

**Question 1: Do you think that the measures prescribed currently are adequate to ensure transparency in the tariff offers made by TSPs? If not, then, what additional measures should be prescribed by the TRAI in this regard? Kindly support your response with justification.**

**Answer 1-** Present measures are adequate to ensure transparency in the tariff offers made by TSPs. However, there is a need to ensure that TSPs are functioning according to those measures.

**Question 2: Whether current definition relating to “nondiscrimination” is adequate? If no, then please suggest additional measures/features to ensure “non-discrimination”.**

**Answer 2-** Yes, the definition of “non discrimination” is adequate.

**Question 3: Which tariff offers should qualify as promotional offers? What should be the features of a promotional offer? Is there a need to restrict the number of promotional offers that can be launched by a TSP, in a calendar year one after another and/or concurrently?**

**Answer 3-** Any extra benefits provided by TSPs to the consumers other than the regular plans, can be considered as ‘Promotional Offers’ and yes, there is a need to restrict the number of promotional offers in order to ensure fair competition in the market.

**Question 4: What should be the different relevant markets – relevant product market & relevant geographic market – in telecom services? Please support your answer with justification.**

**Answer 4-** Relevant geographic market should be the relevant market in telecom services, which means a market comprising the area in which the conditions of competition for supply of goods or provision of services or demand of goods or services are distinctly homogenous and can be distinguished from the conditions prevailing in the neighboring areas.

**Question 5: How to define dominance in these relevant markets? Please suggest the criteria for determination of dominance.**

**Answer 5-** Dominance can be defined by the position of strength of an enterprise in the relevant market through which it can affect its competitors and consumers.

**Question 6: How to assess Significant Market Power (SMP) in each relevant market? What are the relevant factors which should be taken into consideration? 30**

**Answer 6-** SMP can be assessed by considering the market share of TSPs and the licensed service area.

**Question 7: What methods/processes should be applied by the Regulator to assess predatory pricing by a service provider in the relevant market? Question 8: Any other issue relevant to the subject discussed in the Consultation Paper may be highlighted.**

**Answer 7-** Following points can be considered for assessing predatory pricing-

- Assessment of dominant position in the relevant market;
- Evaluation of whether the dominant enterprise is resorting to pricing below Average Variable Cost (AVC) with the intention of driving out competitors from the market.

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