



Consultation Paper No. 20/2019

Consultation Paper on Transparency in Publishing of Tariff Orders



Submission of Written Comments and Responses

By

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RESPONSE TO CONSULTATION PAPER ON TRANSPARENCY IN PUBLISHING OF TARIFF OFFERS¹

Question 1: Whether TRAI should prescribe any format for publishing tariff? Please support your answer with rationale.

Yes, TRAI should prescribe format for publishing tariff. Currently, only tariff formats for the base tariff plans have been prescribed. With the special vouchers and packs gaining popularity, having a prescribed format would ensure transparency in communication to the customers. It would facilitate the competitive spirit among various service providers.

The consumers are not able to make informed decisions regarding the services they need due to the incomplete, unclear or inaccessible information. As a result the vulnerable consumers end up with services that they did not need or are not able to avail the best tariff deals, that is, paying more than they need to. This issue has been explored by various organisations across the world. In 2009, the European Regulators Group (ERG) in its report on “Ensuring Transparency of Tariff Information” dealt with the issue regarding transparency.² It highlighted that the consumers are not able to make choices and compare services. Information is either unavailable or deceiving to the consumers. This problem might also exist since the information is displayed in a complicated manner with special effects to attract consumers to certain tariff plans, multiple offers, services being bundled together and inadequate information being displayed by the service providers.

Ofcom, the UK regulator for telecommunications issued a review of Consumer Information Remedies wherein it stated that the manner in which certain information is communicated may have limited effectiveness. For instance, Ofcom had introduced schemes like Topcomm which aimed to assess the quality of service received by the consumers. However, it was presented in a format which was not as readily comparable as it could have been. This was worsened by low overall awareness of the information’s availability. Consequently, consumers tended not to seek out this information.³

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²Report on Transparency of Tariff Information, ERG (08) 59rev2 March 2009, https://berec.europa.eu/doc/publications/2009/erg_08_59rev_2_report_on_transparency_of_tariff_information.pdf visited on 20.01.2020

³Ofcom, A Review of Consumer Information Remedies, March 2013, https://www.ofcom.org.uk/_data/assets/pdf_file/0033/91698/information-remedies.pdf visited on 20.01.2020

These issues might be resolved with the introduction of prescribed formats by TRAI. The focus should be on providing the information in such a manner which is clear, comprehensible, accessible, trustworthy and timely.⁴ The need for providing formats is supported by the increasing popularity of special tariff plans and vouchers which contain complex information which might not be comprehensible for the consumer. Such formats would ensure that tariff information is communicated in a similar manner by all service providers which would promote the interests of the consumers as well as the competitiveness in the market.

Question 2: If the answer to the Question 1 is yes, then please give your views regarding desirability of publishing tariffs on various modes of communication viz., TSP website/Portal, App, SMS, USSD message, Facebook, WhatsApp, Twitter, Customer care centers, Sales outlets etc. If the answer to the question is that tariffs should be published on multiple channels as above, please state whether TRAI should prescribe a separate format for each channel. Please also suggest the essentials of the format for each channel.

Information can be communicated to the consumers through two methods namely, static and interactive.⁵ Publication of various plans online on the providers' website has been considered to be an effective tool of communication. Further, with the development of internet tools like the providers' App, Facebook, Twitter have also become easily accessible to the consumers. These modes ensure that information is distributed widely. Interactive communication customer care services enable consumers to interact with an informed personnel who might facilitate the consumers in resolving their needs. Direct communication through SMS, USSD message and publication of information at sales outlets are simple and transparent means to communicate information to the consumers. Thus, it would be beneficial for the consumers if the information is published on various modes of communication.

The format in which tariff is published on the static mode of communication should be different from the interactive mode. The purpose of publishing information on the static mode is to spread awareness regarding various plans, discounts and vouchers to the public. However, interactive mode of communication provides an opportunity of tailoring the services to suit the needs of the consumer. Thus, it might be advisable if separate formats are prescribed for the two kinds of modes of communication to ensure transparency and effectiveness in publication of tariffs.

