

To,
Advisor (F&EA)
Telecom Regulatory Authority of India
Mahanagar Door Sanchar bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi-02

No Regln/ 4-18/2015/ 9664

Dated: 15-01-2020

[Kind Attn: Shri. Kaushal Kishore]

Sir,

Subject: BSNL comments on TRAI Consultation Paper on "Transparency in Publishing of Tariff Offers"

Kindly refer to the TRAI Consultation paper no.20 dated 27-11-2019 on "Transparency in Publishing of Tariff Offers". The point-wise reply on the consultation paper is as below:

Q1: Whether TRAI should prescribe any format for publishing tariff? Please support your answer with rationale.

BSNL reply:

Prescribing a format for publishing tariff will restrict creativity in publication as every tariff plan has its own USP that cannot be standardised in a single format. There shall be many aspects of tariff that cannot be limited in a set of format or if the format is made lengthy with too much information, it will be difficult for subscribers to comprehend.

However, publication of tariffs on TSPs website is already standardised to make it transparent for customers.

Q2: If the answer to the Question 1 is yes, then please give your views regarding desirability of publishing tariffs on various modes of communication viz., TSP website/Portal, App, SMS, USSD message, Facebook, WhatsApp, Twitter, Customer care centers, Sales outlets etc. If the answer to the question is that tariffs should be published on multiple channels as above, please state whether TRAI should prescribe a separate format for each channel. Please also suggest the essentials of the format for each channel

BSNL reply: Not Applicable

Q3: Whether the extant format prescribed for publishing tariff at TSP's website conveys the relevant information to consumers in a simple yet effective manner? If no, please provide the possible ways in which the same can be made more effective?

BSNL reply: Yes, the existing format prescribed for publishing tariff at TSP's website conveys the relevant information to consumer in a simple and effective manner.

Q4: Whether the service providers be required to publish all the tariff offerings and vouchers in addition to the publishing of tariff plans, in the prescribed format? Please provide rationale for your response.

BSNL reply: Yes, for the sake of transparency and consumer awareness, all tariff offerings and vouchers should also be published on various platforms.

Q5: Whether there is a need to mandate TSPs to introduce a tariff calculator tool to convey the effective cost of enrolment and continued subscription? If yes, what can be the essential features of such a tool? If the answer is in negative, then please give reasons for not mandating such a tool.

BSNL reply:

Yes, incorporating an innovative tariff calculator may facilitate the consumer to understand tariffs and plan and to choose most appropriate offer as per their usage. Introducing tariff calculator will bring transparency in the system and help customers to make wise choice of tariff plans.

With respect to essential features of the tariff calculator, customer may select the desired telecom service (GSM / Basic / Broadband) followed by option of first recharge / validity extension or migration. Subsequently the TSP can calculate based on the cost of enrolment, security deposit (if any), SIM cost or SIM replacement cost, Cost of Tariff Plan voucher etc.

Q6: Whether the service providers be asked 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? If yes, what should be the exact details that service providers may be required to provide in case of bundled offerings? If the answer is in negative, then please give reasons for not mandating such a disclosure.

BSNL reply: Yes, service providers should be asked to disclose clearly the implication of discontinuation of tariff plans after expiry of the 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.

Q7: Whether the service providers be required to provide a declaration 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 disclosed here? Do we require additional measures to ensure that all the terms and conditions are clearly communicated to the subscribers and the Authority? If the answer to the above is yes,

then please provide your suggestions in detail. If you do not agree with the above requirement, please provide detailed reasons for the same.

BSNL reply: Yes, TSPs should be required to give declaration while reporting the tariff to TRAI and displaying tariffs through its various channels that there are no terms and conditions applicable to a tariff offering other than those disclosed here. This requirement is evident from the fact that FUP are not being mentioned by dominant TSP in their tariff details on Facebook, WhatsApp, twitter or print media, but are actually applicable in said tariff.

Q8: Whether the service providers be required to publish details of all plans in the prescribed format including the plans not on offer for subscription but active otherwise? Please support your answer with rationale.

BSNL reply: Yes, such plans should be published on TRAI web portal as well as on TSPs portal with a separate link provided on the tariff plans page. However, this practice should be made effective from the current date of implementation mandated by TRAI for those plans that will be closed in future. Means, this should apply for tariff plans which are rendered as CLOSED from date of implementation and NOT for the tariff plans closed in the past.

Q9: Whether the service providers be required to update the information on point of sale and retail outlets simultaneously with the launch/change of a tariff offer?

BSNL reply: Yes, the service providers should be required to update the information on PoS and retail outlets with launch / change of a tariff offer. However, the communication of the same would be possible through digital medium only. Printing of updated tariff plans at PoS would not be feasible on short notice and frequent changes.

Q10: Whether the tariffs published in prescribed formats are displayed on websites of the service providers in an effective manner? If no, should the manner of display on website may also be prescribed by the Authority? If it is felt that the manner of display on website may be prescribed by the Authority, please give your views on the proposed display framework.

BSNL reply: The tariff plans are already being published on TSP's websites in the formats prescribed by TRAI. For other tariff products, as conveyed in comments at point no. 1; setting a format would limit the conditions and specific details of a tariff product. However, a standardization with respect to aesthetic display can be prescribed by TRAI i.e. the proposed framework should be in form of a grid clearly specifying the freebies, details, applicability and conditions. Such visual display of tariffs in form of grid would also ensure proper understanding by customers.

Q11: What are your views on introduction of concept of unique id and requiring the service providers to link the tariff advertisements etc. with corresponding tariffs published in TRAI prescribed formats including requirements to publish dates of implementation of

tariff and that of reporting of tariff? Do you think that any other safeguards need to be introduced? If yes, please elaborate. Please support your answer with rationale.

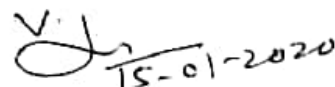
BSNL reply: BSNL agrees with the introduction of concept of Unique ID and linking the same with the tariff advertisements. Although, it is suggested that the Unique Record Id (which is allotted to a tariff product while filing on TRAI server) be employed for this purpose. The TRAI's Unique Record ID should be present on the TSP's websites and any other medium where the tariff product is being published / referred. The utilization of TRAI's Unique Record ID would further ensure consistency with reporting of tariffs and ease for customers to identify the tariff products clearly.

Q12: Whether the proposed monitoring and compliance mechanism is enough to deter any violation of compliance with applicable regulations/directions. If no, please suggest further safeguards that may be introduced to ensure a robust monitoring and compliance mechanism.

BSNL reply: Yes.

Q13: Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

BSNL reply: All the tariff to retail customers or special group of retail customers should be reported on TRAI website and accessible to common public for information.


15-01-2020

(Ved Prakash Verma)
AGM (Regulation-II)