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RJIL/TRAI/2019-20/674
28th February 2020

To,

Shri Amit Sharma
Advisor (F&EA)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg, New Delhi 110002

Subject: Comments on Consultation Paper dated 17.12.2019 on 'Tariff Issues of Telecom Services'.

Dear Sir,

Please find enclosed comments of Reliance Jio Infocomm Ltd. on the issues raised in the Consultation Paper dated 17th December 2019 'Tariff Issues of Telecom Services'.

Thanking You,
For Reliance Jio Infocomm Limited,

Kapoor Singh Guliani
Authorised Signatory



Enclosure: As above.

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**RELIANCE JIO INFOCOMM LTD'S COMMENTS ON TRAI'S CONSULTATION PAPER ON
"TARIFF ISSUES OF TELECOM SERVICES"
(Consultation Paper Dated 17th December 2019)**

1. Reliance Jio Infocomm Limited (RJIL) thanks the Authority for issuing this consultation Paper to take stakeholders views on the need for intervention in telecom tariffs to revitalize the investments in the sector. The fixation of floor price for data services is vital for maintaining the health of telecom sector and continuation of delivering the best value to Indian consumers.
2. The Indian telecom Industry has already represented to the Authority that meeting the ambitious targets enunciated through various programs, policy papers and National Digital Communications Policy, 2018 (NDCP-2018) missions of Connect India and Propel India and so on require unprecedented scales of investments in telecom technology and infrastructure. However, the decades of massive investments coupled with rock-bottom tariffs has left the industry devoid of funds to make further investments in the sector.
3. RJIL has always been at the forefront of technological innovation and bringing new technology to the country and we wish to fulfill the Government's target of being 5G leaders in the world. We also believe that various enabling schemes like 'Digital India', 'Smart Cities', 'Har Ghar Broadband', Digital Connectivity and so on, will propel the country to the forefront of world economic development.
4. We believe that other TSPs must also be equally eager in this nation building exercise but as we understand they are unable to do so effectively owing to lack of financial resources, given the current sector situation after major consolidation in last couple of years. This is corroborated by the fact that the Authority has also analyzed and concluded that the Industry margins are shrinking thereby constraining ability of Telecom Service Providers (TSPs) to make new investments for continued technology upgradations.
5. Lower revenue realizations has resulted in much lower returns on the capex made in the sector, which is already characterized by its long gestation period; this has negatively impacted the sector investment in network infrastructure. Given the sector situation at present, there is a need to address the issue of falling revenue, which is critical to boost sector financial strength and ensure that the TSPs can continue with planned capex investment, required to provide quality service to consumer and help India advance on its digital mission. Based on present consumer consumption pattern, it is well established that the data services have become the primary services. We recommend that a minimum realized tariff should be



prescribed for the wireless data services (hereinafter also referred as data floor price) to ensure a stable tariff environment for the sector players.

6. As mentioned by COAI in its earlier representation, we reiterate that while steps like tax rationalization are also needed for sector relief, it will still not effectively help the TSPs generate sufficient revenue, which can only be addressed by an increase in tariff. For sake of clarification, when we refer to any floor tariff or tariff correction/increase, we are referring to realized tariff for data services only.
7. We submit that currently the service providers are primarily charging for only two services i.e. data and voice. Of these, voice services are utilized by all telecom subscribers in the country including those at bottom of the pyramid with old devices that may not even be capable of handling data services. Further, the Authority has noted that there remains substantially large subscriber base of above 500 million marginal users subscribing only for voice service. Thus, any intervention leading to increase in voice tariffs will be against the general consumer Interest. Therefore, the Authority is requested to continue the policy of forbearance for voice services, which is the preferred telecom service of the subscribers at bottom of pyramid.
8. We submit that heavily streaming smartphone users in India are currently paying the lowest possible data tariffs across the world. Thus, the realized tariff correction for data services will not be out of sync with the global trends as India has the lowest realized data tariffs globally, as per analysis done by UK-based price comparison website cable.co.uk, of 6,313 data plans across 230 countries data tariffs in India are around 50 times lower than the tariffs of major developing/developed economies. Hence the only logical avenue for regulatory intervention, given the evolving state of Indian telecom consumer space, is the Data Services.



