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CONSUMER CARE SOCIETY®

(Formerly Banashankari Consumer Protection Society)

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(Regd.under Karnataka Societies Regn. Act. 1960)

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June 3, 2008

Telecom Regulatory Authority of India
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Mr. Arvind Kumar telephone:011-23220209 and email traifn@yahoo.co.in.

Dear Sir,

Subject: Consultation Paper No. 10/2008 On Carrier Selection

We have studied the above CP and our comments are below:

General: This CP is very exhaustive and captures the essentials of the progress of the subject over the past several years and a continuous review of the subject matter over the past few years. Congratulations to the author and his team.

It would have helped us to study and comment in a more focused manner if against each CP Question relevant paragraphs in the CP were also indicated as is noticed in some CPs of TRAI

CP Chapter 5, issues for consultation:

Q1. Is there a case for implementation of carrier selection in today's environment?

Answer:

General:

With increasing competition and continuously reducing tariffs, need for carrier selection which was at an earlier point of time an important need has become far less important as of now.

However this facility will be an advantage provided it does not put service providers to an extremely costly or technical disadvantage and can be brought into practical use in reasonable time frame. Perhaps a comparison of latest tariffs between different service providers specially on NLDO and ILDO would have clearly brought out this point.

However having stated as above, undoubtedly carrier selection does offer some advantage and the Indian subscriber can also be provided with this choice of carrier, only if it is feasible economically and can be implemented in a reasonable time frame in view of the advantages explained by TRAI.

A reading of CP Chapter 1, section 3.2.1 Call-by-Call Selection with Default Carrier, and section 3.2.3 Call-by-Call, no default carrier, no pre-selection gives an impression that it is fairly easy and cost effective to implement them.

However, reading of CP and in particular, Chapter 2, Past efforts and issues in implementation of Carrier Selection and in particular, Sections 3. Developments so far and 4. Implementation Issues, explains the cost, technical, billing and other very important issues and complexities.

With several serious issues still remaining unresolved, there appears to be no sense in commenting on other Questions of the CP.

The subject matter of this CP requires to be under continuous review of TRAI and at a future appropriate time can be revisited.

With Regards

G S Gundu Rao
For Consumer Care Society, Bangalore