

Response to Consultation Paper on Review of Telecom Consumers Protection Regulations (TCPR), 2012

Introduction : The remarkable changes that happened in the telecom sector during the past 8 years has ensured the telecom service providers (TSP'S) no longer provide a base tariff plan with free incoming calls & SMS service and it is rarely discussed.

I appreciate TRAI for initiating something in that direction but I also request to push for immediate changes to the current tariff structure. I also request TRAI to not interpret fewer comments as a sign that it doesn't affect many people because the affected people may not have the awareness or means to express their concerns.

While it is unreasonable to expect a free service particularly from private companies, it is also unfair that the consumers don't have an option to just pay for what they want without being forced into bundled plan which includes services which they never use or be able to use.

I would like to give my opinion on the section : **choice of tariff availability.**

I will provide a combined response to both questions (Q1&Q2), as they are closely related and can be addressed together.

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.

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.

Response : I think the current tariff plans in no way align with the desired preferences and usage patterns of about 30 crore consumers which is about 25% of the total wireless telecom service consumers. There are more than 20 crore 2G users in the country and apart from a tiny fraction of them, none of them use or can use data services. There are several reasons for this and is likely to stay the same for atleast a decade or more due to the digital literacy of the said individuals. What plans do the TSP's offer for these kind of individuals? Nothing.

If you talk about senior citizens, only a few of them need a data service. Most of them just need a voice service so that they can stay connected with their family & friends. Some of them can't even make outgoing calls. But they have no such plan which offers what they need.

There are certain smartphone users too who don't use a data service but are forced to pay for a plan which includes it.

The current tariff structure maybe only beneficial to someone who prefers a daily data plan. Even within data bundled plans there is an indirect push by the TSP's to force consumers to consume more data. One reason could be their vested interests with the streaming companies/businesses which explains some of the plans bundling subscription to some streaming platforms.

The TSP's for the above reason also started offering unlimited 5G(in the name of testing the network) to a particular set of consumers by discriminating them by the devices(5G supported) they own even though same price is paid by other consumers.

I think there is a dire need for separate plans which don't bundle data service.

With constant push of associating a citizen with a mobile number for availing various services related to Aadhaar, PDS ration, LPG, Medical, Subsidies, Banking it can be assumed that the mobile number to be an essential for every citizen. It is only natural to expect such service to be affordable to all such citizens.

But from spending nothing to receive incoming calls & SMS 8 years ago a citizen is being forced to spend about ₹200 per month to stay connected on his mobile number.

This makes it **compelling to have a voice & SMS only plans and even a plan which offers only incoming services so that a citizen (particularly the poor) can stay connected.**

An argument can be put forward that a public sector undertaking TSP has voice & SMS only plans. But many of the consumers in other networks may not have the awareness to avail Mobile number portability service nor do they have the means to upgrade by replacing their working 2G device for a private TSP's network locked feature phone.