⁴ [Supra note 3](#)

⁵ [Supra note 2](#)

There are certain essential features which should be included in either format namely, list of tariff schemes (subscription packages); subscription charge; call charges depending on time of day/week; call charges according to destination; subscription type (prepaid/postpaid); connection fee; data transmission charges; additional services; minimum contractual period; coverage (mostly for broadband and fixed telephony); data speeds; billing options; subsidised terminal offered on subscription; and any discounted/promotional offers.

Question 3: Whether the extant format prescribed for publishing tariff at TSP's website conveys the relevant information to consumers in a simple yet effective manner? If no, please provide the possible ways in which the same can be made more effective?

The extant methods are not enough by themselves. A wide range of methods and tools can be used by providers of electronic communications services to inform end-users, on an either mandatory or voluntary basis. Such channels of information dissemination, in the first category, includes publication on providers' websites, bills – and in particular itemised bills with a regulated minimum content – or leaflets sent along with them.

The instruments in the second category should generally target individual consumers, offer online and/or personalised assistance, like customer care service, instant billing control applications, voice announcements or acoustic signals when calling a ported/off-net/special tariff number or information sent via SMS or e-mail directly to the user. Provision of direct information to consumers in a targeted and personalised way through phone calls, letters, e-mails, SMSes, and interactive web applications can complement the general information requirements to be met by providers, in particular in relation with changes occurring after the entry in to the contract.

Web based methods can also be complemented by 'off-line' methods so as to reach a wide audience, especially where a material share of this audience may not have access to the Internet. Implementation of such methods either compulsorily (by laws or regulations) or voluntarily (via encouraging and guiding industry self-regulation) can empower end-users, helping them make informed choices which best serve their needs. This can be through the radio or newspapers, where tariff plans are explained in sufficient detail, or through infographic advertisements on the TV.

Some of the additional methods that could be looked into are: instant billing control applications, and voice announcements or acoustic signals. Billing control applications are quite uniformly made available by providers of mobile telephony, fixed telephony and Internet/broadband. Such an application allows customers to instantly view what services they

have used and the consumption volumes and calculate their expenses at any moment during the billing period.

Voice announcements or acoustic signals to notify the caller that he/she is calling a ported/off-net/special tariff number is also a good method. Such signals the caller that he/she is about to make a call that could cost more than expected and thus, gives a choice to the customer to make a reasoned decision.⁶

Question 4: Whether the service providers be required to publish all the tariff offerings and vouchers in addition to the publishing of tariff plans, in the prescribed format? Please provide rationale for your response.

Yes, they should be. They should allow for effective comparison of all tariff plans, so that customers can make informed decisions. Merely posting the updated details of tariff plans isn't enough. Thus, the service providers should publish the details of both plans that are on offer and that are not on offer, but active so that all subscribers may make informed decisions regarding the same.

Question 5: Whether there is a need to mandate TSPs to introduce a tariff calculator tool to convey the effective cost of enrolment and continued subscription? If yes, what can be the essential features of such a tool? If the answer is in negative, then please give reasons for not mandating such a tool.

The tariff calculator tool is used to convey the consumer the cost of enrollment and continued subscription and has been implemented in many of the developed countries as mentioned in the report. In all these countries, the consumer is seen to be complaining about hidden charges, misleading advertisements and ambiguous information regarding charges, etc. In lieu of all this, the need for a tariff calculator tool seems like a wise adoption for the Indian market.

Essential Features of the Tool

A tool designed to look for telecom networks should be focused on simplicity of usage. The essential feature of the tariff tool should be to display all the available subscriptions, plans, STVs, CVs available in a clear and easily comprehensible manner for a consumer. A consumer should be able to put his requirements for internet data, voice, messaging and other services and be suggested the best plans available suiting her needs. For many consumers, choosing a plan isn't a one-time engagement. There is an expectation to keep repeating the subscription to

