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CONSUMER CARE SOCIETY®
593, 24th Cross BSK II Stage, Bangalore-560070
(Regd.under Karnataka Societies Regn. Act. 1960, Regn. No: 388/94-95)

President:	Secretary:	Treasurer:
G S Gundu Rao Tel.: 26717338	Ravindra Nath Guru Tel: 26713616 M-9845683220	K C Aswathanarayana Setty Tel.26760610

Sh Raj Pal, Advisor (ER)
Telecom Regulatory Authority of India
New Delhi
Email:<eco@traai.gov.in>

Date 5th November 2010

Dear Sir,

Subject: Comments on TRAI No. CP 12/2010 date 13 October 2010

Here are our comments on the above CP

CHAPTER 4 ISSUES FOR CONSULTATION:

1. What, according to you, are the challenges which Indian telecom subscribers face while understanding and choosing the tariff offers?

Comments: Too many choices and introduction of additional tariff offers makes understanding their implication very difficult, almost impossible.

2. What according to you are the required measures to further improve transparency in tariff offers and facilitate subscribers to choose a suitable tariff plan?

Comments: Limiting the maximum number of such tariff offers available to the customers to say ten. In addition they can be separately classified as say

“ For medium business users”

“ For large corporate business applications”

“For small individual users”

and so on so that users can closely examine from among these categories and select the most suitable one

3. Do you think mandating “One Standard Plan for All Service Providers” particularly for the prepaid subscribers as suggested by some consumer organizations would be relevant in the present scenario of Indian telecom market?

Comments: Do not think so even though this has the advantage of simplicity, particularly in the regime of mobile number portability. Moreover this would restrict the freedom of service providers. If broad categorization as suggested in para 2 is implemented, this issue may become simple

4. Do you think the existence of large number of tariff plans and offers in the market are beneficial for the subscribers?

Comments: Do not think so. If broad categorization as suggested in para 2 is implemented, this issue may become simple

5. In your opinion is it necessary to revise or reduce the existing cap of 25 on the number of tariff plans on offer? If so, what would be the appropriate number?

Comments: Yes, definitely. It seems Ten would be a good compromise

6. Should there any limit be prescribed on the rates for premium rate SMS and calls? If so, what should be the norms for prescribing such limit?

Comments: A definite "NO". Any rate or tariff should be on the basis of resources spent by the service provider and no other consideration. The danger of creating such artificial category is, like some airlines selling only a very small percentage of tickets at a throwaway rate and thereafter increasing tariffs for others. If such categorization is let into the Telecom tariffs, then it will encourage and result in malpractices. We remember when shortages were the norm, we used to have from trunk calls lightning, urgent and ordinary and so on and ordinary categories never materialized. Customer was compelled and milked due to his helplessness.

7. If not, what further measures do you suggest to improve transparency in provision of the premium rate services to prevent the instances of subscribers availing such services without understanding financial implications thereof?

Comments This problem does not arise at all We do not understand why "premium" There should be only one category

8. Do you think there is sufficient justification to allow the service providers to realign the ISD tariff in respect of existing lifetime subscribers in view of the grounds mentioned in their representations?

Comments No comments

9. What measures do you think are necessary to improve transparency and to prevent instances of un-intended recharges by subscribers in situations of cross-restrictions of recharges?

Comments We do not clearly understand the issue for consultation, hence no view.

10. Considering the nature and structure of the prevailing tariff offerings in the market and advertisements thereof, do you think there is a need for TRAI to issue fresh regulatory guidelines to prevent misleading tariff advertisements?

Comments: Definitely yes.

11. Do you agree that the instances of 'misleading' tariff advertisements listed in this paper adequately capture the actual scenario in the market? If not, provide specific details.

Comments: Yes, we agree.

“Any Other issue we feel is relevant to the consultation and give their comments thereon”.

From the CP- Reference: Paragraph C xx. onwards page 8 and Para B 1.29 page 29 and onwards.

