

## **NCAER Comments by Dr Bornali Bhandari, Senior Fellow**

**on**

### **“Consultation Paper on Transparency in Publishing of Tariff Offers, 27 November 2019”**

The Telecom Regulatory Authority of India (TRAI) has issued a Consultation Paper titled "Transparency in Publishing of Tariff Offers" on 27 November 2019". The key comments on the paper are:

1. Question 1: Whether TRAI should prescribe any format for publishing tariff? Please support your answer with rationale.  
*The TRAI should prescribe a format for publishing tariff which displays not only the price of voice calls but SMS, data, international calls & SMS etc. Lack of clear depiction of variety of tariff especially bundling charges creates confusion to the consumer.*
2. Q.2: *It should provide the same format in multiple channels.*
3. 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.  
*The calculator tool is helpful in computing total enrolment and subscription fees.*
4. 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.  
*The service providers should clearly state the charges after discontinuation of the tariff plan.*
5. 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.  
*Yes, they should so that the subscriber can choose what is best for them.*
6. 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.  
*The website is the most important source of information for a subscriber. As mentioned in Questions 1 and 2, all active tariff plans should be displayed in the same consistent manner on the website, with the additional feature of the calculator. The manner of display is already suggested in Questions 1 and 2.*
7. Q.7: Not needed.