The Cost of Mobile Internet Around the World

Average cost of 1GB mobile data in selected countries in 2019 (U.S. dollars)



6,313 mobile data plans in 230 countries were gathered and analyzed by Cable.co.uk
 Source: Cable.co.uk
 @StatistaCharts



9. With respect to voluntary tariff increase by the industry, as must have been observed by the Authority, the rationalization of tariffs carried out recently by all TSPs could not be sustained at announced levels for more than 2-3 days. The moment one TSP announced its revised tariffs, the other TSPs embarked on further reductions and bettering of tariffs, nullifying the increase to a large extent. Further continuation of segmented and one-to-one offers in the market place nullifies the intended effect of tariff increase. Hence, this establishes the fact that a regulatory regime of forbearance and letting market forces determine the tariff, is not a sustainable solution for ensuring higher revenue generations for the TSPs. Given the current competitive environment in the sector, we recommend that the Authority should intervene and fix the floor for realized price for wireless data services.

10. We submit that data floor price fixation exercise should not be shackled by varied costs of data services basis the technology deployed by the service providers. Since the entire focus is on increasing the sector revenue to ensure sustainable growth through continued investments, the floor price fixation exercise should be benchmarked to the industry revenue and further investment targets. We therefore submit that the data floor should be fixed on the basis of realized revenue from data services. As mentioned by the Authority, the realized revenue ranges from Rs. 9 to 12 per GB. The Authority should target to improve the realization at least to Rs. 20 per GB.



11. Considering that a typical Indian consumer is very price sensitive and any knee jerk increase in price can lead to slump in demand for the wireless data services, thus impacting the ongoing digitization drive in the county; the target floor price should be implemented in 2-3 tranches so as to minimize the impact of increase in tariff. We further submit that once the data floor price is implemented, it should be uniformly implemented across all tariffs and should be applicable to all segments of subscribers be it individual, corporate or any other kind. Resolution should be to ensure that no data tariff should be available below the prescribed data floor price.
12. The data floor price should also cover the bundled tariffs and all service providers should be required to comply with the requirement. The service providers, desirous of offering bundled tariffs, would be required to clearly define all the elements of a bundled plan and ascribe value to the same. Except for on-net voice, this ascribed value should not be zero and should be at least equivalent to the comparable standalone packs for the said service.
13. We submit that this will help stabilize the TSP revenues and improve the sector financials leading to more investments in the sector. The only objection to such an intervention can be the view that increase in tariffs is not consumer friendly. However, the Authority should be mindful of the fact that the consumer interest will be served by better competitions, availability of latest services and robust and efficient networks offering better service quality, which all requires enhanced investments and the only way to do the same is through increase in revenue for TSPs by correction in data tariffs.
14. **Conclusion:** To sum up above submission, the Authority should intervene and prescribe floor price for wireless data services and following points need to be considered in the TRAI order for smooth and effective transition from Forbearance to Data Floor in Telecom tariff.
 - a. **Voice under forbearance:** Voice tariff should continue to be under forbearance as before as the same will affect the masses and will be difficult to implement. However, as long as IUC continues all operators should be required to charge at least IUC charges for all off-net voice calls.
 - b. **Floor for All Categories:** Floor to be prescribed for data service for all categories (Corporate, Consumer, Segmented, Tendered or otherwise contracts and any other) of customers.



- c. **Gradual Increase in Floor Tariffs:** India is very price sensitive market. If data tariff is increased abruptly, it will dampen the usage considerably and revenue increase may not be of desired level. Therefore, it needs to be increased gradually from current level being realized from the customer to Rs 15 per GB as of now and to Rs 20 per GB after six to nine months based on the growth in data consumption.
- d. **Effective date for Withdrawal of Existing Plans:** Authority should fix an effective date by amendment to existing TTO, from which all existing plans (Corporate, Consumer, Segmented, Tendered or otherwise contracts and any other) for mobile Telephone Services of all operators shall stand withdrawn.
- e. **Validity of Current Plans:** All plans should close at the end of validity of existing fully paid plan for pre-paid and post-paid and corporate plans should close at the end of the monthly billing cycle.
- f. **Prior Approval of Tariffs:** To ensure compliance to the tariffs, all new plans of all operators need to be approved by TRAI before the effective date of implementation.
- g. **End of Tariff protection:** Currently, operators have to comply with 6 months protection requirement for tariff change. This mandatory tariff protection requirement to be dispensed with for all existing plans.
- h. **Amount to be attributed towards wireless Data Floor calculations:** While calculating data floor, TRAI should clearly specify how value towards bundled services like voice, SMS, VAS, Apps, content etc. will be calculated, to have transparent and uniform implementation across operators.
- i. **No Bundled Plans with unlimited free off-net voice minutes:** No operator can issue bundled plans with unlimited free off-net calls along-with data, as long as the IUC charges continue.
- j. **No Segmented / "One-to-One" offers:** To have effective implementation of floor tariffs, appropriate regulatory framework is required to be put in place to ensure that no operator provides any segmented / "One-to-One" offer to circumvent the prescribed floor tariffs.



