

**CONSUMER PROTECTION ASSOCIATION
HIMMATNAGAR
DIST. : SABARKANTHA
GUJARAT**



**Comments on
Transparency in Publishing of Tariff Offers**

Introduction :

Active consumer behaviour is a key condition for healthy competition to exist in a market. By searching out offers in terms of price and quality, comparing them, switching between providers or negotiating a better deal with an existing communications provider, consumers can influence the market in many ways. Furthermore, some consumers play an important role in giving advice about services, providers, prices and quality to other consumers, enabling them to make better informed choices.

If consumers cannot switch easily or buy new services because they do not have the right information, competition does not deliver the intended benefits. In addition, where vulnerable groups of consumers cannot engage in the market, they may fail to benefit from competition or new services that others take for granted.

It is sometimes difficult for consumers to find, understand and use the information available on the market in order to make decisions on the choice of service provider and/or tariff packages that best meet their needs. Regulatory intervention may therefore be appropriate to address the issue of deficient consumer information in its various forms including lack of information, unclear or hard to find information, misleading information or the “bounded rationality” of consumer decision-making.

Lack of transparency (the “end-user transparency problem”) means that end-users do not find it easy to make informed decisions and compare services. This may be because the information does not exist or is deceptive. It might also be because the information, consumers are presented with is complex, not easy to interpret and/or set out in a number of different places, which makes it difficult to interpret and/or compare.

Tariff transparency is mentioned as an area of concern in a significant number of countries. In particular, the difficulties experienced by end-users in comparing tariffs seem to be a matter of concern.

Transparency problems can be generated and amplified by a variety of factors, including the increasing number and diversity of offers, the complexity of tariff plans, the bundling of services and the deficient presentation of information by service providers.

An information transparency deficit can affect end-users’ interests in a number of ways, irrespective of the manner in which this deficit is manifest (e.g. lack of information, misleading information, unclear or hard to find information,

or information which is difficult to assess and compare). End-users could face negative consequences –

- (i) They may pay more than they would need to,**
- (ii) They may buy a service which does not satisfy their needs and/or,
at the most extreme,**
- (iii) They may be excluded from participating in the market and consequently from the associated rights and benefits.**

This may, in turn, inhibit and dampen the competitive process. For consumers to engage effectively in the market and use their ability to vote with their wallet, they need to be able to move quickly and with the minimum constraint between service providers.

Such negative consequences can be prevented by giving consumers access to information which is relevant to their needs. Information practices can be divided into three categories, according to the party who is providing the information to end-users: -

- 1. Information methods/tools employed by service providers**
- 2. Information methods/tools implemented by TRAI**
- 3. Information methods/tools made available by third parties.**

Telecommunications advertising has great potential to misled consumers about the nature and characteristics of service plans, including the pricing.

We found that the deceptive advertisement effects on consumer loyalty in telecom industry. Consumers are using four variables, :

- (i) Call charges
- (ii) Network coverage
- (iii) Network quality and
- (iv) Customer service

to measure deception in telecom ads and then its effect on consumer loyalty while the consumer preference is used as the proxy of consumer. Testing specifications confirmed that the deception overwhelmingly exists in telecom ads and none of the telecom companies were providing exactly the same quality of service in terms of call charges, Network coverage, Network quality and Customer service as they promise in their advertisement, while, the consumers are inclined towards the services where the deceptions are seemingly merger.

This consultation paper is also useful for the service providers as word of mouth has a strong significant influence on customer loyalty. Hence customer satisfaction and customer trust are causing word of mouth in a positive and significant way. So it shows that there is a positive and strongly significant influence of customer satisfaction and trust on customer loyalty with the mediation of word of mouth. On the other hand, deceptive ads are causing word of mouth in a negative way. Hence it is concluded that deceptive ads have a negative influence on customer loyalty with the mediation of word of mouth. In order to increase customer loyalty and build a long-term relationship with the

customer's telecom companies should focus on accurate information and rendering the level of competitive services to their customers.