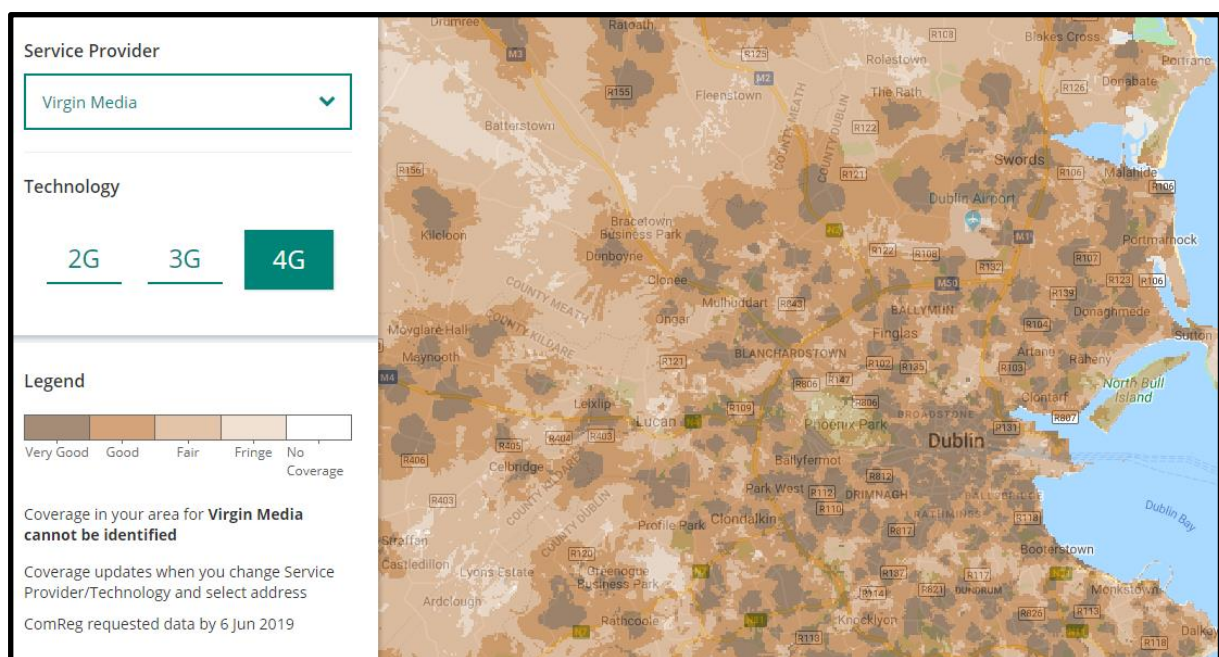
⁶Supra Note 2

a specific plan chosen once on regular intervals. Such a consumer would like to get the best possible service for least possible price. A calculator tool should come up with this optimal choice for the consumer and not show any other promoted service.

Along with the charges for the plans, the tool should highlight often neglected information like network coverage maps, data speed limits, network uptime, quality of voice/internet service, consumer complaints, etc.

- Network Coverage Map- Shows the density of telecom towers in a given area
- Network Uptime- This indicates the maintenance and service quality of a telecom provider
- Data Speed Limit- An indication of network strength and density.
- Consumer Complaints- Gives customers the idea about the problems faced by people using a particular service.

Tools which also include comparison with other service providers can be of major help to the consumers.



(The image above shows the 4G coverage of a telecom company - Virgin Media in the area of Dublin, Ireland.)

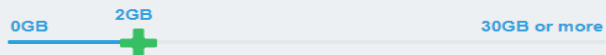
Example of a Tariff Calculator Tool

Billmonitor.com provides a very effective tool to compare and choose the best telecom plans in UK.

<https://www.billmonitor.com/consumer/calculator/>

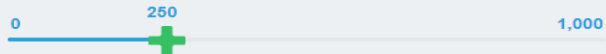
Tell Billmonitor how you use your phone to find the right contract

How much data do you use?



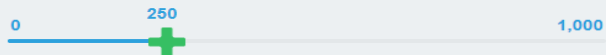
The average UK mobile phone user uses about 160MB of data per day or almost 5GB per month.

How many minutes do you use per month?