- k. **Number of Plans:** TRAI mandated limit of plans should include all plans including corporate, consumers, pre-paid, post-paid, segmented, tendered or otherwise contracts and any other plan.
- l. **Guidelines for Discounts/Promotions:** TRAI need to prescribe clear guidelines for offering discounts or promotions for any specific plans or circumstances.
- m. **Floor should be determined on Headline Tariffs:** To avoid any ambiguity, the data floor to be determined on Headline Tariffs (and not on realized tariffs). Further, in case of tariffs with daily data entitlement, TRAI may consider if any discount factor to be provided to take into account breakage / forfeiture of bundled data
- n. **Post Fair Usage Policy (FUP) data not to be considered:** The floor to be applicable only for high-speed data offered in a plan and the low speed data offered post FUP not to be considered for the purpose of calculation of per GB realized tariff. If necessary, maximum FUP speed can be specified by TRAI.
- o. **Specifying minimum level of voice only plans:** While, there should be no floor for voice calls, a minimum level of voice only plans needs to be specified to have parity across operators.
- p. **Post-paid and Prepaid:** MRP to be considered for floor consideration. Further, the rate of bundled GB and usage above plan entitlement should be the same.
- q. **Breakage/Carry Forward Data:** At present carry forward of the data is made available to post- paid subscribers and may be required for prepaid subscribers as well in view of increased tariffs. This carry forward data should be excluded while calculating the per GB value of the plan.
- r. **Provision for review:** TRAI may incorporate review provision for the TTO after 3 years to provide clear visibility and predictability.



Issue wise response:

Q1. Do you foresee any requirement of regulatory intervention at this stage in tariff fixation to protect the interest of telecom service providers as well as the consumers? Please support your comments with justification.

And

Q3. If the answer to Q1 is in affirmative, is fixing a floor price, i.e. a standing prohibition on TSPs not to offer services below a predetermined price level, the answer? Please give detailed reasons for your response.

RJIL Response:

1. Yes, as explained in General comments, we understand that the telecom sector, on the whole, is at a critical inflexion point and there is an urgent need for regulatory intervention to protect the interests of the consumers and service providers.
2. The Authority is aware that telecom is a recognized tool for socio-economic development and is deemed a key infrastructure for economic growth because of its multiplier effect benefits to other industries. The Indian Government has recognized this potential and has designed large number of public welfare programs based on the digital backbone. However, the years of massive investments, hyper competition, cut throat prices, deteriorating debt situation for a few players, have left the industry with inadequate investment potential to realize these national ambitions.
3. Given the sector situation at present, there is a need to address the issue of falling revenue, which is critical to boost sector financial strength and ensure that the TSPs can continue with planned capex investment, technology upgradation required to provide quality service to consumer and help India advance on its digital mission. As envisaged in the NDCP-2018 and further reiterated by the Government in its 'National Broadband Mission', the quantum and timelines of investment brought into the sector is a very good indicator of the health and long-term prospect of the sector, whereas an investment of around USD100 billion is envisaged over the next 3 to 4 years in the telecom sector in order to achieve the objectives of the policy.
4. Therefore, as explained in the General Comments, the only feasible solution seems to be a regulator-imposed floor tariff for the wireless data services. The step-wise implementation of this data floor will ensure a steadily increasing revenue for all the service providers in the sector and will create enough surplus to ensure adequate investment for building future



proof digital backbone infrastructure. At the same time, we do not support floor price for voice services as the same will be against the public interest of affordable tariffs for common man.

