

Vodafone's Response to Draft Amendment (Fifteenth) to TCCCPR

We have been partnering with TRAI for curbing the issue of UCC since 2007 when the first UCC Regulation was issued. Since then, the Regulation was reviewed in 2010 and thereafter 14 amendments have been issued.

We would, at the outset, reconfirm our support for working towards mitigating this issue. Barring one amendment related to penalties on operators, where we have a differing opinion, we have supported all efforts and taken proactive initiatives in curbing UCC.

Through this amendment, it has been proposed to formalize the process of restoration of telecom resources which have been disconnected by the service providers on the basis of this Regulation. We would like to categorize the disconnections under the following two heads:

1. Disconnection and blacklisting of the unregistered TMs for initiating the UCC (on the basis of 12th amendment)
2. Disconnection of Entities/Contact numbers mentioned in the content of the UCC (on the basis of 13th Amendment)

We would like to focus our response on the second category of disconnections i.e., disconnection of the 'Entities' based on the 13th amendment.

We anticipate that the proposed introduction of Rs.500/- as the restoration charges per telecom resource might lead to further complexities. The entity, whose number has been disconnected, may opt to take new numbers instead of paying the restoration charges. This is because, while the best intention and efforts of the entity may lead to a reduction in the UCC complaints, there is no way to exercise absolute control and a few complaints would still be received which would re-expose the entity to another round of disconnection/restoration charges.

We also wish to highlight the fact that due to this Regulation, a fear has set in amongst all business enterprises and corporations (including the responsible organizations as well as organizations not involved in any sort of promotional activities) because no entity can ensure absolute control over an employee's action. Consequently, we are observing a trend wherein corporate entities are requesting their employees to take mobile connections in their individual names instead of taking connections in the entity name.

This fragmentation is a market distortion and will have a detrimental effect on the way operators will be able to serve large/ bulk customers in providing SLA driven high quality

services. This will consequently lead to a degraded customer experience and as well as have a negative effect on our business.

We therefore strongly urge the Authority to re-consider the proposal and not to notify a restoration charge on entities disconnected under the 13th amendment.

Further, if it is the view of the Authority that the proposed Regulation is to be applied en-masse (as piece meal imposition would lead to unnecessary and undesirable complexity in the Regulation), then we would like to submit that the restoration charges may not be imposed at all. This is because the process laid down by the Authority for such restoration coupled with the final decision on restoration or otherwise resting with the Authority will ensure that connection of only those entities are restored who have satisfied the Authority on their bona fides.