Question 1: Whether TRAI should prescribe any format for publishing tariff?

Please support your answer with rationale.

Comments :

Yes, TRAI should prescribe format for publishing tariff. Because :

1. Most of the advertisements are Contradictory, misleading by ambiguity and exaggeration, not clarifying the said benefits.
2. The advertisements are contravening the Advertisement Standards Councils of India (ASCI) Guidelines for Disclaimers.
3. Service providers are putting restrictions and the reminders in much smaller fonts.
4. The advertisements are not clear and transparent.
5. Service providers are using the word “ Unlimited “ which does not give true picture to consumers of what is being offered. The services had speed caps imposed on particular uses or after a certain data threshold was reached.
6. Service p providers should take their obligations more seriously.
7. Disclaimers are not sufficiently prominent or clear to explain to consumers the existence and impacts of the limitations.
8. Service providers falsely convey to consumers that they provide plans offering unlimited usage of its mobile network when, in fact its services, including mobile data services, were always subject to use limitations and exclusions.
9. The statements are misleading, untrue and confusing.

10. Advertisements are exaggerated, highlighting the benefits of the products which are not too important while concealing the drawbacks which are more important.
11. Consumers are facing a situation of lack of information, misleading information, unclear or hard to find information and information difficult to assess and compare in the marketplace which affects their ability to make an informed choice which serves their needs.
12. The advertisements are inadequately substantiated without any market/consumer research data or any verifiable comparative data of other Telecom Service Providers.
13. Consumers are often unable to find out, or are not aware of, which tariff applies to their services. For example, when calling a premium rate number, consumers are not always adequately informed of the price involved or even of the type of service behind the number. Another example is that a mobile call to a number advertised as “free phone” may not be free.
14. Making price comparisons can be difficult for consumers, particularly in cases of service bundling.
15. **Increasing number and diversity of offers** – Increased competition and innovation in the electronic communications sector is delivering considerable benefits to consumers but is also bringing more service offers into the market, with new and diverse features. This increases the complexity of the marketplace for consumers and makes it difficult for them to compare and decide.
16. **Complexity of tariff plans** – The comparison of prices for electronic

communications services offered by different providers is complicated by the wide range of possible consumer usage patterns and the detailed variations in price levels and price structures (e.g. tariffs for on-net/off-net calls, calls to mobile/fixed networks, depending on destination, during peak/off-peak hours, towards favorite numbers, family options etc.), amplified by the large number of possible discount and bundled schemes available. Tariff plans usually have a variety of structures and discount schemes. Moreover, operators and service providers regularly adjust their pricing strategies either through changes in components of their tariff structure, or the introduction/withdrawal of various discount schemes and service packages.

In short, the wide range of tariffs and discount schemes available makes it difficult for consumers to calculate which tariff, from which supplier, offers the best deal or an improvement on their existing service. To make a fully informed decision, consumers would need to study a detailed breakdown of their call profile.

17. **Bundling of services** – The provision of bundled services – combining telephony/Internet/TV – offer lower prices, a single bill and new innovative services that are more tailor-made. But it also means that consumers face increasing complexity – not just in the number of communications services they buy but also in the complexity of each individual service. And, because each bundle has a different set of characteristics, this may make it difficult to compare offers. This is likely to increase with the development of next generation networks, which support the delivery of multiple services over

the same technological platform and thus are likely to boost the take up of bundles.

18. **Deficient presentation of information by service providers** – This could take many forms, including lack of/inadequate publication of information on tariffs and on other terms and conditions by service providers; lack of billing control tools; inadequate information on post-contract tariff changes; and many others.
19. Tariff complexity is also a key characteristic of broadband service packages. Tariff plans may differ in regard to the monthly fee charged, the upload and download speeds offered, the degree to which the speeds are “shaped” above a certain level, the amount of prepaid data provided as part of the plan, the tariff charged for excess data above the maximum allowance and the set-up fee involved.

