

RJIL/TRAI/2018-19/596
10th December 2018

To,

**Shri Kaushal Kishore,
Advisor (F&EA-II),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg,
New Delhi - 110002**

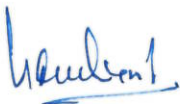
Subject: Comments on Consultation Paper on 'Review of extant provision for sending the printed bills to consumers of landline and Post paid Mobile subscribers' dated 15th November 2018.

Dear Sir,

Please find attached comments of Reliance Jio Infocomm Limited on the Consultation Paper on 'Review of extant provision for sending the printed bills to consumers of landline and Postpaid Mobile subscribers' dated 15th November 2018.

Thanking You,

Yours sincerely,
For **Reliance Jio Infocomm Limited**,



Kapoor Singh Guliani
Authorised Signatory



Enclosure: As above.

**RELIANCE JIO INFOCOMM LTD'S COMMENTS ON TRAI'S
"CONSULTATION PAPER ON REVIEW OF EXTANT PROVISION FOR SENDING THE PRINTED BILLS
TO CONSUMERS OF LANDLINE AND POST PAID MOBILE SUBSCRIBERS DATED 15th NOVEMBER
2018"**

General Comments:

1. Reliance Jio Infocomm Limited (RJIL) thanks the Authority for issuing this consultation paper to review the default option for providing the bill the consumers of landline and postpaid mobile subscribers. The Authority has rightly taken cognizance of the changed circumstances and has sought to evaluate discontinuing the requirements of issuing printed bill to postpaid subscribers of landline and mobile services, by default.
2. We submit that use of paper is neither consumer friendly nor environmental friendly. Besides the obvious destruction of trees to make paper, also noted by the Authority, paper production involves a lot of water, it is estimated that conventional paper plants use close 35-45 Gallons of water to produce 1 pound of paper¹. Even the most efficient of such plants use a substantial amount of water. So much so that it is claimed that 5 litres of water is required to make 1 A4 size paper.
3. Additionally, paper has many other adverse implications like air pollution by paper mills, castoff paper being a major component of urban solid waste with contribution to landfills. The compound effect is such that Paper pollution is widely regarded as a major environmental threat. Thus clearly, it is a responsibility of each industry and service to keep the consumption of paper at bare minimal.
4. We submit that the telecom industry is at an advantage to reduce the paper consumption, as it already has inbuilt solutions for the same. Printed Customer Application form and monthly bills were two major sources for paper consumption in Telecom. The Government has already implemented an alternate digital process to eliminate the use of paper in customer verification, now the onus is on the Authority to minimize the usage of paper in customer bills by mandating the use of e-bill and m-bill.
5. As also mentioned in the Consultation Paper, the default paper bill provision was implemented in 2008, however, at that time the primary discussion was on whether to permit charging for paper bill. The free paper bill was preferred to convey the charging details and the important information to the consumers as most consumers did not have the facility to use e-bill.

