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Subject: Consultation Paper on "Transparency in Publishing of Tariff Offers".

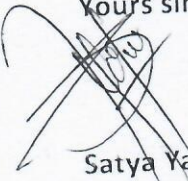
Dear Sir,

This is in reference to your Consultation Paper dated 27th November 2019 on "Transparency in Publishing of Tariff Offers".

As desired, we hereby enclose our response to the questions raised in your above-mentioned Consultation Paper. We hope our response will be given due consideration. We shall be obliged to address any further queries from your good office in this regard.

Thanking you and assuring you of our best attention always.

Yours sincerely,


Satya Yadav
Addl. Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
For Tata Teleservices (Maharashtra) Limited

Encl: As above

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TTL response to Consultation Paper on
"Transparency in Publishing of Tariff Offers"

Question 1: Whether TRAI should prescribe any format for publishing tariff? Please support your answer with rationale.

TTL Response:

The Authority must prescribe format to publish tariff to have standardization among all operator. Every operator will have different format for publishing tariff on different communication media which will create difficulty for customer to compare different tariff offering. Customer must able to see same format for all operator Tariff before choosing his final Plan. Tata Teleservices offers services to Enterprise and SME customers, where customer get final proposal in the prescribed format and give final PO after agreement on Tariff.

Question 2: If the answer to the Question 1 is yes, then please give your views regarding desirability of publishing tariffs on various modes of communication viz., TSP website/Portal, App, SMS, USSD message, Facebook, WhatsApp, Twitter, Customer care centres, Sales outlets etc. If the answer to the question is that tariffs should be published on multiple channels as above, please state whether TRAI should prescribe a separate format for each channel. Please also suggest the essentials of the format for each channel.

TTL Response:

Tariff Plan should be published on company web site and portal for easy access to customers. TSP can use may digital media communication mode to publish tariff for their potential and existing customers. It should not be compulsory to publish tariff on above mentioned medium.

As mentioned above, Tata Teleservices provide wireline services to SMEs and Enterprise customer who expect customized plans as per their requirement. Tata Teleservices can publish standard tariff on Web site while it is not possible to publish tariff on all social media.

Question 3: Whether the extant format prescribed for publishing tariff at TSP's website conveys the relevant information to consumers in a simple yet effective manner? If no, please provide the possible ways in which the same can be made more effective?

TTL Response:

TSP's website provides relevant information to customer while standard format prescribed by TRAI will furnish all required information for consumer.



Question 4: Whether the service providers be required to publish all the tariff offerings and vouchers in addition to the publishing of tariff plans, in the prescribed format? Please provide rationale for your response.

TTL Response:

Not applicable for Tata Teleservices' Enterprise business

Question 5: Whether there is a need to mandate TSPs to introduce a tariff calculator tool to convey the effective cost of enrolment and continued subscription? If yes, what can be the essential features of such a tool? If the answer is in negative, then please give reasons for not mandating such a tool.

TTL Response:

Tariff calculator tool should be available on website while in current scenario, most of the customers are on unlimited Plan, so calculator will not help much.

Question 6: Whether the service providers be asked to disclose clearly the implications of discontinuation of tariff plan after expiry of mandatory tariff protection period of six months on the provision of non-telecom services offered as a part of the bundle at the time of subscription to a particular plan? If yes, what should be the exact details that service providers may be required to provide in case of bundled offerings? If the answer is in negative, then please give reasons for not mandating such a disclosure.

TTL Response:

TSP invest their money in purchasing of Devices (Mobile, Router, EPABX, IPXB etc.) All bundle devices are provided with a specific Lock in period of tariff Plan to recover cost of devices offered free of cost. All conditions are mentioned in STC – Special terms and condition signed by customer at the time of agreement. Customer will not be allowed to exit within lock in period or ready to pay exit charges of Devices.

Question 7: Whether the service providers be required to provide a declaration while reporting tariffs to TRAI and displaying tariffs through its various channels that there are no terms and conditions applicable to a tariff offering other than those disclosed here? Do we require additional measures to ensure that all the terms and conditions are clearly communicated to the subscribers and the Authority? If the answer to the above is yes, then please provide your suggestions in detail. If you do not agree with the above requirement, please provide detailed reasons for the same.

TTL Response:



TSP provide complete information on Tariff provided to customer while for enterprise and SME customers, customized plans are offered with special terms & conditions which will be difficult to submit for each customer.

Question 8: Whether the service providers be required to publish details of all plans in the prescribed format including the plans not on offer for subscription but active otherwise? Please support your answer with rationale.

TTL Response:

TSP should publish standard tariff plan offered to all customers in a prescribed format. It is not possible to publish all plans of existing customers.

Question 9: Whether the service providers be required to update the information on point of sale and retail outlets simultaneously with the launch/change of a tariff offer?

TTL Response:

Not applicable for Tata Teleservices.

Question 10: Whether the tariffs published in prescribed formats are displayed on websites of the service providers in an effective manner? If no, should the manner of display on website may also be prescribed by the Authority? If it is felt that the manner of display on website may be prescribed by the Authority, please give your views on the proposed display framework.

TTL Response:

Already mentioned in reply to Question No. 2.

Question 11: What are your views on introduction of concept of unique id and requiring the service providers to link the tariff advertisements etc. with corresponding tariffs published in TRAI prescribed formats including requirements to publish dates of implementation of tariff and that of reporting of tariff. Do you think that any other safeguards need to be introduced? If yes, please elaborate. Please support your answer with rationale.

TTL Response:

Unique ID will help TSP and TRAI to track and monitor all Tariff Plan offered vs submitted to TRAI. Even a portal can generate auto ID after submission of Tariff on TRAI Portal.



Question 12: Whether the proposed monitoring and compliance mechanism is enough to deter any violation of compliance with applicable. If no, please suggest further safeguards that may be introduced to ensure a robust monitoring and compliance mechanism.

TTL Response:

Yes.

Question 13: Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

TTL Response:

Not Applicable.