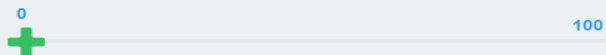
The average UK mobile phone user makes about 3 minutes of calls per day, which is around 90 minutes per month.

How many texts do you use per month?



The average UK mobile phone user sends around 30 texts per month.

How many picture messages?



Are you interested in any network technology in particular?

Choose as many as you'd like, or choose all

Any 4G 5G

Do you make calls to or from abroad?

NO YES

Do you want a specific handset?

YES NO, SHOW ME THE CHEAPEST SIM ONLY

Select which networks you'd prefer

Choose as many as you'd like, or choose all

Any O₂ vodafone TESCO mobile EE 3

FIND THE RIGHT CONTRACT

On a closer inspection of the links mentioned in the report, the task of providing the tariff calculator tool was made by independent authorities and private entities not associated with the telecom operators.

However, here are many factors proving that asking the TSPs to provide such a tool won't be an ideal way forward given the following possible outcomes

- If a market has 20 telecom companies, an individual would have to go to 20 different websites to look for the charges from each one of them
- The web interface and the formats for all these company websites will be different and it would be extremely cumbersome for an individual to look for a plan that suits his needs
- As tariffs and vouchers are frequently updated in a competitive market, a customer won't come to know about the new rates from a company X if he is subscribed to company Y
- A telecom company can very well choose to highlight some information over other using sophisticated tools, charts and graphs showcasing how their service is superior to others, beating the purpose of the exercise.
- The TRAI would then have to keep a constant watch over these websites for manipulations and deceptive techniques, adding significantly to the workload and oversight.

Probable solution could be assigning the job of designing and maintaining a standardized tariff calculator tool to one single private or public entity. The company under the regulation of TRAI, would collect information regarding telephone plans from all service providers and can display them in an unbiased way. The private/public entity for this could be chosen and employed on contract basis employed through free and fair E-auctions. The process prevents lobbying and malpractices and ensures fair-play in the designing and management process.

Question 6: Whether the service providers be asked to disclose clearly the implications of discontinuation of tariff plan after expiry of mandatory tariff protection period of six months on the provision of non-telecom services offered as a part of the bundle at the time of subscription to a particular plan? If yes, what should be the exact details that service providers may be required to provide in case of bundled offerings? If the answer is in negative, then please give reasons for not mandating such a disclosure.

As per the 2012 Tariff order, Telecom Service Providers cannot adversely change the tariff plan for a customer for a period of 6 months from the customer's enrolment. The situation that arises from this is that the service provider may change the plan after a period of 6 months, but this may be before the expiry of the customer's plan itself, which may lead to a scenario where the customer has to either discontinue a plan that they have already paid for, or they are forced to pay at new terms in order to continue the tariff plan. However, customers do not necessarily have the knowledge or the awareness of the possibility of such a scenario happening, and may not know that the period of protection for their plan extends to only 6 months. Therefore, **it is paramount that there be a disclosure of the implications of subscribing to a plan that exceeds 6 months.**

In order to decide the contents of such a disclosure, guidance can be taken from a United States District Court decision in *Federal Trade Commission v. AT&T Mobility LLC*,⁷ where AT&T, a major telecom company based in the US, reached a settlement with the Federal Trade Commission to pay \$60 million after failing to disclose limitations to its "unlimited data plan" provided to customers. This case did not only have a monetary settlement, but also an injunction, which prohibited AT&T from making representations about the plan without disclosing material limitations. Furthermore, it was also a requirement that the disclosures be "prominent, not buried in fine print or hidden behind hyperlinks".⁸

Taking inspiration from this, there may be requirements added to the Tariff Order stipulating clearly and conspicuously any restrictions that may apply to new plans, including possible changes after a period of 6 months, and the events that may trigger such restrictions or changes.

