

Dear Sir,

Greetings!

Please find our comments on Consultation Paper on Certain Issues relating to Telecom Tariffs

**Q-1) What, according to you, are the challenges which Indian telecom subscribers face while understanding and choosing the tariff offers?**

A-1) No. of prepaid tariff plans, more than being too many, are a major pain and source of confusion to the subscribers because their life-time (when they are expired and replaced with new ones) and frequency of introduction is sometimes mind boggling. On top of that, the limited period, promotional plans, add to the confusion. Often the vendors selling the new connection, or promotional offers, recharge coupons / e-topup, are themselves misinformed, or they try to sell what they have in inventory by distorting facts (or hiding facts) about plans, or one that will give them more economic benefit.

It is very difficult to compare two plans from different vendors, as the rating parameters applicable are not clearly highlighted.

When changes are done to existing plan and subscribers are offered to move to one of the other plans, some people feel that the sales-agent (call-centre people) adopt unfair means s.a. again giving partial information about new plan, the changed benefit levels, and seem pushy.

**Q-2) What according to you are the required measures to further improve transparency in tariff offers and facilitate subscribers to choose a suitable tariff plan?**

A-2) TRAI should instill regulations that mandate operators to --

1. Educate all of their vendors, retailers, agents, call-centre folks about the new plans, and how it compares with other existing plans.
2. When old plans are removed, a thorough cost/benefit comparison must be made available in english/hindi/vernacular language, in form of bold posters, to be displayed clearly at the shops / kiosks.
3. Such information as above should also be made available at operator's website
4. There should be mechanism to proactively seek such information by calling an IVR (either automated announcements) or worst case (confusion) talking to a customer service rep.
5. Track dealer inventory of recharge-vouchers / new SIM connection packages, s.t. there is a healthy inventory of those for each

tariff-plan.

6. Some think that it is only fair that when new plans whose cost/benefit factors are better, are launched, existing subscribers should proactively be offered a choice to move to it, and not wait for subscribers to find out about same.

**Q-3) Do you think mandating "One Standard Plan for All Service Providers" particularly for the prepaid subscribers would it be relevant in the present scenario of Indian telecom market?**

A-3) No. The market should determine the rate. If standardization is done across industry, we may never see revolutions s.a. 1ps / second call rates.

**Q-4) Do you think the existence of large number of tariff plans and offers in the market are beneficial for the subscribers?**

A-4) Existence of choice is always good, however if the information about choices is obscured, confusion prevails. Thus TRAI should either limit the number of tariff plans to a minimum (next answer), or ensure that operators are doing enough across the entire value-delivery chain, to ensure confusion is avoided and information is available with clarity.

**Q-5) In your opinion is it necessary to revise or reduce the existing cap of 25 on the number of tariff plans on offer? If so, what would be the appropriate number?**

A-5) If operators are willing to take greater responsibility and accountability for reducing confusion around tariff-plans as listed above, the number 25 may not be all too bad. However alternative may be to limit this number to 10 / 15, and review the situation after 6-9 months.

**Q-6) Should there any limit be prescribed on the rates for premium rate SMS and calls? If so, what should be the norms for prescribing such limit?**

A-6) Premium rate services are offered with an obligatory fine-print, which is sometimes given a miss, thus confusion around Premium rate does exist. So, there should be some periodic campaigns run to educate subscribers about Premium rate services and range of possible charges. Once this is done, setting a limit become unnecessary. Premium rate is a way of charging people for services rendered. If they do not find the services valuable enough, know how much it may cost them, they make an informed decision to use it or not. So, for sake of choice, limit isn't needed.

**Q-7) If not, what further measures do you suggest to improve transparency in provision of the premium rate services to prevent the instances of subscribers availing such services without understanding financial implications thereof?**

A-7) At the start of every premium rate-service, or in case of SMS, immediately after it's usage, a notification must be sent by operator to subscriber, warning them about this being a premium service and the rate applicable. In case of voice based service, subscriber may drop out if not interested, and in case of SMS, the delivery can be held until user sends a confirmation.

Since the implementation of such policies may be an additional cost, the implementation may be such that premium service below a certain price-point are allowed to go thru as-is, and other are subjected to the cross verification.

**Q-8) Do you think there is sufficient justification to allow the service providers to realign the ISD tariff in respect of existing lifetime subscribers in view of the grounds mentioned in their representations?**

A-8) Yes

**Q-9) What measures do you think are necessary to improve transparency and to prevent instances of un-intended recharges by subscribers in situations of cross-restrictions of recharges?**

A-9) Clearer communication, cross verification, means for subscriber to check information using basic-phone, proactively.

**Q-10) Considering the nature and structure of the prevailing tariff offerings in the market and advertisements thereof, do you think there is a need for TRAI to issue fresh regulatory guidelines to prevent misleading tariff advertisements?**

A-10) Yes

**Q-11) Do you agree that the instances of 'misleading' tariff advertisements listed in this paper adequately capture the actual scenario in the market? If not, provide specific details.**

A-11) Yes

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