

Question 1: Do you think that the measures prescribed currently are adequate to ensure transparency in the tariff offers made by TSPs? If not, then, what additional measures should be prescribed by the TRAI in this regard? Kindly support your response with justification.

Answer 1- The measures are adequate but it is required to be properly implemented on the part of TSPs.

Question 2: Whether current definition relating to “nondiscrimination” is adequate? If no, then please suggest additional measures/features to ensure “non-discrimination”.

Answer 2- No, it needs to be elaborated further.

Question 3: Which tariff offers should qualify as promotional offers? What should be the features of a promotional offer? Is there a need to restrict the number of promotional offers that can be launched by a TSP, in a calendar year one after another and/or concurrently?

Answer 3- Promotional offers may consist of additional offers apart from regular offer in “Non Monetary” form.

Question 4: What should be the different relevant markets – relevant product market & relevant geographic market – in telecom services? Please support your answer with justification.

Answer 4- Relevant Product Market may be considered as the relevant markets.

Question 5: How to define dominance in these relevant markets? Please suggest the criteria for determination of dominance.

Answer 5- Dominance can be defined by the position of strength of an enterprise in the competitive market.

Question 6: How to assess Significant Market Power (SMP) in each relevant market? What are the relevant factors which should be taken into consideration? 30

Answer 6- As per the para 3.4 in the concerned 'Consultation Paper', SMP can be assessed in the relevant market.

Question 7: What methods/processes should be applied by the Regulator to assess predatory pricing by a service provider in the relevant market? Question 8: Any other issue relevant to the subject discussed in the Consultation Paper may be highlighted.

Answer 7- Process-

- Delineation of relevant market,
- Assessment of dominant position/significant market power (SMP) in the relevant market; and
- Evaluation of whether the dominant enterprise is resorting to pricing below Average Variable Cost (AVC) with the intention of driving out competitors from the market.

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