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Subject: COAI Response to TRAI Consultation Paper on 'Review of extant provision for sending the printed bills to consumers of landline and Post paid Mobile subscribers'

Dear Sir,

This is with reference to the TRAI consultation paper on 'Review of extant provision for sending the printed bills to consumers of landline and Post paid Mobile subscribers', released on November 15, 2018.

In this regard, please find enclosed COAI response to the consultation paper.

We hope that our submission will merit your kind consideration and support.

With Regards,

Yours faithfully,

Rajan S. Mathews
Director General



Response to the Consultation Paper on 'Review of extant provision for sending the printed bills to consumers of landline and Post paid Mobile subscribers' released on November 15, 2018

COAI welcomes the opportunity to comment on the TRAI consultation paper on 'Review of extant provision for sending the printed bills to consumers of landline and Post paid Mobile subscribers'.

Our issue wise response has been given below:

Q (i). As per the extant provision of TTO (46th Amendment), provision of hard copy of the bill or printed copy of the bill to postpaid subscribers is mandated as a default option. Is there a need to change the extant default option, i.e., provision of paper bill without any charge to postpaid subscribers of Wire line and (ii) Mobile services? Kindly support your answer with rationale.

And

Q (ii). As against the existing practice of issue of printed bill to postpaid subscribers of (i) Wireline and (ii) Mobile service, unless a subscriber opts for electronic-bill (ebill), should e-bill now be made the default option? And if so, why?

1. Government of India has embarked upon the mission towards Digital India. The mission has gained the much required momentum due to Government efforts for cashless transactions after the demonetization exercise. The availability of affordable smart phones has also provided the much needed boost. For telecom sector, the digital transactions are being encouraged. For example, e-KYC route for subscriber verification and online payments of Government fees through Bharat Kosh project have been implemented. Even after the Aadhaar judgment, Operators were willing to continue the digital mode of subscriber acquisition/verification process and with the support of DoT came out with an alternate digital solution of Aadhaar instead of going back to old paper based subscriber acquisition/verification process. In this context, the introduction of default option of electronic bill (mobile bill or e-mail bill) for the postpaid subscribers would provide a much needed boost to the Government of India's efforts towards digitalization.
2. With the introduction of 4G services in India and availability of cheaper Smart Phones supporting 4G services, the proliferation of Internet and Broadband has been increased manifolds. Today more than 512 Million customers are using Internet Services out of which around 447 million customers are broadband subscribers. Similarly, the total



number of smart phone users in India has estimated to reach 337 million by end of 2018, and will be around 500 million by year 2022 as per the reports¹.

3. Further, the corporate customer base of the TSPs has the access to broadband services and has e-mail IDs as well. Similarly, most of the wireline subscribers (individual) usage the wireline services along with the broadband services offered by the TSPs and hence e-bills can easily be made available to such subscribers.
4. Other Public Utility sectors e.g. Electricity, Water, Gas connections (PNG), airlines, railways are using to send the bills/tickets/invoices to the subscribers through electronic medium. The effort of the companies involved in providing these services would have definitely saved a lot of trees which would have been consumed in order to print these bills. Telecom Sector has always supported any initiatives to support the Green Environment and their effort to reduce the carbon footprint is an example for other Industries. Introduction of e-bill/m-bill will be another initiative in that direction.
5. Further, with the type of post paid plans where customers are getting free callings and unlimited data at a fixed price, subscribers are aware of the amount they would be paying every month and not worried much about going into the details of the Bills. Thus, with changing behavior of the subscribers, it seems unnecessary to send printed copy of Bills (minimum 4-5 pages) wherein most of the subscribers are only interested to know how much they are required to pay.
6. TSPs have their own Mobile Apps where subscriber can not only view the various plans available, but can also view the details of their postpaid bills. Considering the proliferations of Smart Phones with availability of very affordable data services, mobile apps of the operators are becoming one stop solution for the subscribers.
7. **In view of the above, we strongly support that the extant provision relating to printing of post paid bills for wireline and wireless subscribers should be amended and the electronic format (e-bill/m-bill) should be made a default option along with the opt-in choice for the subscribers to receive printed copy of the Bill.**

Q (iii) If e-bill is made default option then how the bills would be made available to Postpaid subscribers of (i) Wireline and (ii) Mobile services with (a). Subscribers of Feature phones and (b). Subscribers who do not have e-mail facility.

1. As stated earlier, e-bill should be made a default option for both wireline and mobile post paid subscribers. In case the subscribers do not have the email facility then the bill can be sent in the form of M-bill SMS on their mobile number in case of mobile

¹ <https://dazeinfo.com/2018/05/07/smartphone-users-in-india-2018-2022-growth/>



subscribers and on the registered mobile numbers of wireline subscribers. The features of the M-bill SMS are:

- The M-bill would contain all the relevant fields required by the customer for verification of the bill. Details are given below:

The following fields can be shown in a mobile bill:

- (i) Mobile number
- (ii) Bill period
- (iii) Bill date
- (iv) Current month due
- (v) Previous balance
- (vi) Due date

Further, there would be options to see additional details such as;

- (vii) Monthly rental
- (viii) Usage charges
 - (a) Call charges
 - (b) VAS
 - (c) Internet usage
 - (d) Roaming
- (ix) Taxes
- (x) Total monthly usage ;
- (xi) Over due amount;



- (xii) Late payment charges;
- (xiii) Total due
- (xiv) Last payment

The sample SMS will be as follows:

“Bill for 9910030098: Bill Date: 09-Dec-16, Due Date: 27-Dec-16. Prev Due: Rs (-160.25) Payment: 0; Total Due: Rs 1679.27; This month bill: Rs 1839.52; Rental: 1599 ; Usage: 0.59 ; Tax: 239.93 ; For details click link to open bill details The M-Bill SMS can have a link which will take customer to his/ her E-Bill details.

