

From,

Mrs Rohini S Bhardde  
Shahunagar Satara.  
Maharashtra.

To  
Shri Kaushal Kishore,  
Advisor (F&EA-I), TRAI

Sir,

With reference to the Consultation Paper dated 15.11.2018 on review of extant provision for sending the printed bills to consumers of landline and Post paid Mobile subscribers, following few points are submitted for kind consideration please.

**1. As per the extant provision of TTO (46<sup>th</sup> Amendment), provision of hard copy of the bill or printed copy of the bill to postpaid subscribers is mandated as a default option. Is there a need to change the extant default option, i.e., provision of paper bill without any charge to postpaid subscribers of Wire line and (ii) Mobile services? Kindly support your answer with rationale.**

Reply: Sir, the referred 48<sup>th</sup> Amendment was issued on 24/01/2008. Since 2008, the telecom sector is changing like anything and day by day the charges for services have remarkably decreased and now the telecom services have entered in digital era.

**2. As against the existing practice of issue of printed bill to postpaid subscribers of (i) Wireline and (ii) Mobile service, unless a subscriber opts for electronic-bill (e-bill), should e-bill now be made the default option? And if so, why?**

Reply: Sir, now every sector is entering in new technology era. "Digital India" is the new theme of development.

Our Hon'ble Prime Minister is also pressing hard and making all out efforts to implement **Digital Economy** and insisting **Digital Transactions** in order to achieve more transparency.

Now a day everybody is conversant with email and it would be easy for the subscriber to maintain a proper record if the e-bills are issued on email towards services availed and charges levied by Telecom Service Providers. This will also promote paperless economy.

In case of any dispute or difference, about the e-bill, the subscriber can contact his/ her Telecom Service Provider through email with reference to the bill sent and can get the issue resolved. Court of law also now accepted the email as legal proof. So this procedure would not be doubted by anybody. This will also ensure transparency and accountability for TSP. Hence, e-bill shall now be made the default option.

**3. If e-bill is made default option then how the bills would be made available to Postpaid subscribers of (i) Wireline and (ii) Mobile services with (a) Subscribers of Feature phones and (b). Subscribers who do not have e-mail facility.**

Reply: Maximum transactions are now a day made on-line through internet like for Sales Tax/ Income Tax / GST etc. This shows that people are now adopting new technology and digital working in the daily life.

**Whats App** also can be used effectively to send the bills in PDF format to the subscriber through his registered mobile number with TSP if the subscriber does not have e-mail facility.

In case of non access to Whats App or Smart Phone, sms can also be generated for the billed services with option to Subscriber to visit nearest office/ customer centre of the service provider to have the copy of bill on paying nominal charges to encourage green environment.

**4. If a subscriber opts for e-bill and requests for change the option to printed bills, will there be a charge for providing the printed bill? Kindly provide reasons for your answer.**

Reply: The subscribers who do not have email facility in today's digital era may be charged some amount towards hard copy of bill.

Since the option for paper bill, will be contributing to environmental degradation and cause damage to the environment, to discourage the subscribers opting hard copy, it should be compensated by green cess charge to promote go-green initiative to avoid tree cutting. The environmental damage once caused cannot be recovered by paying any amount of money.

**5. What could be the safeguards for subscribers who do not wish electronic bills and prefer to get printed bills?**

Reply: Those subscribers opting for paper bill in hard copy who do not wish e-bill, may be charged with some amount as green cess as printed bill carries environmental cost.

**6. TRAI has mandated specified set of information to be printed on bills to postpaid subscribers. If the printed bill is not issued, then how the specified set of information will be conveyed to subscribers? Should the same be mandated for e-bills also? Kindly support your comments with justification.**

Reply: Any ruling norms/guidelines can be sent along with e-bills on email. Instant changes in the contents of the guidelines/rulings are possible instantly in e-bill email format which is not possible in printed bills. This will also boost Indian economy reducing paper consumption, reduction in tree cutting and will boost Go-Green movement

Also all relevant information can be prominently displayed on the web site of service provider.


7. Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

Reply: Issuing e-bills will be the best friendly solution for day by day degrading environment and will cause less tree cutting and less threat to the environment.

This would lead to a best step towards Digital India the mission of our Hon'ble Prime Minister and for Go-Green initiative.

In view of above, it is suggested that the said TTO may kindly be amended accordingly in line with today's digital thrust and need to conserve the environment and to change the provision for hard copy bill to the safest and economic solution of e-bill on email or bill sms and the mandate of e-bill to postpaid subscribers may be adopted as a default option instead of hard copy or printed copy of the bill.

With regards

  
(Mrs R.S. Bharde)

Copy for kind information to:

Shri Narendra Modi Ji, Hon'ble Prime Minister.