Question 2: 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, Face book, Wats App, 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.

Comments :

More and more publicity of tariffs in a easily understandable language is needed for the consumer to choose proper plan and create awareness so it is

desirable to publish tariffs on various modes of communication viz. TSP website/Portal, Apps, SMS, USSD message, Face book, Wats App, Twitter, Customer care centers, sales outlet etc.. The publicity of the tariffs should be in a comparative manner.

There should be a mix of static and interactive instrument which should be regulated minimum contents.

Tools providing direct information to consumers in a targeted and personalized way can be complimented the general information requirements to be met by service providers.

Web based methods can be complemented by “ off-line” methods able to rah a wide audience especially where a material share of this audience may not have access to the internet.

TRAI should prescribe single format for all channels, which should be regulated, easily understandable and identifiable.

Implementation of such methods can empower end users, helping them make informed choices which best serve their needs.

The format should cover :

1. (i) Call charges
- (ii) Network coverage
- (iii) Network quality and
- (iv) Customer service
2. Wording should be added requiring that promotions using prizes must be ‘prepared with a sense of responsibility and comply with the spirit, not merely the letter of the format. This is an imprecise obligation.

3. More specifically, promotions with prizes should be communicated in a manner that is clear and readily understandable by the intended audience. In addition, promotions using prizes cannot create confusion between 'gifts' and 'prizes'. Presumably for 'gifts', there is no element of chance or competition involved.

Broadly categories of mandatory information must be :

- Standard tariff
- Indication of what is included in each tariff element
- Standard discounts
- Minimum contract period
- Coverage
- Speed
- Others.

Information which should be published by service provider must be :

- Up to date,
- easily accessible for most of the categories.
- Transparent
- Clearly understandable
- Well arranged
- Detailed
- Extensive or provided in a sufficient manner
- Comparable in present with regards to tariff and quality of service

Particularly when it refers to tariff.

Service providers must send an individual notification to subscribers via e.g. letter, SMS or e-mail with minimum 30 days in advance of the changes.

There is a need for tools able to provide **direct information to consumers in a targeted and personalized way** (via phone, letters, e-mails, SMS, interactive web applications etc.), as a complement to the obligations already imposed on providers to make available general information on tariffs and terms and conditions applicable to their services via websites or at the points of sale.

There is also a need to **improve consumers' knowledge about their own consumption profile**, e.g. by a report that can be provided once a year (in the bill or in a leaflet sent with the bill) on the average monthly consumption of different services during the previous year. This could help making comparisons between various offers more easily, including via the use of interactive price guides made available by TRAI or third parties.

Question 3: 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?

Comments :

Yes.

There should be some kind of general information dedicated to end-users on Service provider's website or on another website that they maintain. The information normally should cover mobile telephony, fixed telephony and Internet/broadband. There should be dedicated end-users information section on their website. Information targeted at end users might also be published under thematic areas for electronic communications services.

The published information should be about **possibility of switching between providers, end users' rights** in dealing with service providers, **how to complain and dispute settlement mechanisms** available, **what to look at when choosing a certain offer, generalities on tariffs and billing and special charging rules.**

Question 4: 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.

Comments :

Yes.

Conventional economic analysis recognizes that information asymmetry and information failure may lead to sub-optimal consumer outcomes. It recognizes that consumers face a “bounded rationality” (*e.g.* in processing information) and, as a result, rely on ‘heuristics’ (such as reliance on a firm’s reputation and other price and quality signals) in decision making. But such demand-side analysis indicates improved insights into actual consumer behavior that may exhibit systematic departures from the “rational” behavior assumed by conventional (neoclassical) economics. That is, even when presented with full information, consumers may not always be in a position to understand and/or use that information to their advantage.