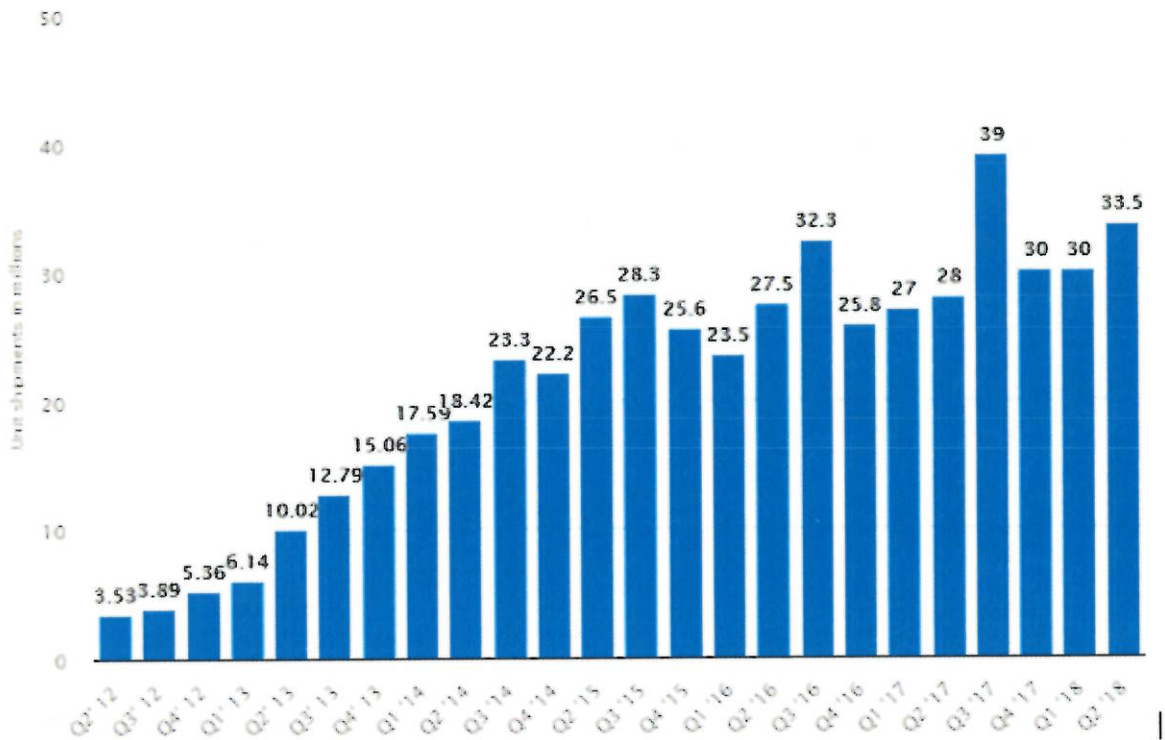
¹ <https://paperonweb.com/A1015.htm>



6. However, as the Authority is aware, there have been momentous changes in the sector since 2008. The subscriber base has increased from 233.63 million in January 2008 to 1191.40 million in September 2018. The broadband subscriber base has moved from 3.13 million i.e. a mere 1.33%, of subscriber base in January 2008 to 481.70 million i.e. more than 40% of the subscriber base, while the number of internet users has reached 512.26 million.

7. Similarly, the internet capable devices are ubiquitous now. With the advent and proliferation of wireless broadband post introduction of 3G and 4G services in the country, majority of subscribers are increasingly using smartphones. The smartphone shipments in the country are steadily increasing over the years with over 30 million units being shipped regularly in a quarter. Below graphics² are clearly indicative of the preference for smartphones.

Total number of smartphone unit shipments in India from second quarter of 2012 to second quarter of 2018 (in million units)*



² <https://www.statista.com/statistics/298097/smartphone-shipments-india/>



8. Similar changes are also seen in the feature phone market. As per Counterpoint's³ Market Monitor service, India's feature phone segment doubled in Q1 2018, however this was caused by strong shipments of Reliance JioPhone, which is more of a feature smartphone than a typical feature phone. Even the other feature phones being shipped are internet enabled. Evidently, most of new devices are internet enabled and supportive of e-bill and m-bill.
9. The Authority is clearly in a position to mandate the e-bills and m-bills as default option. These options are easy to use and convenient for the subscribers, at the same time are environment friendly. Further all important and critical information required by subscribers can be made part of the e-bill and m-bill. While detailed e-bill is generally provided in pdf formats similar to the paper bill, in m-bill a tiny URL can be added, which will provide the detailed bill in an html format. Further, to facilitate the subscribers, data usage for availing these facilities can be white-listed.
10. The only segment of subscribers that cannot avail e-bill/m-bill are the feature phone post-paid users without data connectivity. We submit that the number of such subscribers is publically not available, however, we understand that this number cannot be more than a handful. Certainly there are no such customers in RJIL's network. Further, with handset lifecycle and advent of technology would imply that these number will dwindle further and further.
11. As per the Ericsson Mobility Report November 2018⁴, more that 80 percent of Indians users will be on 4G-LTE by the year 2024 with 5G also being made available by that time. Thus clearly these customers will move on to internet enabled service and devices soon and whatever protection is required for non-data users cannot be for much longer period.
12. Evidently, persisting with the mandatory provision of paper bill for all postpaid subscriber would be unreasonable as the protection for a tiny fraction of subscriber should not outweigh the multiple advantages of the default e-bill/m-bill for the industry, customers and environment. Therefore we submit that the Authority can mandate paper bill for the post-paid subscribers with non-data enabled feature phone.
13. We submit that the concerns regarding e-literacy do not have much relevance in present times of increasing broadband penetration and Digital India. The ever-expanding penetration levels of over the top applications is a testament to increasing e-literacy. The

