

Mr. Kaushal Kishore  
Advisor (F&EA-I)  
Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan (next to Zakir Hussain College)  
Jawaharlal Nehru Marg (Old Minto Road)  
**New Delhi 110 002**

Dear Sir,

**Subject: TRAI Consultation Paper on 'Review of extant provision for sending the printed bills to consumers of landline and post paid mobile subscribers – Our views**

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We are representing M/s Garima Traders Private Limited, 304 Pawani Plaza, Khairatabad, Hyderabad, Telangana. I have done study on the paper industry and its environmental friendly nature. I am forwarding you a copy of the paper submitted in the International Conference on Environment and Energy, conducted by Jawaharlal Nehru Technological Univeristy, Hyderabad which shows that Paper is Environmental Friendly and Indian Paper Industry does not cut trees or forests as being informed by few Maharastra MPs and MLAs and social organiasations. I am enclosing the participation certificate and the paper submitted by me in the conference.

Paragraph 2.1 of the TRAI Consultation Paper on 'Review of extant provision for sending the printed bills to consumers of landline and post paid mobile subscribers' states that telecom service providers and their associations have represented:

"Environmental concerns relating to cutting of trees for papers used in printing of bills and changing mobile usage scenario in the context of massive surge in data usage on smart phone were put forth to bolster their demand, as the main rationale to this demand."

### **PAPER MANUFACTUREING NOT AT ALL ANTI-ENVIRONMENTAL AS BEING ALLEGED**

We have been vehemently raising our voice condemning the widespread myth that Paper Manufacturing is damaging the environment as several trees are cut from out of the forests and thus causing undue damage to environment. In the following paras we have ample explanations to prove our point.

The above argument does not hold ground as Paper is manufactured with the following major inputs

1. Recycled waste paper
2. Agricultural residue such as bagasse, rice straw.
3. Paper making in India is primarily agro-based.
4. From wood pulp which is made from out of the self-grown trees by Paper mills. Forests are not at all touched upon here.

Approximately 75% of the paper produced in India is from waste / recycled paper or agricultural residue as the primary raw material which contributes towards protecting the environment. If the agricultural residue and waste Paper is not utilised for making Paper, it will lead to environmental hazards for the country.

While the balance 25% is produced using pulp wood, we would like to state that unlike in some parts of the world, Paper industry in India is not a forest based industry but an agro/ forestry based industry engaging approximately 5 lakh farmers from whom more than 90% of the industry's wood requirement is sourced. Farmers grow trees on their lands as any other crop and sell their harvest to the Paper Mills. Majority of the wood is grown in backward areas and marginal land which is potentially not suitable for cultivation.

**From the above contentions of ours it is evident that Paper Manufacturing is not anti-environmental as alleged in the 24 representations received by you from Maharashtra.**

But still if TRAI and Telecom Operators are not clear on the subject, we suggest using Paper that is manufactured only from out of agricultural residue and waste paper. To name a few Paper Mills in this category are –

1. Tamil Nadu Newsprint & Papers Ltd., Kagitapuram, Tamil Nadu
2. Seshasayee Paper & Boards Ltd., Erode, Tamil Nadu
3. Bindal Papers, Uttar Pradesh
4. Trident Papers, Punjab.

and the like.

### **ISSUES FOR CONSULTATION**

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**A combined reply is pieced together hereunder for all your questions with justifications around.**

**There is no need to change the present Default option i.e., provision of Paper bill without any charge to postpaid subscribers of mobile and wireline services.**

Unlike developed countries the literacy rate in India still remains low and hence many consumers will not be using electronic media – e mail to view their bills. Even though usage of Smartphone is gaining momentum of late but still many will not be knowing as to how to download bills from smartphones.

India is still not fully geared to go in for Paperless medium as most of the consumers are either not educated nor they are mentally prepared for that.

**Moreover, hard copy of the bill will make it easier for consumers to make payments promptly as bills sent on electronic media are likely to get missed out leading to disconnections.**

**The reason for going Paperless on the misguided argument that Paper is manufactured by only cutting trees is not only incorrect but as also misleading the masses.**

**GST: There is GST on telecom services. There must be more than 20 crore people who will be claiming input credit of GST for which a hard copy of the bill is necessary. Here is where, a hard copy of the bill by Operator is needed. By contemplating to go paperless just amounts to shifting of responsibility rather than minimising of paper usage. There is possibility of errors in GST input credit as the percentage of errors will go up without a printed paper bill.**

**Subscribers must get hard copies of bills and not electronic bill as is at present.**

Even now some telecom operators are not sending paper bills on the pretext "Save Paper" posing themselves as Messiahs of Environment-Protectors whereas the facts are poles apart. If they really meant this, they should have grown trees all over the country from the monies saved out of not sending hard copies of bills which runs into thousands of crores.

There is more to digital than meets the eye. While paper is all around us and piles up in plain sight, the energy consumed in the manufacture of digital products, energy needed to power them and the toxic e-waste associated with their end-of-life, are largely out of sight and out of mind. In order for consumers to make informed and responsible choices it is important to be critical of claims that digital is greener than paper correspondence.

People often compare the entire footprint of paper with only the energy it takes to send or receive digital communication. However, they forget about the data centres, networks and the resources like nonrenewable metals and fossil fuels) it takes to complete the exchange.

Storing emails and attachments on a server may be convenient, but it takes an environmental toll. The longer the email is retained, the greater its impact on the climate.

As of now, only BSNL is sending bills through P&T which offers better services. Whereas, some private operators are sending bills through private couriers and we do not receive bills promptly leading to our paying late-payment fee. Therefore, TRAI must insist on all operators for sending bills only through P&T which will be a source of revenue to the ailing and feverish Postal Department.

While in other utility services such as electricity, gas, water etc., paper bills are being sent, why to discontinue in telecom sector.

The E literacy and percentage of e literate population according to the information provided by you in Chapter 3 is mere 40% in India which forces us to abandon E Bill Policy.

Senior citizen population which is more than 10 crores would continue to love to have hard copies.

**If the E bill system is adopted, there will be virtual chaos.**

To summarise, we feel that the entire exercise of E bills would prove futile as the grounds in favour of it are not true and fertile. The arguments in favour of e bills are lop-sided and do not represent true facts.

Therefore, the proposal of e bills may be dropped. And Paper bills be made mandatory even if a subscriber opts for e bill.

Thanking you

Yours faithfully,  
For **Garima Traders Private Limited.**

**(B.R.RAO)**  
**MANAGING DIRECTOR**