

Comments from Sh. Probir Roy

Dear Shri Manish,

Here are some brief comments on the aforesaid mentioned Consultative Document forwarded to members of IAMAI/PCI:

- (1) The charges from TSP's are stated to be within the range of 0.25 (TRAI suggestion) to Rs 1.50 (SBI/ICICI) to the customer. Later on in clause 1.14 a tariff of 0.25 is stipulated as the desired tariff. Kindly clarify.
- (2) Stakeholders as defined in section 2.4 need articulation (a) Non Bank PPI's (b) USSD Aggregators, and TSP aggregator(s), and (c) NPCI. Their roles have not been defined. They have a critical roles in ensuring a robust business model emerges.
- (3) Question 2: Yes. TSP should facilitate not only banks, agents of banks, **but also allow Non bank PPI's as end users** who will then bring desired interfaces/integration/business models with third party USSD aggregators/TSP aggregators to leverage their respective P2M, P2P transactions of their significant customer base. Without having to solely depend on ONLY NPCI. This will allow TSPs to cater to a ready made larger catchments of prepaid wallet users – who are already comfortable with cashless transactions (and who are early adopters) for their day to day hygiene work.
- (4) Question 3: TSPs should charge customers, or give option to customers, for this service on a either a pay per session basis (for prepaid subs), **or at a flat rate as built into their Value Packs every month for their post paid audience or both.** Normally each USSD session (may) involve several transactions. The charges however must be for each single session regardless of number of transactions in that in session, or duration (or, up to a maximum duration)
- (5) The customer has to see value in this seamless , interoperable and ubiquitous service and the comfort & convenience of it. **Therefore there should be no minimum or maximum caps for such tariffs and allow for a healthy price discovery system to play out and engender competition amongst the ecosystem of various service providers i.e. TSP, Banks, banks agents and Non Bank PPI's.** This will help unbundle the hidden value. Else, for low price or zero cost services. Customers are inclined to perceive these as of little value regardless of the functional or inspirational needs that it caters to..
- (6) Question 4: Yes

(7) Question 5: Yes

Probir roy

Co Founder/promoter-Director