³ <https://www.counterpointresearch.com/india-feature-phone-market-doubled-smartphone-market-remained-flat-yoy-q1-2018/>

⁴ <https://www.ericsson.com/en/mobility-report/reports/november-2018>



literate telecom subscribers are very quickly becoming e-literate, a change that is supplemented by the availability of various applications and e-government programmes in regional languages.

14. The Authority may also note that the convenience of usage of basic facilities has increased the adoption of self-care applications, so much so that a large number of prepaid recharges and bill payments are now being carried out only on self-care applications. The service providers keep innovating to bring people on digital platforms, for instance RJIL is in the process of making available real-time postpaid bill to its subscribers on the self-care app. Under this the subscribers will be able to see their bill at any time of their choice and also make instant payments at the same interface.
15. We submit that major utilities are already providing the bills and invoices in digital formats. In fact many major merchants have also started providing the billing details in e-bill and m-bill formats. The Authority may also take cognizance that various other public utility services like Railways, Airports and Cinema halls, have successfully moved to digital formats, changes that has been welcomed by the users. , We submit that the Authority has always taken lead in proliferating changes and this change has to be initiated in the most digital of all sectors in the economy i.e. telecom.
16. We submit that the Authority should not only go ahead with mandating e-bill and m-bill as default option for billing for postpaid wireline and wireless subscribers but it should also introduce a financial deterrent against printed bill. The subscribers with non-data enabled feature phones and persons with disabilities should be exempted from this physical deterrent.

Conclusion:

1. **TRAI should discontinue the default option of provision of printed bill to postpaid landline and mobile subscribers and instead mandate e-bill and m-bill as default options.**
2. **The subscribers with non-data enabled feature phones and persons with disabilities may be provided printed bill free of cost, if they opt for the same.**
3. **The Authority should introduce a financial deterrent for all other subscribers opting for printed bill.**
4. **The Authority should further promote the self-care apps**

Issues for Consultation



- (i) As per the extant provision of TTO (46th Amendment), provision of hard copy of the bill or printed copy of the bill to postpaid subscribers is mandated as a default option. Is there a need to change the extant default option, i.e., provision of paper bill without any charge to postpaid subscribers of Wire line and (ii) Mobile services? Kindly support your answer with rationale.

And

- (ii) As against the existing practice of issue of printed bill to postpaid subscribers of (i) Wireline and (ii) Mobile service, unless a subscriber opts for electronic-bill (ebill), should e-bill now be made the default option? And if so, why?

RJIL Response:

1. RJIL submits that the extant provision of hard copy of bill to postpaid subscribers of Wireline and Mobile services as the default option should be revoked and instead e-bill and m-bill should be made the default billing option. These options are not only environment friendly but are also consumer friendly.
2. As also noted by the Authority in 46th amendment to TTO, the bill generally facilitates the subscribers in (a) understand and satisfy oneself about the genuineness of the bill; (b) facilitate making of payment; (c) verify the charges incurred by the consumer; (d) monitor usage or expenditure by consumer, in addition to providing certain important information to the subscribers.
3. We submit that all these purposes do not require a multi-page paper bill and a short e-bill/m-bill with a link for details will suffice. Anyhow, in the current era of unlimited calls and data against fixed monthly charge, most of these details are superfluous. Further, the all-important information prescribed by TRAI can be provided to the consumers in the details available in the link. As also mentioned data usage for this link can be whitelisted, in the interest of customers.
4. We have already highlighted the environmental factors related with provision of paper bills. We would also like to highlight the associated data security issues. Replacing paper bill with e-bill/m-bill would reduce the flow of personal information from unsecured letter box, where the bill can be lost, stolen or accessed by someone else other than the owner. Additionally, sending the bills online would ensure its prompt delivery, even in case of physical unavailability of the customer at his address (or unreported change in address), which incidentally is a reason for many billing disputes and late fee related disputes. Further, e-bill will be available to the subscribers practically as soon as it is generated thus increasing the time available to settle the dues.