5. We submit that this measure will also be beneficial to the consumers. The consumers are ultimate beneficiaries of all technological innovations and would require the long-term availability of internationally comparable digital services rather than face a temporary pain of slight increase in their mobile expenses, which are anyways at the lowest ever level, not only in India but also across the world. We submit that Indian Telecom sector is unique in the sense that we have one 4G only operator, 2G/3G only operators and hybrid 2G-3G-4G operators all desirous of offering latest services to all Indians. However, all these services providers cannot serve the consumers without sufficient investments.
6. Another possible positive outcome from the proposed tariff intervention can be in the form of entirely new investments through a new entrant. The possibility of assured returns can increase the interest of global investors in both new entrants as well as existing service providers.

Q2. Do you foresee any need for change in TRAI policy of forbearance in tariffs? Please give reasons for your response.

RJIL Response:

1. We submit that the policy of forbearance in tariffs has borne fruit over the years by reduction in tariffs, however, every successful policy should be flexible and should respond to current circumstances.
2. As mentioned above, the policy of forbearance should be continued for voice services, however, the continuation of forbearance all across will continue to increase pressure on tariffs due to inherent competitive factors, thereby drying up the essential resources for upgradation and augmentations of networks. This will slowly and steadily impact the quality of service and data speeds leading to deterioration of user experience and harming the larger consumer interest.
3. Therefore, we submit that the need of the hour is for the Authority to revise the policy of forbearance in telecom tariffs and intervene to protect the interests of both consumers and TSPs. As in the current paradigm, data is the leading service, having fastest growing share in



all telecom traffic, it is imperative that the intervention be brought in in the manner of fixing a minimum realized tariff for data services.

Q4. Do you perceive a need to fix floor price despite the fact that the TSPs have increased their tariff recently? Please support your response with detailed justification.

RJIL Response:

1. The recent hike in tariffs by TSPs cannot be seen to be sufficient to address the fund requirement of the sector. Such tariff hikes can increase telecom revenues to some extent only and thereafter the competitive forces again take over and start reducing the tariffs.
2. As was seen with this hike as well, immediately after the hike there was a downward revision by some service providers by re-introduction of free off-net voice calls leading to another cycle of action and reaction thereby belying the exercise to large extent. Further continuation of segmented and one-to-one offers in the market place nullifies the intended effect of tariff increase.
3. For a tariff correction to be successful, it has to come through a regulatory mandate as the floor price fixed by the Authority will be oblivious to such competitive pressures.

Q5(a). What methodology should be used to fix floor price by the Authority and why? Please give detailed methodology with calculations and supporting justification.

Q5(b). If a floor price is considered, what should be the mark up over the relevant costs for arriving at a floor price? Please give detailed calculations and justification for your response.

RJIL Response:

1. We submit that the primary focus of the floor price fixation exercise should be to provide sufficient availability of funds for the sector to meet investment requirements in coming years, thus obviously the floor price should not be linked with costing of TSPs.
2. The correct parameter for fixing the data floor will be the actual realization from data services. As per the data, the current realization is in the range of Rs.9-12/ GB-. In case we were to consider generation of sufficient revenue for the TSPs in near term, then this realization needs to be increased at least to the level of Rs 20 / GB.



3. As submitted in the General Comments, this should be done in 2-3 steps spread over 6-9 months, considering the price sensitivity of the Indian market. This will ensure a gradual impact on the consumers and will help ease the migration to new tariff regime.
4. The analysis of the cost of the services is not a relevant to the context as the revenue will be impacted only by the headline tariffs, thus we request the Authority to ignore such analysis.

Q6: Considering that cost of delivery of telecom services is likely to be different for different TSPs, what parameters should be considered to decide floor price and why? How can it be ensured that such a floor price fixation exercise does not result in windfall profits to few TSPs? Please give your response with detailed reasoning.

RJIL Response:

1. As the Authority has noted that majority of data (over 90%) is offered over 4G networks. Thus, the costing differentials should not have much impact on the profitability and therefore there is no question of any windfall profits to few TSPs.
2. Further, even if it is assumed that there will be some more profit for the most efficient operator, at best it would only be for temporary period. The sufficiently high floor price would in fact incentivize other TSPs to cut their costs by adoption of most efficient technologies bringing cost parity across TSPs, which is also the intended objective of the Authority. All Indian service providers have LTE suited spectrum in sufficient quantities (BSNL/MTNL are also being allocated the same, as per news reports), thus there should be no hindrance in deploying the latest efficient technologies to monetize the cost advantages.
3. Thus, the Authority is requested to approach the floor price fixation from the aspect of improving the investment capabilities of service providers leading to better quality and also from the angle of incentivizing investment.

