Inputs for Draft Telecommunication Tariff (Sixty Sixth Amendment) Order, 2021

Subject: Comments on 'Regulatory framework for USSD-based tariff''

NPCI suggests the following points pertaining to USSD

Charge for outgoing USSD session for USSD-based mobile banking and payment services

a. With a view for rationalizing the charges a user pays per SMS or for a 1 min call, making the charges NIL for USSD services will act as a thrust in providing aid to the users of the service. Keeping in the target group that users the service and to aid Digital Financial Inclusion this change would have a positive effect amongst the users. Also during demonetization when USSD charges were made NIL, considerable growth was observed for UPI payments.

Growth of the USSD service user base -

a. There are a total of 4 Telcos live on the service (Airtel, Vodafone, BSNL & MTNL), coupled with the above change if the other Telcos would also go live on the service it would only help to reach out to a larger base of users and allow them the opportunity to make use of the service via their feature phones.

NPCI has the following inputs pertaining to UPI payments on feature phone and voice based payments

- For UPI payments on Voice Call to get mass adoption, we feel the following help from TRAI can be sought which can go a long way in helping business adopt it and give the customers a trust to pay in a call.

1. A Pan India short code for Merchant payment e.g. 1929 where a customer can call and enter the merchant code to make a payment to the merchant.
2. Availability of 4/5 digit short code for government, utilities, etc to launch services and collect payment. e.g. We should be able to get a number like 1925 for Bharat Gas, or Electricity Board etc
3. A special series (like 140) for outbound campaigns of payment services. This is important for customer trust so that the money can be collected in an outbound call

4. A special series phone number to distinguish the legitimacy of IVR to collect payment for Inbound.

5. The capability of "Call transfer" (handover) the call from any normal IVR, telephony application (on a telephone number) to a payment number (the special payment series number). This is required for scale and interoperability with all existing IVRs, call center applications to make them payment enabled with comprehensive security.

6. Lower Call Cost per Minute over PRI / SIP Trunks: Currently Cost per Minute is Rs. 0.50/- (50 Paise per Minute), lower cost for high volume commitment is 0.10 Paise per minute.

7. Lower Rental Cost of Direct Inward Dialing (DID)'s for giving to Merchants (Voice based payments): Currently Standard Monthly Rental is Rs. 50 per landline number DID, lowest on volume commitment is Rs. 30 per month. This is a major cost, Example for PM SVanadhi 10 Lakh Merchants, cost will be 10L x 30 = 3 Crore INR per month. Merchants may not want to pay rental per month as they don't pay any rental for QR Code Stickers

8. Higher Ratio permission for SIP Channels to DID, currently (10:1) 10 DID's are max permitted for every channel / concurrent session for IVR TXN: Since this is voice based payments, and not Call-center type usage, TRAI should allow telcos to allow 300:1 vis-a-vis 10:1

9. Premium Toll-Free Numbers / Short-Dial numbers / Premium Landline numbers for P2P Transactions for ensuring quick & high adoption.

10. Dual Line Redundancy / Allowing DR or Disaster Recovery on Telecom SIP Lines for fintechs

11. Lower Cost of Transactional SMS

12. For UPI payments where SMS is used for information exchange from handset in Feature Phone: Around 5 SMSs are used when user is on-boarded which includes activity like device binding, Link A/C no, Set UPI PIN, etc. For every payment flow, minimum 1 SMS is required. Since UPI solution works with SMS sent to a longcode, it is treated as a P2P SMS. IF charges for these SMSs can be made NIL.

13. TRAI should allow Telcos to share CellSite ID with NPCI for better fraud management

14. Geotagging of transactions

15. Central call back number for NPCI for voice based payment

16. Telco to block all unregistered call by IVR