There should be a comparative advertisement, which means advertisement that :

1. Makes a comparison with a competitor or a product or service of a competitor.
2. Comparative advertisement should be “ Clear and fair “
3. Objectively compare one or more material relevant verifiable and representative feature of those services.
4. The comparative advertisement should not “ unfairly criticize, discredit or denigrate “,
5. Refrains from “ Judgments and opinions “,
6. Must rely solely on objective statements and facts that can be clearly substantiated
7. Must address offers or services that are comparable.

Any footnotes, qualifiers or disclaimer (i.e. “ the small print “) in advertisements must be clearly visible and legible, audibly apparent and understandable. Such small print should not contradict, materially qualify, or otherwise alter the basis for the advertisement.

Question 5: 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.

Comments :

Yes.

We found that, one third of consumers did not use all the included minutes available to them. Notably, almost 20% of those on monthly users

claimed that they usually use less than half of their included minutes. By contract 40% of consumers declared that they usually use more minutes than those included in their package. This suggest that many consumers may either systematically over estimate usage level and choose plans with higher rental charges and more available minutes than they actually require or under estimate usage and end up paying significantly higher prices for additional minutes above those provided as part of the package they subscribe to.

Tariff calculator should be introduced to help consumers compute the effective cost of enrolment and continued subscription of a tariff plan. The tariff calculator should be able to offer the most optimal plan or voucher for subscription to a customer based on his input fed in the system around expected data usage, minutes of usage of outgoing voice calls, validity period etc.

Essential features of the tool should be :

1. Calculation of the cost of all services :
 - Basic Telecommunication services
 - Transit Services
 - Interconnection services
2. Calculation of service tariffs :
 - Cost based
3. Different tariff scenarios
4. Monthly subscription fees.

There should also be interactive web-based price calculator which can perform calculations based on preferred consumption volumes and rank subscription packages from different service providers according to their price. It

can be introduced directly or via the accreditation of third party initiative **without cost to the consumers**. It should cover :

- (i) the full range of electronic communication services,
- (ii) should be rich in features but at the same time
- (iii) display a particularly user friendly interface and
- (iv) attach significant value to the simplicity and
- (v) ease of the user experience.

An interactive and/or non-interactive offer comparison website maintained by a public body can also be established in which quarterly price comparisons, subscriptions and data services can included.

The accreditation scheme for price calculator website should provide quality assurance, for example by certifying that the price calculator offered by accredited websites are freely accessible, accurate, transparent and comprehensive.

The websites should be able to perform calculations based on the consumption volume indicated by the user, and deliver a list of the available subscription packages matching the user indications, arranged in the ascending order of their price.

The features included should be : domestic voice call, SMS, Data, Data speed, Video call, international and roaming services etc..

The language of the comparison website should be in National language, English or in local language.

The information on the details of offers should be provided/uploaded/updated on the service provider's websites on a voluntary basis. TRAI should act as a " gatekeeper ", by verifying the information and

activating it on the public website. Such like in other countries, heavy penalty should be imposed for noncompliance.

Question 6: 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.

Comments :

Yes.

The service providers should be asked to disclose clearly the implications of discontinuation of tariff plan after expiry of mandatory tariff protection period of six months.

Product bundling is a marketing strategy that involves offering several products and/or services for sale as one combined product. This combined product is offered at a discount prices, so that it is cheaper to buy the products and services as a bundle than separately. Bundling is generally implemented when the seller thinks that the characteristics of two or more products and services are such that these products might appeal to many consumers more as a package than as individual offerings. Actually bundling practices are a particular form of price discrimination.

Price discrimination generically refers to the ability of a service provider to sell its products at different prices so that the value per unit of the product differs across consumers. There are three types of price discrimination :

First type of price discrimination (or perfect discrimination) arise when the service provider charges the price corresponding to the willingness to pay for each unit to each consumer. Second type of price discrimination appears when a service provider links the price to the volume bought. Finally the third type of price discrimination links the price to some characteristic of the consumers (age, gender, income etc.).