⁷Federal Trade Commission v. AT&T Mobility LLC, US District Court for the Northern District of California https://www.ftc.gov/system/files/documents/cases/att_mobility_llc_doc_201_2019-12-04_permanent_injunction_monetary_judgment_003.pdf visited on 20.01.2020

⁸ Federal Trade Commission, AT&T to Pay \$60 Million to Resolve FTC Allegations it Misled Consumers with 'Unlimited Data' Promises, Nov 5 2019, <https://www.ftc.gov/news-events/press-releases/2019/11/att-pay-60-million-resolve-ftc-allegations-it-misled-consumers> visited on 20.01.2020

Question 7: Whether the service providers be required to provide a declaration while reporting tariffs to TRAI and displaying tariffs through its various channels that there are no terms and conditions applicable to a tariff offering other than those disclosed here? Do we require additional measures to ensure that all the terms and conditions are clearly communicated to the subscribers and the Authority? If the answer to the above is yes, then please provide your suggestions in detail. If you do not agree with the above requirement, please provide detailed reasons for the same.

As stated in the Consultation Paper, there are situations where service providers provide tariff plans which are subject to certain terms and conditions, and these terms and conditions are not readily available to customers while purchasing the plan, forcing them to go to websites of service providers for these terms.

Considering that ordinary customers may not be well versed with the potential terms, restrictions and usage policies that are attached to a tariff plan, it would go a long way in providing transparency in tariff communication if all terms and conditions were provided to the consumer while subscribing to the tariff plan, and if there was a declaration regarding the same to TRAI. This would ensure that there is complete transparency in the telecommunications market and that consumers are not forced into conditions that they were not aware of.

As stated in the answer to Question 6, in the United States, the FTC required AT&T to disclose all restrictions on its unlimited data plan after it was held liable for hiding such restrictions to its customers.⁹ Ofcom, the UK regulator for telecommunications has a “voluntary code of practice” for broadband service providers, which mandates them to provide consumers realistic information at the Point of Sale and during the contract,¹⁰ and the Info-communications Media Development Authority of Singapore specifies minimum QoS benchmarks for broadband services and mandates operators to disclose complete set of information to consumers. Therefore, it is clear that mandating service providers to provide complete information is increasingly being employed as a tactic to increase transparency, and it is recommended that even TRAI employs such a model.

⁹ Supra note 7

¹⁰ Ofcom, Codes of Practice, <https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/codes-of-practice>

Question 8: Should the service providers be required to publish details of all plans in a prescribed format, including the plans not on offer for subscription but active?

Yes, the service providers should provide all the pertinent details of all plans in a prescribed format, including the plans not being offered but active because of the following reasons:

1. **Full Disclosure & Transparency:** Such a practice would be in line with principles of full disclosure and transparency. It would provide the potential subscribers with all the important details about all the current/ potential options.
2. **Informed Decision-making:** Such a practice would facilitate information dissemination and analysis. It would also prevent the pitfalls of information asymmetry between subscribers and service providers.
3. **Further consumer choice:** While protecting consumer welfare, such practice clearly broadens the basket of choices available to a subscriber.
4. **Prevent malpractices and deception:** It would act as a safeguard against the malpractices on part of agents or last-mile service/marketing agents who might attempt to reduce the basket of choices or mislead the consumer to choose only between the plans on offer. It also mitigates the perverse incentive for undue and misleading advertisement of only specific plans on offer while not informing the subscriber about all available options.

Question 9: Whether the service providers be required to update the information on point of sale and retail outlets simultaneously with the launch/change of tariff offer?

Yes. The launch or change of a tariff offer must preferably updated at all points at the same time. The main issue that arises when this is not done is that a provider may reduce tariffs but still take advantage of the earlier higher prices. The tariff may, at some point, be reduced either through competitive forces or regulatory orders. When a provider reduces prices due to competition, this is indicative of better or cheaper services being provided by a competitor. By allowing a lag in the updating of services across different points, it is the consumer who is least aware and unable to access the websites who is affected. In a span of three months, a consumer might choose the older, more expensive plan at least three times¹¹ simply because they may not have the information regarding newer plans. Assuming that a large proportion of telecom services are sold at retail outlets or other points of sale, this would allow a telecom company

¹¹ Taking an average prepaid plan length of 28 days, that would mean at least three recharges or at most four recharges.

to take advantage of the information asymmetry, further weakening the ability of a consumer to choose effectively.

