CVs)? Please Justify along with rationale.

VIL Comments to Question 3 and 4:

1. Maximum validity in STVs and CVs should be increased from present 90 days to 365 days

- a. STV and CV, as prescribed in the TCPR have a limitation in terms of the maximum validity of tariff benefits which cannot exceed 90 days, except for Data only packs which are allowed for 365 days as well. The market has undergone many changes, especially post 2016, with the advent of tariffs with unlimited voice and per day data quota. Post opting for a tariff plan, consumers are now more familiar with and inclined towards recharging with packs i.e. STVs / CVs instead of changing their tariff plans.
- b. The 90 days restriction on the maximum validity of CV and STV is not aligned with present market needs. The increased validity of STVs/CVs will benefit consumers with a lesser number of recharges and also improve the Ease of Business.
- c. As such, flexibility in defining STVs/CVs with varied components is a necessity, as the limitation of maximum 90 days validity poses a huge barrier in aligning our product portfolios with the consumer segments, behaviours and usage patterns.
- d. We would also like to highlight the specific consumer requirement, basis which the Authority had felt the requirement of mandating a data STV of 365 days, vide it's TCPR, 10th Amendment dated 19.08.2016. In its explanatory memorandum, Authority had mentioned that one of the reasons for non-affordability of data offerings amongst the marginal consumers, was for the reason that these vouchers had a very short period of validity. Hence a maximum period of 365 days was mandated.
- e. Further, it was also mentioned that by allowing "data only" STVs to have validity up to 365 days, it would provide more flexibility to the service providers to offer innovative data products.
- f. Hence, by removing such restrictions in STVs/CVs, the same would be more beneficial for the consumers, as there would be more convenience for them, by recharging one time with a long



validity pack instead of four times in a year as well as reduced price-points. Similar example was observed during price revisions, where recharge of annual plans increased substantially.

2. VIL Submission:

Considering all above, we request the Authority to allow the increase in validity of STVs/CVs from existing 90 days to 365 days, in line with the validity for data only STVs, so that consumers can get benefited from such long validity STVs/CVs.

Question 5: In the current scenario, where dealers are doing recharge of vouchers online instead of selling physical vouchers. How relevant is colour coding of physical vouchers? Please justify with reasons.

And

Question 6: Whether colour coding can be introduced in digital mode to enhance consumer convenience and clarity? Please Justify your response with rationale.

VIL Comments to Question 5 and 6:

1. We would like to submit that there has been enough transparency in terms of the display of recharges, since there is a clear demarcation of voucher categories on the website, through which the customer recharge journey takes place. The different types of recharges are shown on our website basis the different categories of the recharges such as Top Ups, STVs, CVs & PVs. A screenshot of our website is as below:

The screenshot shows the VI website's recharge page. The browser address bar is 'myvi.in/prepaid/online-mobile-recharge'. The page features a navigation menu with options like 'Prepaid', 'Postpaid', 'New Connection', 'International Roaming', 'Utility Bills', 'Explore', 'Help', 'Business', 'Investors', and 'Sign In'. A sidebar on the left lists 'popular recharge packs' with sub-categories: 'hero unlimited', 'unlimited', 'ott', 'combo / validity', 'data', 'others', 'top up', and 'plan voucher'. A red arrow points to the 'ott' category. The main content area displays three recharge packs:

Pack Name	Price	Data	Validity	Buy Button
Premium Pack - Includes Hotstar	₹151	4 GB data	30 days validity	buy
VMTV Pro - Disney+ Hotstar, Sony LIV+ 12 OTTs	₹202	5 GB data	1 month validity	buy
Extra 5GB Data for 3 days	₹349	1.5 GB/day data	28 days validity	buy



2. This requirement was relevant earlier, when physical vouchers were in existence, however as on date the recharges are being done online or by the retailers digitally. In today's scenario, maximum the consumers prefer online mode to recharge, and hence color coding is not relevant, rather the MRP and the benefits are the major differentiator for the consumers to opt for any recharge irrespective of the color coding.
3. In fact, if the color coding is introduced in digital modes then it would all the more create confusion for the customers. Therefore, we strongly urge the Authority to do away with color coding entirely as it is no longer relevant in today's market condition.

Question 7: In the present situation where recharge of vouchers is carried out through digital mode, is there any relevance of reserving denomination of Rupees Ten and multiple thereof only for Top up Vouchers. Please Justify with reasons.

And

Question 8: Whether all types of vouchers can be allowed to be offered in any denomination of the choice of service provider? Please Justify along with rationale.

VII. Comments to Question 7 and 8:

1. Presently, only Top-up vouchers are allowed to be offered in the MRP of Rs 10 or multiple of Rs 10. All other vouchers i.e. STV, CV, PV have to be offered in denomination other than Rs 10 and its multiples.
2. With the STV/PV/CV recharges at all time high and dependence on top-up voucher reducing substantially, it is important that the denomination of Rs 10 and its multiple should be opened up for the STV/CV/PV recharges as well.
3. Allowing recharges with the denomination of multiple of Rs 10 across all voucher categories, will help consumers in following two ways:
 - a. **Ease of paying money** where consumers are recharging through retailers e-recharge facility. In such case, consumers can pay the amount in full, without any issue of balance.
 - b. **Ease in recollection of MRPs of a STV/CV/PV**, as the denomination of Rs 10 is easily and quickly understood.
4. Thus, the present market dynamics require allowing STVs, CVs, and PVs, to be offered in denominations of multiple of Rs. 10 in interest of consumers at large.



5. In view of the above, we submit time that there should be no pre-condition attached w.r.t. using MRP of Rs 10 or its multiple for any type of recharge vouchers. However, if the Authority still feels necessary to keep some MRPs in multiple of Rs 10 reserved exclusively for Top-up vouchers, then MRPs of Rs. 10, 20 and 50 can be reserved for top-up vouchers only, while allowing other denominations in multiples of 10 for any of the recharge voucher category.

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