

**Comments**  
**on**  
**Consultation Paper**  
**on**  
**Validity period of Tariff Offers**

**Question 1: Whether TRAI should intervene in the issue of validity period or allow the same to be under forbearance?**

Yes, TRAI should intervene in the issue of validity period of tariffs offers.

This is necessary for two important reasons,

1. The consumer is normally used to common time period that is generally applicable to his other areas of life, of a day, week, month and an year. Almost all payments made of utilities, fees and salaries all follow these time periodicities. Many prepaid consumers have expressed their failure in making the recharge due to their inability to monitor their due date as it varies and as a consequence experience blockage of telecom services.

2. The Telecom Service Provider (TSPs) disingenuously have basic plans and vouchers of varying time period in addition to the industry's standard time validity of 28 days, 56 days, 84 days and 365 days. This multiple time validities confuses the consumer leading imprudent and poor decisions.

For example Reliance JIO has 3 plans for around an year with different validity period of 336 days, 365 days and 360 days. It has 4 data voucher of validity period of 120 days, 180 days, 240 days and the active plan period.

In case of Vodafone Idea there a plethora of plans with different time validity. These are 24 days in recommended plans and 2 days, 18 days, 20 days, 70 days, 77 days, 180 days among the unlimited plans. In Combo Voucher they have another time validity of 14 days in addition to the standard 28 days and 56 days.

AIRTEL has 2 more recommended plans other than the usual time validity of 2 days and 24 days.

**Question 2: If the answer to the Question 1 is yes, then whether the TSPs be mandated or merely advised to offer tariff (for PVs, STVs and CVs) for a specified duration?**

Mandated. Otherwise the TSPs will resort to circumventing the advisory to again offering plans of different time validity period.

We feel that in addition to the PV, STVs and CVs, the TSP should be permitted ONLY to offer any benefits or promotional or other brand subscriptions for the same time periods that are mandated by TRAI.

**Question 3: Whether the period to be specified should be considered as 30 days or a month with requirement of tariff to be renewed only on the same date of each month or separate tariff offers be mandated for 29/30/31 days in addition to the present practice of offering tariff for 28 days?**

The period specified should be a month with the plan be renewed on the same date of each month.

With that change there is NO need for tariff offer for 28/29/30/31 days.

**Question 4: Whether on the lines of a monthly offering, the other periods viz., quarterly, half-yearly and yearly prepaid tariff offerings be mandated or just the monthly offerings be required?**

We suggest that the following time period of offer be mandated and hence standardised across the different service providers.

1. 2 days/Weekend
2. 7 days (week)
3. Month (date to same date next month)
4. Quarterly (date to same date after 3 months)
5. Half-yearly (date to same date after 6 months)
6. Yearly (date to same date after 12 months)