- For subscribers with no data connectivity, SMS service can be provided. This SMS shall provide the same E-Bill details as available on the link. In case of basic feature phone, where all the details cannot be provided through one SMS, options can be given to the subscribers to reply with some code or number for more details on a particular short code. Similar to the SMS services, USSD mode can also be used specially for feature phone where a subscriber can initiate a USSD session through a string (e.g. *1234*#) and can further chose different option during that session to access the desired information regarding their post paid bill.
- With the introduction of M-bill SMS, we can provide paper less option to receive the telephone bill for all the categories of postpaid customers as reflected below:

Sr no	Category	Bill Option 1(email)	Bill Option 2(M-bill)	Remarks
1	Customers with e mail address, smart phone and data connection	√	√	Both the options available to the customer.
2	Customers with smart phone and data connection (no email)	x	√	Customer can download the bill over his phone also.
3	Customers with e mail, feature phone and data connection	√	√	Since the HTML page is a simple page, customer can view the data over phone also.



4	Customers with feature phone, data connection and no email facility	x	√	Since the HTML page is a simple page, customer can view the data over phone also.
5	Customer with feature phone with no email and no data connection	x	√	

- Further, customers (wireline or mobile) will always have the option to opt for the printed bills.
2. In all cases, customer can always visit the stores of the TSPs to view/get the printed copy of their bills. **Hence, we would once again like to request that the electronic bill (email/M-bill) should be made the default option. TSPs have the mechanism to ensure that all the necessary details of the post paid and fixed line bill can be provided/ accessed to/by the subscribers in the form of e-bill/m-bill.**

Q (iv) If a subscriber opts for e-bill and requests for change the option to printed bills, will there be a charge for providing the printed bill? Kindly provide reasons for your answer.

And

Q (v) What could be the safeguards for subscribers who do not wish electronic bills and prefer to get printed bills?

1. In case the subscriber opted for printed bill or do not wish electronic bills, the same will be provided to the subscribers by the operators.
2. Further, subscribers will have the option to opt in the printed bill or receive the printed bill for a particular bill cycle by placing a request with their operators through various modes e.g. call center, operators' apps, walk-in stores etc.
3. **We submit that no issue will be faced by the subscribers if the electronic bill will be made as a default option. Any subscriber wishes to receive printed bills can always opt in for that option.**
4. **Further, TSPs may charge a nominal fee for printed bills to encourage the subscribers to opt for e-bills. The subscribers with non-data supporting feature phones and persons with disabilities, who are specifically opting for printed bills, can be kept out of this nominal fee.**



Q (vi) TRAI has mandated specified set of information to be printed on bills to postpaid subscribers. If the printed bill is not issued, then how the specified set of information will be conveyed to subscribers? Should the same be mandated for e-bills also? Kindly support your comments with justification.

1. In our response to Q (iii), we have highlighted the fields of the post paid bills the subscribers will received through E-bill through email, subscriber gets exact the same set of information as provided to them on a printed bill.
2. **Thus, the specific information required in a post paid bill is being provided by the operators to their subscribers and TRAI should amend the extant regulatory provision of providing the printed bill and make the electronic bill a default option.**

Q (vii) Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

1. Recently, from the media articles², we have noticed that one of the associations relating to paper industry has opposed the shift from paper bills to e-bill/m-bill.
2. We strongly refute any such statement which opposes the introduction of digital means to access any services. We would like to submit that the recycled papers which might be used to print bills can be made useful for printing of newspapers, magazines, note books etc. By the year 2016, the total count of registered publications reached to 110,851 according to a report, 'Press in India 2015-16,' prepared by the Registrar of Newspapers of India (RNI)³. Out of the total print media publications, 16,136 were newspapers, while 94,715 were registered as periodicals. The Indian print industry continued its growth story at a steady rate of 5.13% over the previous year, and the recycled papers can easily be consumed in this industry which is growing with a steady pace. Thus, any claim of loss to paper Industry is unauthentic and should not be considered.
3. Further, Government has taken various steps to make many application processes e.g. passport, PAN Card, voter ID card, driving license, CGHS cards, public grievances etc.

² <https://www.thehindubusinessline.com/info-tech/telecom-operators-concerns-over-paper-bills-unwarranted-ipma/article25550167.ece>

³ <https://www.livemint.com/Consumer/T5wzR3rskQ4TSsBQFQJmcJ/Print-media-publications-in-India-grew-at-513-in-201516.html>



online, not only to make the processing time lesser but also to reduce the use of papers. DoT has also taken steps for automation of processes like SACFA clearance, LF payment etc. online. Saral Sanchar launched by DoT recently is another example of making the licensing process online thereby reducing the processing time and also saving the use of paper. These initiatives are continuously gathering pace and more and more government agencies are adopting the online mechanism. **Adoption of e-bill will also be in line with these digital initiatives and we are hopeful that TRAI will soon amend the provisions and pave the path for adoption of electronic bills.**