Logistically, however, it may not be possible to update the information across each and every point simultaneously. It may take time to create, print, and effectively distribute information within a short period of time. What must also be kept in mind is that plans may change rapidly, perhaps multiple times within the span of a few months. Mandating more frequent updating of information might lead to wastage of resources and confusion due to overload of information to consumers. This, however, should not be used as an excuse to delay the timely dissemination of information. Keeping in mind the average length of a plan, it is highly unlikely that a consumer may wish to update his tariff plan more than once or twice a month. The consumer, therefore, will not be bombarded by new information, except at the time he goes to update his plan, which will be more infrequent than the rate at which tariffs may be updated or changed. Reducing the time, therefore, will not adversely affect the consumer, but will only help them. The following example will better illustrate the above proposition. A provider's lowest tariff, on January 8, is T_1 which is valid for 28 days. On January 9, the provider revises his prices to bring it in line with other competitors, and launches a new tariff T_2 , where the price of $T_2 < T_1$ while other factors are same. Although the new tariff details are immediately updated on the website and customer care centers, the same only needs to be updated at points of sale and retail outlets by April 7. During this period, a customer, whose earlier tariff plan ended on the 8th of January, might purchase T_1 , the more expensive tariff, at least 4 times until 7th April.¹² If the provider is required to update the tariff details within a week, then the consumer might only opt for T_1 the first time, during the month of January, but will ideally be able to pick the lower tariffs the other three times. Even if the information changes several times, after the first recharge, the consumer will only visit the outlet after a month, and at that point will pick the cheapest plan available, regardless of how many changes took place in the interim period. Presently, a three-month delay is permissible between launching a new or updated tariff and publishing the details across all points. Ideally, this must be reduced to zero-delay across all points. Practically, however, a shortening of the time period to any period shorter than the duration of the average tariff would be sufficient to protect the interests of the consumer. If the average duration of a tariff plan is 28 days, then the within which updating must take place should be no longer than 28 days within the launching of the new tariff plan. Ideally, 15-20

¹² First on January 8, then on February 5, then on March 4, and then on April 1 (assuming leap year).

days should be suitable, keeping in mind the interests of both the consumers and the service providers.

Question 10: Whether the tariffs published in prescribed formats are displayed on websites of the service providers in an effective manner? If no, should the manner of display on website may also be prescribed by the Authority? If it is felt that the manner of display on website may be prescribed by the Authority, please give your views on the proposed display framework.

No, currently the websites of service providers do not show the tariffs in an effective manner. These websites are geared towards driving the consumer to the few select plans and vouchers that the company wishes to promote and so it is tough for the consumer to conclusively find the optimum plans.

The decision making and comparison of different services and networks can be improved if all telecom websites follow a standard protocol in displaying the tariffs. So yes, the manner to display them on the websites can be prescribed by TRAI.

However, we must be cognizant of the fact that different companies would want to highlight different aspects of their services on the websites. So we suggest that **all websites have a special tab** with the charges displayed in TRAI prescribed format with the proposed display framework. This would provide the companies complete independence in designing their websites, while also ensuring that consumers get the necessary information and comparison tools easily.

Proposed Display Framework

The tariff plans should all be arranged in a simple tabular format with all the details like internet data, voice, messaging, etc. arranged in columns. The tables should use a prescribed standard font, font size, background and text color for ease of reading.

The consumer should be able to filter and sort the tariff tables according to their choice- price, validity, areas of coverage, quantity of data, messaging, etc.

The consumer should also be able to cross-reference the plans on TRAI's website and compare them against similar plans offered by other rival companies.

Further policy suggestions for future:

Bringing recharge intermediaries under TRAI's ambit

Along with TSP websites, a significant proportion of consumers make use of recharge intermediaries' websites to get information about available subscription plans. We would also suggest that TRAI should work to make sure that these websites follow the same guidelines and regulations developed for the TSPs.