Q7. Is there a need to fix floor price for mobile data service? If yes, can such floor price be applied uniformly to different categories of subscribers such as retail consumer, corporate, tendered or otherwise contracts, segmented and any other including one on one? If it cannot be applied uniformly, will it not result in discrimination between various categories of subscribers? Please give your answer with detailed reasons and justification.

And

Q8. What should be the basis and methodology for floor tariff fixation for mobile data service? Give detailed justification and calculations for your response.



And

Q9. What should be the representative cost for fixing a floor price for mobile data service? Give detailed calculations and justification for your response.

RJIL Response:

1. As mentioned in our response to previous queries and in the General Comments, the floor price should only be implemented for data service. As highlighted above, Data services are the primary services on offer these days and rest of the services come bundled with this for a majority of subscribers. The telecom subscribers opt for the data plans of their choice, based on the daily data allocation or the overall data availability, applicable FUP limits and so on. Thus, Data services is the most appropriate service to be brought under the floor pricing regime. This will also ensure that the telecom consumers at bottom of the pyramid and using only voice services, will not be adversely affected by this regime.
2. We reiterate that the floor price should be prescribed for wireless data service for all categories (Corporate, Consumer, Segmented, Tendered or otherwise contracts and any other) of customers without any discrimination. We submit that the data floor price should be applied uniformly across all plans and users, and we do not see any reason as to why it cannot be implemented uniformly.
3. We have already suggested the measures which will be required to be implemented alongwith the implementation of data floor rate. The Authority would be required to pre-announce a sunset date for availability of all existing plans with data tariffs lower than the proposed floor. All existing plans will cease to be available post the expiry of validity and end of bill cycle, as applicable. This will pave the way for uniform implementation of data floor tariffs all across.
4. In order to strengthen the compliance with the new regime, we have suggested for prior approval of the Authority for all type of plans, including the segmented and one-to-one tariff offers. All this will ensure, full compliance with the requirements and uniform implementation all across and eliminate the possibility of one-upmanship by service providers.
5. We have already submitted that this floor fixation should not be dependent on cost services but be guided by the intent of increasing the industry revenue as a whole to meet additional investments in the sector. We have already provided the rationale for the floor tariff for data services.



Q10. Should fixation of floor price be considered for voice calls also? Please give your comments with detailed justification.

And

Q11. If the answer to Q10 is affirmative, given that different technologies are being used to provide voice services (2G, 3G and 4G), what should be the methodology used to arrive at a floor price for voice services? Please give detailed calculations and justification for your response.

RJIL Response:

1. We reiterate our submissions that the floor price should not be considered for voice calls, as the same is basic essential service and any changes in the pricing principle for the same would impact the most marginal of telecom subscribers and against policy objectives. Thus, this should be avoided at all cost.
2. In fact, RJIL is the originator of the concept of unlimited domestic voice calls to destinations for all subscribers enrolled on a data plan and all RJIL data plans used to provide unlimited domestic voice and SMS as bundled complimentary service, however, we have been inhibited by the unreasonable continuation of IUC charges. Thus, our intent is to keep the basic voice service always affordable for a telecom subscriber.
3. We would also like to clear one apparent misunderstanding visible in the consultation paper, wherein it has been mentioned that RJIL supports data floor pricing while opposing the continuation of IUC on the grounds of increase in consumer costs. We submit that both the issues are starkly different. In our opinion, IUC is an antiquated levy that just subsidizes and perpetuates old technologies at the cost of consumers and has led to the increase in consumer cost, for even the most marginal consumers, by ending the free voice regime in the country. On the other hand, realized data floor tariff will revitalize the industry and accelerate the process of technology migration by putting a premium on efficiency. While, it may increase the cost, initially for high data consumption consumers but will eventually benefit all consumers and sector as a whole. Thus, there is no contradiction whatsoever in the stand taken RJIL and we reiterate our stand on no floor for voice services and doing away with the IUC levy on the voice calls.
4. We further submit that there is another misunderstanding that by implementing the data floor price, we will be implementing an implicit floor on voice in VOLTE networks and in such networks voice travels as data. On the specific query raised by the Authority in the past, we



have already clarified that the data consumed for transferring voice in IP networks is not debited from the subscriber's data quota and thus these continue to be two distinct products independent of each other. Thus, there will be no case of implicit voice floor for VOLTE networks.