5. We further submit that e-bill/m-bill will also enhance the Government's efforts to digitization and cashless transactions. Digital modes of payment like UPI can be easily integrated with e-bill/m-bill by allowing dynamic QR code based pay options, which is not possible in printed bill.
6. As also mentioned in the general comments, the rapid proliferation of new data based technologies and smartphones has made the default usage of e-bill and m-bill a real possibility. It is pertinent to highlight here that the proliferation of smart phone and internet usage has also reached rural India. As of December 2017, wherein, Urban India saw Internet usage growth of 18.64% YoY, Rural India also witnessed an estimated growth of 15.03% during the same period. (IAMA report 2018).
7. We further submit that the individual postpaid subscribers are generally high ARPU customers having usage/access to smartphone and email facilities and thus this change would be least disruptive to such consumers.
8. As also mentioned by the Authority there is an inertia in consumers to opt for the e-bill/m-bill on their own, in fact, the perception is that it will benefit the telecom service providers is abating this inertia leading to a complete disregard for environmental concerns and their own ease. Evidently the onus is on the Authority to lead this movement towards greener telecom by mandating e-bill and m-bill.
9. We are sure that the subscribers will easily embrace this change as they have been quick to adopt most digital innovations. Nevertheless, for customer convenience and awareness, the Authority can mandate a periodic message to subscribers for opting for hard copy of the bill.
10. We submit that the Authority may also consider a financial disincentive to the customer's opting for hard copy. The subscribers with non-data supporting feature phones and persons with disabilities should be kept out of this deterrent charge.

(iii) If e-bill is made default option then how the bills would be made available to Postpaid subscribers of (i) Wireline and (ii) Mobile services with (a). Subscribers of Feature phones and (b). Subscribers who do not have e-mail facility.

RJIL Response:

1. RJIL submits that most of the landline subscribers are also wireline internet users and the service providers maintain an alternate number and e-mail id for these subscribers. Thus e-bill/m-bill can be provided to these subscribers.



2. In case these subscribers do not have alternate mobile numbers or e-mail facility then these landline subscribers can be treated at par with the non-data enabled feature phone users and a printed bill can be provided to these subscribers. Further, these subscribers can be incentivized to create an e-mail account (which is generally free of cost), by allocating freebies in the form of additional voice/data, billing discounts etc.
3. The mobile subscribers with feature phone will be provided the m-bill in SMS. This bill will include basic charging details and a tiny URL, which will lead to the detailed bill. As mentioned in the general comments, the subscribers with non-data feature phones are not expected to be high and these should continue receiving the bill in hard copy format.

- (iv) **If a subscriber opts for e-bill and requests for change the option to printed bills, will there be a charge for providing the printed bill? Kindly provide reasons for your answer. and**
- (v) **What could be the safeguards for subscribers who do not wish electronic bills and prefer to get printed bills?**

RJIL Response:

1. RJIL submits that e-bill/m-bill should be a default option for telecom subscribers and not an option. Instead the subscribers should be provided an option to receive the hard copy bill only on payment of a financial deterrent.
2. The safeguards for the subscribers opting for hard copy bill will remain unchanged. The subscriber's billing option cannot be changed without explicit consent. .

- (vi) **TRAI has mandated specified set of information to be printed on bills to postpaid subscribers. If the printed bill is not issued, then how the specified set of information will be conveyed to subscribers? Should the same be mandated for e-bills also? Kindly support your comments with justification.**

RJIL Response:

1. RJIL submits that the Authority specified information will be necessarily provided to the postpaid telecom subscribers by incorporating the same into the detailed digital format to be provided as part of e-bill/m-bill.
2. The e-bill format will be same as the current paper bill format with all the specified information.



Reliance Jio Infocomm Ltd

3. The m-bill format will be a short billing format, as the same would be delivered as SMS and self-care notification, however, it will always contain a tiny URL, which will open into a detailed bill, in HTML format, containing all information as specified by TRAI.

(vii) Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

RJIL Response:

1. We submit that in interest of consistency and consumer convenience the format for m-bill on SMS within 160 characters may be prescribed by the Authority.