Under this taxonomy, bundling practices are a manifestation of second type of price discrimination. Under these pricing scheme, different quantities are bought at different average prices, thus reflecting for instance, price discounts according to volume.

As the consumers are paying for the bundled plan, the service providers should 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.

Question 7: 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.

Comments :

Yes.

The declarant must have first hand personal knowledge of the information stated there in and authenticate all evidence attached to a declaration.

Strict action should be taken on violation.

Question 8: 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.

Comments :

Yes.

Details mentioned in elsewhere.

Question 9: 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?

Comments :

Yes.

Question 10: 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.

Comments :

Yes.

Question 11: 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.

Comments :

Yes with caution.

Unique ID for advertisement is a powerful device for collecting huge amount of detailed information about the consumer's lifestyle, location and habits – and it's tucked away right from the consumer's pocket. Each smart phone is uniquely differentiated from hundreds of millions of other smart phones by something called an ad ID. The technology allow to collect valuable insights about customer's spending habits etc. Data gathered from advertiser ID are also bought and sold many times over any may include some personal details.

In this mobile first world, advertiser ID tracking is growing fast and becoming increasingly sophisticated.

Even though, we support the Unique ID for advertisement with a close watch by the authority for privacy of the consumers as :

- Enable greater transparency and accountability in the advertising marketplace.
- Help eliminate costly errors associated with the inconsistent use of advertising asset identifiers throughout the advertising supply chain.
- Enable more granular audience measurement across multiple platforms.
- Easily accessible information.
- It has a standardize data
- It has a central source of information

Precautions :

- 1. Privacy and security policies must be strictly followed .**
2. It should respect user's selection regarding the ad tracking.
3. It should not be connected to personally identifiable information.
4. It should always respect user's intension.
5. It must not be connected to a previous advertising identifier or data derived from a previous advertising identifier without the explicit consent of the user.
6. It should always respect the associated personalized Ads flag.
7. It must abide the user's " opt out " interest.

If the user has enabled this setting, service provider must not use the advertising ID for crating user profiles for advertising purposes or for targeting users with personalized advertisement.

8. The activity should include contextual advertising, frequency capping, c

conversion tracking, reporting and security and fraud detection.

9. It should not misled or confuse the consumers.

Question 12: 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.

Comments :

No.

Behavioural economics challenges some of the presumptions of conventional economics that consumers make their choices coherently and rationally given their preferences and the constrain upon them. It argues that consumers can fail to act in their own best interest due to behavioral traits such as failure to process information objectively or misevaluations about the costs and benefits of prospective decisions. Among the biases identified by the behavioral economics, the following may be particularly relevant to the electronic communication market and may help to explain how, even where there is adequate information consumers may be making seemingly irrational decision in choosing an operator or service packages.

- **Choice overload** – Consumers who have too many products or features to compare may experience increased anxiety about the possibility of making a bad choice. This can lead to random choice, or failure to make any choice, resulting in missed opportunities for buyers and sellers. A type of “analysis

paralysis” can take hold when information and choice becomes very complex.

- **Endowment** – Consumers may be reluctant to give up what they have, even though they would not buy such goods or services if they did not already have them (e.g. consumers may stay with the incumbent fixed line provider because of misplaced loyalty, a failure to acknowledge poor choices in the past, or an irrational consideration of sunk costs).
- **Defaults** – The ordering of options, particularly in markets where a choice must be made, influences choice. A “default bias” could be identified, that is, the decision to opt-in or opt-out (for example, when extending a mobile phone contract) is not the same decision for people. Also, consumers may tend to take the path of least resistance, particularly if they feel that there is a ‘normal’ option (e.g. people may buy ‘standard’ bundles offered by service providers, even if they do not want the whole service bundle).
- **Hyperbolic discounting** – Consumers tend to be short-sighted when making decisions with immediate costs or benefits to be weighed against future costs or benefits. For example, consumers may enter long-term contracts because they place more value on the immediate benefits of the offer, such as a free or heavily subsidized handset or a reduced first month rate, rather than on the long term costs of a contract, such as high price for calls exceeding the usage limit of the subscription package (the “included minutes”), the inability to switch to lower priced alternatives, and the inability to take advantage of latest technology. The apparent acceptance of the high prices set for calls made beyond the usage limit may be one illustration of “hyperbolic discounting” by consumers who heavily discount

