

महानगर टेलीफोन निगम लि०

(भारत सरकार का उद्यम)

Mahanagar Telephone Nigam Ltd.

(A Government of India Enterprise)

CIN: L32101DL1986GOI023501



No: MTNL/RA/TRAI CP/IMRS/2020

Dated 22.06.2020

To

Shri Kaushal Kishore,,

Advisor (F & EA-I),

TRAI, New Delhi.

Sub: Comments on TRAI Consultation paper on" Regulation of International Mobile Roaming Services"

Sir,

Comments of MTNL on TRAI Consultation paper "Regulation of International Mobile Roaming Services" are as below:

Question 1: Should not the IMR service remain inactive at the time of issue of the SIM till the same is activated by the subscriber as a part of the IMR tariff-selection exercise? Please elaborate your submissions.

MTNL Comments: Yes. The knowledge of the exact status of the activation of international roaming is critical to protect consumer from any bill shock. Thus, if the IMR Service is disabled as a default and the same is activated only on the selection of tariff, the consumer would be forced to go through the applicable tariffs and would be in a position to make an informed decision.

Question 2: Should it not be mandatory to communicate the details of activation and applicable tariff immediately by SMS or email on completion of the tariff-selection exercise by the subscriber? Please give your views.

MTNL Comments: Yes, agreed. For the reason noted above it should be mandatory to communicate the details of activation and applicable tariff immediately by SMS or email on completion of the tariff-selection exercise by the subscriber.

Question 3: Should not the tariff details and related terms and conditions be communicated to subscribers of IMR service by SMS and /or email as soon as the phone is switched on in the visiting country by the subscriber. Please elaborate your views.

MTNL Comments: Yes, agreed. For the reason noted above the tariff details and related terms and conditions should be communicated to subscribers of IMR service by SMS and /or email as soon as the phone is switched on in the visiting country by the subscriber.

Question 4: Please give your views on the significant differences in tariffs for IMR Service under Standard Rates and IR Packs. Furthermore, your views are solicited as to how these two rates can be rationalized.

MTNL Comments: The significant differences in tariffs for IMR Service under Standard Rates and IR Packs can be rationalized by automatically activating IR pack benefits if the billing on standard rates cross the daily pack value.

Question 5: Should not the IR packs apply automatically the moment subscriber's expenses on IMR Services exceed the corresponding daily IR Pack rate unconditionally for all the countries for which the service provider is offering IR Packs?

MTNL Comments: Yes, IR packs should be applied automatically the moment subscriber's expenses on IMR Services exceed the corresponding daily IR Pack rate unconditionally for all the countries for which the service provider is offering IR Packs. This will rationalized the differences in tariff between standard rates and IR pack rates as well as it will also relief from the bill-shock trap to customer.

Question 6: Can IR Packs presently offered for one day duration be used to subscribe for multiple days to avail IMR Service? Whether the TSPs be mandated to permit combination of different IR plans as per requirement of the consumer? Please elaborate your submissions.

MTNL Comments: No Comments to offer.

Question 7: Why should not the IMR tariff be counted in 24 hour format on the first use of data, making or receiving a call or sending a text message and renewing the charges for only those 24-hour periods in

which the services have been used rather than on calendar day basis .? Please elaborate your submissions.

MTNL Comments: The method as suggested by TRAI can also be adopted, however such an arrangement may not be suitable for operators, keeping in mind that the IMR services are provided based on a wholesale inter-operator contract which may not have similar arrangements among operators. Moreover, as soon as a subscriber has switched on the device, the network is at work and therefore charging a subscriber on a calendar day basis is not wrong. With the advent of OTT platforms like WhatsApp, international roaming tariffs have already seen a steep decline for the operators, squeezing further their revenue sources should not be encouraged.

Question 8: In consumer interest why it should not be mandated for the service providers to send updates in respect of the data usage exceeding certain pre-established milestones such as 50%, 80%, 90% and 100% of the data entitlement? Please give your views.

MTNL Comments: Yes, agreed. Sending regular updates of the data usage should be mandated in consumer interest, particularly for the subscriber opting for a standard tariff regime instead of IR packs.

Question 9: Will it not be advisable to mandate the TSPs to inform the subscriber by SMS every time the subscriber lands in a country/area not covered by the IR Pack subscribed, of the fact of roaming in an uncovered zone, and the tariffs applicable thereto? Would the aforesaid requirement suffice or whether alongside this, the TSPs be mandated to keep the mobile data in the inactive mode and activate only in accordance with the directions of the subscriber? Are there any other measures that can be taken to cover the situation as detailed?

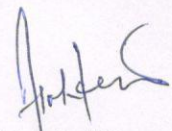
MTNL Comments: Yes. The knowledge of the exact status of the activation of international roaming is critical to protect the consumer from any bill shock. Thus, the IMR Service should be disabled as a default for uncovered countries/areas and the same should be activated only on the selection of a tariff. The consumer should be forced to go through the applicable tariffs and so as to make an informed decision.

Question 10: What are your views on the measures suggested in para 3.20 to protect the consumer from bill shocks dues to usage of services beyond the pack entitlements? Please provide your views on each of the above measure and suggest additional measures, which in your opinion can be helpful in addressing the issue.

MTNL Comments: To protect the consumer from bill shocks dues to usage of services beyond the pack entitlements, another daily IR Pack can be charged as top up if the usage exceeds the entitlements given in an IR Pack instead of levying the Standard Rates after the usage exceeds the plan entitlements.

Question 11: Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

MTNL Comments: No Comments to offer.



(Alok Kumar)
Manager (RA)