We have noted that this issue is common to many developing telecom markets also. Under these conditions, we strongly believe that it is essential TRAI recognizes the importance of encouraging the consumer advocacy groups also to participate, understand, learn and effectively put forth many issues of concern to the Indian telecom users at such conferences and provide them, at least some selected once among them, all opportunities to interact with their counterparts in other countries as well. In fact we would very strongly urge TRAI to take positive steps to initiate such a conference in India at a very early date.

We hope you will find our comments a useful input in your ongoing studies. Please acknowledge.

Regards

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Sh Raj Pal, Advisor (ER)
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Date 15th November 2010

Dear Sir,

Subject: Comments on TRAI No. CP 12/2010 date 13 October 2010

Here are our comments on the above CP in continuation of our earlier comments dated 5th November 2010. Earlier comments precede. **Changes/ additions suggested in this mail are highlighted in yellow color**

CHAPTER 4 ISSUES FOR CONSULTATION:

1. What, according to you, are the challenges which Indian telecom subscribers face while understanding and choosing the tariff offers?

Comments: Too many choices and introduction of additional tariff offers makes understanding their implication very difficult, almost impossible.
Hence there is a need to reduce these to a minimum.

2. What according to you are the required measures to further improve transparency in tariff offers and facilitate subscribers to choose a suitable tariff plan?

Comments: Limiting the maximum number of such tariff offers available to the customers to say ten. In addition they can be separately classified as say
"For medium business users"

"For large corporate business applications"

"For small individual users"

and so on so that users can closely examine from among these categories and select the most suitable one

If we have ten plans and there are say 8-10 service providers in a service area, then in all it will be 80-100 which is a very unmanageable number to understand and chose the best.

We believe that only a much less number may be in wide use and the rest are simply dormant and hence should be removed. Hence TRAI may please review and reduce the number to a easily manageable number of say 3-4.

However for prepaid category which is about 95 plus% of the total subscriber base and used predominantly by less economically stronger segment (and contributing the maximum revenue) having too many options will be a great disadvantage. Hence a single plan is far more preferable. The advantage is there will be no confusion and easy to understand. A few service providers are already having only one plan for prepaid class and this should be considered the norm.

3. Do you think mandating “One Standard Plan for All Service Providers” particularly for the prepaid subscribers as suggested by some consumer organizations would be relevant in the present scenario of Indian telecom market?

Comments: Do not think so even though this has the advantage of simplicity, particularly in the regime of mobile number portability. Moreover this would restrict the freedom of service providers. If broad categorization as suggested in para 2 is implemented, this issue may become simple

We have thought over this issue again and would like to strongly support “Mandating “One Standard Plan for All Service Providers” particularly for the prepaid subscribers” would be a big advantage. Further in the MNP regime this will be greatly welcome.

4. Do you think the existence of large number of tariff plans and offers in the market are beneficial for the subscribers?

Comments: Do not think so. If broad categorization as suggested in para 2 is implemented, this issue may become simple

We “think the existence of large number of tariff plans and offers in the market” are not really beneficial for the subscribers.

5. In your opinion is it necessary to revise or reduce the existing cap of 25 on the number of tariff plans on offer? If so, what would be the appropriate number?

Comments: Yes, definitely. It seems Ten would be a good compromise
This figure of ten is by itself large and hence it should be further reduced.

6. Should there any limit be prescribed on the rates for premium rate SMS and calls? If so, what should be the norms for prescribing such limit?

Comments: A definite “NO”. Any rate or tariff should be on the basis of resources spent by the service provider and no other consideration. The danger of creating such artificial category is, like some airlines selling only a very small percentage of tickets at a throwaway rate and thereafter increasing tariffs for others.

If such categorization is let into the Telecom tariffs, then it will encourage and result in malpractices. We remember when shortages were the norm, we used to have from trunk calls lightning, urgent and ordinary and so on and ordinary categories never materialized. Customer was compelled and milked due to his helplessness.

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8. Do you think there is sufficient justification to allow the service providers to realign the ISD tariff in respect of existing lifetime subscribers in view of the grounds mentioned in their representations?

Comments No comments

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Comments: Definitely yes.

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Comments: Yes, we agree.

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counterparts in other countries as well. In fact we would very strongly urge TRAI to take positive steps to initiate such a conference in India at a very early date.

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