the prospect of such costs in the future. Providers can exploit consumers' underestimation of their future telecommunications usage by bundling airtime, handsets, and other services such as voice mail. The high long-term prices that consumers end up paying subsidize the free or heavily subsidized handsets, free calls and voicemail, etc.

■ **Framing biases** – Consumer choice is influenced by the “frame” in which information is presented. Presentation of the same information in a different “frame”, may lead to a different decision. For instance, cash back offers can be much more attractive to customers than a similar or even greater discount. For most consumers, “only 3% fat” is likely to be less appealing than “97% fat free”.

■ **Loss aversion** – The preference for avoiding loss is widely considered to be greater than the preference for gain.

■ **Heuristics** – Consumers often take short cuts (e.g. by following rules of thumb) when the decision environment is too complex for their mental and computational capabilities. These rules of thumb are called “heuristics” and are often accurate enough to be useful, but may sometimes lead to sub-optimal decisions.

1. TRAI should take strict action during the investigation of a complaint or an alleged breach of the advertising provisions, to issue ‘Temporary Instructions’. Such Temporary Instructions may include the obligation to desist temporarily in repeating the relevant advertisement or to take, or refrain from taking, any relevant steps the TRAI considers appropriate in the circumstances.

In deciding to issue Temporary Instructions, the TRAI should have regard to the complexity of the case, the likely impact on consumers, the telecommunications market and the strength of the available evidence. Consumer protection should be given paramount consideration in such cases.

Temporary Instructions should apply for such period as the TRAI may specify. Breach of the Temporary Instruction should constitute a breach of the Regulation.

2. In the event that any statement made by the service provider is misquoted in the media, then, to the extent that the misquote does or may result in an apparent breach of the Consumer (for example, the misquote is misleading about the terms of a special offer), the relevant Service Provider should be under a positive obligation to take reasonable steps to procure a retraction, correction or other appropriate action concerning the misquoted statement in the same medium in which the misquotation was published.
3. The regulation should be applied to any direct or indirect advertisement or any other activities which has the same or similar effect and relates to promotes, refers or relies on any service or person regulated under the TRAI Act. This broad refraining could include, for example, advertising on social media and even the seeding of positive comments online or trolling of competitor posts.

Question 13: Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

Comments :

There is a need to grant specific protection via appropriate information to end-users when making certain calls whose cost might be higher than they would normally expect. Various examples of such situations may be provided:

- ✓ high tariffs for calls to specific categories of numbers (e.g. premium rate services),
- ✓ high tariffs for off-net calls and sometimes very significant differentials between tariffs for on-net and off-net calls.

The introduction of number portability raised concerns related to the protection of end-users who make calls to ported numbers due to a combination of reasons: first, the associations previously established by end-users between numbering ranges and providers who have been allocated these ranges are losing their relevance in the number portability context; second, the variety of tariffing rules applied for calls to ported numbers (“number oriented pricing”, “network oriented pricing”, no common practices) and the calling charges differentials depending on the terminating network. Decisions aiming at increasing transparency in respect to calls to ported numbers or off-net calls were highly relevant in our country where the differences between off-net and on-net calls were significant and, therefore, consumers could have faced larger bills than they would have expected. Service providers should make available, on an either mandatory or voluntary basis, information on ported numbers (network and, in some cases, applicable tariffs), via phone, SMS or Internet.

To deal with these issues, a number of countries have introduced **voice announcements** or **acoustic signals** to notify the caller that he/she is calling a ported/off-net/special tariff number.

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