5. Notwithstanding the above, we submit that if at all a floor price is considered for voice services, it should be technology neutral. Any technology-based distinction would be against the declared policy of technology neutrality under the Unified License. Further, any separate consideration for inefficient older technologies would defeat the Authority's goal of technology upgradation and would unnecessarily punish the operators offering voice services on most modern and efficient technologies.

Q12: Should there be any limit on TSPs to offer free offnet calls? Please explain your response with justification.

And

Q13. If your answer to Q12 is affirmative, how should unlimited voice calls be defined? Please give your comments with detailed justification.

RJIL Response:

1. Yes, as long as Interconnection usage charges are applicable for off-net mobile call termination, there should be a restriction on TSPs in offering free off-net calls. At a time, when the Authority and Industry are working for revenue maximization for sector in order to meet the investment requirements, such tariff offering unlimited off-net minutes should not be permitted.
2. As the Authority is aware, RJIL is the original proponent of charging the customer for only data services and offering unlimited voice in bundled plans. However, as the Authority has deemed fit to continue with cost based IUC charges, primarily on the grounds of insufficient technology migration, traffic asymmetry and a large number of existing 2G voice users, this IUC rate should continue to act as an implicit off-net voice tariff floor for TSPs.
3. In this scenario the concept of unlimited calls can only refer to on-net voice calls, there cannot be a concept of unlimited off-net calls. Thus, post implementation of the data floor tariff, the TSPs may be permitted to offer only unlimited on-net calls as a bundle. All off-net calls made available under the bundled plan should be clearly specified with limits in term of number of minutes and such minutes to be ascribed the minimum charge of the prevailing IUC rate for adherence to the floor value.



Q14. If a floor price is considered, should there be any floor price prescribed for bundled offers, including those having unlimited voice calls and data? Please give your comments with methodology and detailed justification.

RJIL Response:

1. Yes, as mentioned above, floor price should be applicable on all tariff offerings including bundled offers to ensure the sanctity and proper implementation of the data floor. As In case of bundled services, the service providers should be required to ascribe value to all line items bundled with data services and the residual value of a bundled data pack post deducting the ascribed value of such included items should be considered the cost of data for compliance with data floor price.
2. For instance, in case a bundled plan offers 1 GB data per day with 100 SMS and unlimited on-net voice calls and 1000 offnet minutes alongwith subscription to a video on demand app for 28 days. Then under this plan the value ascribable to offnet voice and offnet SMS cannot be lower than 6p/min and 2p/SMS. Similarly, the value to VOD or other apps should not be lower than their standalone values. All these values combined with the floor price for data should determine the pack value. GST would be applicable on top of this to arrive at a final pack value.

Q15. If a floor price is considered, should there be a price ceiling also to safeguard consumer interest? Please give your comments with detailed justification.

And

Q16. If your answer to Q16 is in affirmative, what should be the methodology used for fixing a price ceiling for mobile data service, voice services and bundled offers. Please give detailed calculations and justification for your response.

RJIL Response:

1. In the current market scenario of hyper competition, we do not foresee a scenario where the service providers will start charging way above the realized data floor tariffs thus there is no need of a ceiling to be prescribed right now.
2. Further, in case, at a later stage the Authority feels that consumer interest is not protected due to unexpected escalations in tariffs, then it always has the opportunity to revisit its own tariff order.



Q17. Should all the tariff plans (retail consumer, corporate, tendered or otherwise contracts, segmented and any other including one on one) offered by the TSPs be subject to floor price tariff orders? Please give detailed justifications for your answer.

And

Q18. How can it be ensured that all the tariff plans of TSPs (retail consumer, corporate, tendered or otherwise contracts, segmented and any other including one on one), comply with the floor tariff orders? Please give you response with detailed justification.

RJIL Response:

1. As mentioned above, all tariffs, without any discrimination, should come under the data tariff floor. We have already explained and given our suggestion on how this can be effectively implemented.

Q19. Any other relevant issue that you would like to highlight in relation to the above issues?

RJIL Response:

1. As mentioned in the General Comments, In order to maintain the sanctity of the floor price and have effective implementation of floor tariffs, the service providers should not be permitted to offer any segmented / "One-to-One" offer to circumvent the prescribed floor tariffs. Further, all such offers should be duly approved by the Authority under the proposed reporting requirements.

