

Dear Sir,

I appreciate TRAI to start the consultation process on the issue of paper bills. TRAI has the consultation process which is very exhaustive but often you may find very less participation from consumers' side. That is the moot point. Most of consumers are not having access and those who have are also not used to or don't access the news on internet. Therefore the question arise are we prepared for it ? And my answer on behalf of consumers is we are not. When i say we are not i mean we can not go with the telecom companies' idea of e-bill as default option. Digital-first communications should be becoming the norm once we reach at desired level of literacy, proliferation of resources, but offering only e-billing at this stage could have negative effects on vulnerable and low-income consumers.

Similar arguments were made by Public Interest Advocacy Centre (PIAC) and National Pensioners Federation (NFP). PIAC and NFP stated concern about how the lack of paper billing would affect groups including people with disabilities, senior citizens, low-income consumers and "those who do not have the resources to take advantage of e-billing."The two public advocacy groups have joined together to file an application with the Canadian Radio-television and Telecommunications Commission (CRTC) requesting the Commission clarify that wireless providers must offer paper billing upon request. The request comes following complaints received by both organizations from Koodo customers who note that the Telus-owned brand has discontinued paper billing. PIAC and NFP argued that paper billing should be an option by virtue of the agreement on paper billing negotiated on August 28th, 2014; Alternatively, the organizations are requesting that the Commission impose a condition requiring all telecom service providers to provide paper billing upon request. PIAC cited the 2017 CRTC Communications Monitoring Report in stating that only 64.4 percent of households in the bottom income quintile and 82.1 percent of households in the second income quintile use home internet and slightly fewer have home computers. In August 2014, the CRTC settled on an agreement with Canadian telecoms that certain groups of customers not be charged a paper billing fee that generally amounted to an additional \$2 to \$6 per month. In October of that year, the government eliminated fees for telecom paper bills in the 2014 Federal Budget.

I am attaching the copies of these reports which demonstrate that when developed countries like Canada are not prepared for the condition where e-bill is a default option. Strategically moving most customers away from the paper bill and onto electronic bill presentment (e-bill) delivery has often been an elusive goal for billing organizations. It is also a fact that more and more, consumers are receptive to the e-bill in place of the paper version, but enticing them to make the switch has often proven to be easier said than done. India is still have to a long way. All the arguments given by the TSPs are not suited us at this point in time. We should continue with current arrangement and review the situation at least five years from now. It may be recalled that one the main objective of the Telecom Regulatory Authority of India Act, 1997 is to protect the interest of the service providers as well as the consumers. The telecom service providers have already been given the advantage as they bills in hard copies for prepaid consumers is not a default option. Which may be reviewed and the prepaid consumers be provided with the option of hard printed copies with nominal charges. It is also suggested that TRAI should ask TSPs to develop a suitable environment for the discontinuance of paper bill....some of them may interalia include keeping more data on line for easier retrieval, improving their billing and reduce the mistakes, developing mechanism of e bills for non smart phones to cite a few.

TRAI may also hold the open house discussions at small towns beside holding at metros to get a true picture and also may like to conduct a survey through organisations like NIPFP.

Regards

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