Example of a Proposed Display Framework

Comreg.ie - (The Communication Regulation in Ireland) provides a tool to view all subscription plans from telecom operators throughout Ireland.

<https://www.comreg.ie/compare/#/results>

Provider	Plan Name	Data	Minutes	Texts	Contract	Upfront Cost	Average Monthly Cost
Tesco Mobile	€5 Top-Up	0 MB	0 minutes	0 texts	Top-up (no contract)	€0.00	€5.00
eir	Simply Top Up Free eir Calls + 30MB Internet	30 MB	0 minutes	0 texts	Top-up (no contract)	€0.00	€5.00
LycaMobile	National S €9	1 GB	300 minutes	300 texts	Top-up (no contract)	€0.00	€9.00
Three	3Pay - €10 top-up	0 MB	0 minutes	0 texts	Top-up (no contract)	€0.00	€10.00
Virgin Media	Virgin Mobile 2GB SIM Only - Non Virgin Media Customers	2 GB	250 minutes	250 texts	1 month contract	€0.00	€15.00
Vodafone	Smart Extra	6 GB	10,000 minutes	0 texts	Top-up (no contract)	€0.00	€20.00

(Display Framework of Tariffs for Telecom Operators on comreg.com in Ireland)

Question 11: What are your views on the introduction of the concept of unique ID and requiring the service providers to link the tariff advertisements with corresponding tariffs published in TRAI prescribed formats including requirements to publish dates of implementation of tariff and that of the reporting of the tariff? Are any other safeguards required?

Assigning unique IDs and linking it to TRAI might not be effective in ensuring that information is effectively disseminated to consumers. Even though the TRAI website might contain all the required information in the prescribed format, the possibility that a consumer actually moves away from the website they are viewing the plans on, to another one with required information, is quite low. TRAI could, perhaps, host the details of different plans and link each plan back to the website of the operator in order to ensure that it is effectively used. A comparison tool will have to be built by TRAI if it intends to host the details of the different plans of different operators within its own website. Such a plan would mean that the steps involved in purchasing a plan would be as follows:

1. A consumer who wishes to purchase a plan will first visit the operator's website and select a plan listed therein;
2. He would then be redirected to the TRAI page on the same plan, which would also contain a detailed comparison of other tariffs offered by the operator, along with tariffs provided by other operators, but within the price range of the tariff chosen by the consumer;
3. If the consumer wishes to proceed with the purchase after viewing the comparison, he may click on the plan on the TRAI website, which will redirect him back to the operator's website, where the transaction can be completed.

Registering plans with unique IDs will permit the above, giving consumers far greater information regarding plans. This will also ensure that a neutral platform provides effective comparison and information regarding the choice of tariffs.

Another alternative in order to effectively provide information would be to provide it in the specific format prescribed by TRAI, within the website of the provider itself, as opposed to redirecting the consumer to a different website. Presently, tariff details are presented in custom formats, without providing for an easy method to compare different plans.¹³ Some present the details of the plan in their own format, while some use the prescribed format, but don't provide

¹³

<https://www.airtel.in/prepaid-tariff>; <https://www.jio.com/en-in/4g-plans>;
<https://www.ideacellular.com/prepaid/plans-packs/unlimited-calling-internet>

tabular comparisons. By mandating that all plans be displayed only in a specific format, TRAI will not have to host the details of the plans themselves. Presently, even if the details are presented in the prescribed format, it is only as an addendum used for fulfilling regulatory requirements. By barring the display of tariffs in any format other than the one prescribed by TRAI, consumers will be able to be better informed.

Such a move would, undoubtedly, disturb the overall layout and existing structure of different websites. The prescribed format, therefore, may be altered slightly in order to ensure uniformity. For instance, having the requirement that only plans within a certain price-range or feature-range (as selected by user) need to be displayed when comparison of tariffs is to be provided would allow operators to maintain the overall design of their websites. TRAI may also notify a new prescribed format for websites which shall contain only the most crucial information such as dates of the plan, the price, features, etc. Such a format would certainly be superior to the present system.