



# CAG

Citizen consumer and civic Action Group

## **Comments to the Consultation Paper on Review of Interconnection Usage Charges**

Please find here-below our comments to the Consultation Paper:

We are of the opinion that applicable date for BAK regime should be revised.

Reasons:

According to the paper, while a large number of telecom subscribers are progressively moving towards adoption of latest technologies, the change is gradual. There are quite a large number of consumers who do not have 4G capable devices. This could be due to choice, cost of phones, non-availability of 4G network, etc.

Precise dates and plan for all service providers to switch to 4G technology and provide 100% 4G coverage throughout the country should be finalised. Simultaneous/subsequent shift of consumers (around 90% at least) to 4G should happen. Date for applicability of BAK regime should follow this.

In addition, we would like to state that pushing consumers to switch to a particular technology defeats the main purpose of regulation, i.e., the consumers' right to choose. Different categories of consumers may want to use phones for specific purposes and it is important to provide options at affordable costs. If a consumer prefers to use a phone only for voice calls, without it being bundled with data, the choice should be made available to him.

Maximisation of consumer welfare and adoption of efficient technologies in a sustainable manner are vital for orderly/healthy growth of the sector.

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