

From: nchsebpl@gmail.com
To: "Amit Sharma" <advfea1@traf.gov.in>
Sent: Wednesday, August 14, 2024 3:36:29 PM
Subject: Comments on "Consultation Paper on Review of Telecom Consumer Protection of Regulations (TCPR), 2012"

To
Shri Amit Sharma,
Advisor (Finance & Economic Analysis)
TRAI, New Delhi

Dear Sir,

NCHSE, Bhopal as a CAG (Regd. No TRAI/CAG/11/2013/CA dated 17th April, 2023) has the following comments to offer on the above cited consultation paper and hope will be useful in finalising the guidelines in connection with TCPR- 2012.

Question 1: How do current tariff plans offered by telecom service providers align with the preferences and usage patterns of consumers, particularly elderly individuals? Please justify with rationale.

Ans : Almost all TSPs are offering mix vouchers not keeping, the guidelines of TRAI offering 4 different types of vouchers. Sometimes it confuses customers which vouchers they should take. In this situation, what retail outlets not the service centers of TSPs, told to consumers, they accept resulting not fully use the value of money they spent on purchasing vouchers. The retail outlets are easily approachable by customer at large, specially the elderly people and women. The situation in rural areas is even worse. The customer totally dependent on retail outlets only, therefore should be :-

- A. Restriction on number voucher that TSPs, lot to consumers
- B. Its validity and usage pattern must be displayed by every retail outlets authorized by the TSPs
- C. It will be more effective if services offered by TSPs are published in the News papers on monthly basis and adhered the date for publishing such information on fixed date.

In the past such move was also offered but could not be implemented.

Question 2: Is there a need for separate plans for Voice & SMS and data to meet the specific requirements of subscribers. Please justify with reasons.

Ans : There was urgent need for separate plans for voice & SMS and data etc., specially from rural areas. Where we conducted CAPs in the past most of the customers complaint that they were unable to use the full data before the expiring of its validity. The reasons behind were frequently power shutdown so the internet services were not available all the time and secondly validity was of short period. Therefore it is suggested that there must be separate plans for voice & SMS and data etc. Another argument behind this that use of data is being mostly done by students and people on executive posts, research scholars etc. whereas in general most of the telecom consumers including the women need only that plan which has voice and SMS facility only.

Question 3: Whether the maximum validity of Special Tariff Vouchers (STVs) and Combo Vouchers (CVs) should be increased? Please Justify your response with reasons.

Ans : Presently the Special Tariff Vouchers has a validity of 90 days only and in this period most of the telecom consumers may not be able to use full data and the reasons of that have been given in the comments of Question no. 2 Therefore it is suggested that validity of Special Tariff Vouchers should be increased without any increase the cost prevalent at present from 90 days to 120 days.

In cases of Combo Vouchers also the same criteria should be followed, so that the pattern of uses of STVs and CVs may not disturbs. Otherwise if the validity of any voucher is increased the majority of telecom consumers may shift to that voucher.

Question 4: Are there specific consumer segments that would benefit from longer validity periods for Special Tariff Vouchers (STVs) and Combo Vouchers (CVs)? Please Justify along with rationale.

Ans: Yes, The consumers of rural area will definitely be benefited from longer validity period. The students and scholars may also be benefited. The area which we generally ignore is the house women. They have time constrain to use this facility and if validity period is increased they will be mostly benefited.

Question 5: In the current scenario, where dealers are doing recharge of vouchers online instead of selling physical vouchers. How relevant is colour coding of physical vouchers? Please justify with reasons.

Ans: In the present scenario mostly the transaction take place on line whether it is on line purchase of good & services or some property dealing. The same situation is with the recharge vouchers. The colour coding of Physical vouchers is irrelevant in the present situation.

Question 6: Whether colour coding can be introduced in digital mode to enhance consumer convenience and clarity? Please justify your response with rationale

Ans: We don't think that colour coding if introduced in digital mode will enhance consumers convenience and clarity. If we look the share of urban and rural population using smart phone, hardly much difference now. Rural mobile users still dependent on retail outlets to recharge vouchers.

Question 7: In the present situation where recharge of vouchers is carried out through digital mode, is there any relevance of reserving denomination of Rupees Ten and multiple thereof only for Top up Vouchers. Please justify with reasons.

Ans: Most of the recharge vouchers of TSPs are in odd figures and the plea for that it is due to GST. So if we insist of reserving denomination of Rupees Ten and multiple there of only for Top up vouchers, we don't think that it will ease to customer much while recharging voucher through digital mode.

Question 8: Whether all types of vouchers can be allowed to be offered in any denomination of the choice of service provider? Please Justify along with rationale.

Ans: Instead of reserving denomination of Rupees Ten or so it will be better if we insist TSPs to reduce the number of vouchers. If there will be only two Top Up Vouchers in the marker than it will be easier for telecom customer to select one. At present there are number of vouchers with different validity periods which generally confused the customer and in such a situation what the retail outlet person told the customer, they agree to it without assessing the requirement/ need.

In this context we suggest the necessary instructions to TSPs, should be issued that all tariff plan vouchers must be communicated to concern CAGs and if any change is there, it should also be communicated. This exercise should be on monthly basis with fix date. This will have an update information with CAGs in solving telecom consumer problems and more over have some restrictions on TSPs in issue fresh vouchers in future.

Regards,

R.Chandra
Sr. Fellow

