

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

Comment:

As per the Telecom Regulatory Authority of India Act, 1997 (“Act”) the Authority has been mandated as:

*“Notwithstanding anything contained in the Indian Telegraph Act, 1885 (13 of 1885), the Authority may, from time to time, by order, notify in the Official Gazette **the rates** at which the telecommunication services within India and outside India shall be provided under this Act including **the rates** at which messages shall be transmitted to any country outside India:*

*Provided that the Authority may notify different **rates** for different persons or class of persons for similar telecommunication services and where different rates are fixed as aforesaid the Authority shall record the reason therefor.” **[Emphasis Added]***

It is evident from the above provisions that TRAI (“Authority”) has the mandate for defining the rates only and not the validity period.

Hence, request the Authority to consider revising the rates under “Tariffs under forbearance”, which not only solve the issue of different validity period for different users but also make Tariff structure simple and comparable.

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?

Comment:

It is proposed that all TSP’s should be mandatorily directed to offer Tariff for a specified duration.

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?

Comment:

It is proposed that all TSPs should offer on “Same date of each month” (SDM). SDM is a same date for every month (i.e. every 1st Day of month, every 5th day of month etc.).

By keeping SDM as a recharge/ billing date not only eases customers to remember their respective ‘due date’ but it also helps TSP’s in managing their cash flow position streamlined.

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?

Comment:

Option to opt for more than one month will be given to a user/customers but on SDM only. The objective of simplicity and comparability should be encouraged across all TSPs.