

YUDOFUD COUNTER COMMENTS TO TRAI CONSULTATION PAPER ON CERTAIN ISSUES RELATED TO TELECOM TARIFFS

Title	: ChangeMyNetwork.com for Telecom Regulatory Authority of India		
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Description	: This document describes the Counter Comments to the initial comments posted by various stakeholders as a part of their response to TRAI's Consultation Paper No. 12/2010 on 'Certain Issues relating to Telecom Tariffs' released on 13 th October 2010.		

General Responses

This section provides general counter comments for issues that have been commented on by all stakeholders as a part of their response to TRAI's in its Consultation Paper No. 12/2010 on 'Certain Issues relating to Telecom Tariffs'. While we would not like to go into each and every answer the following is a high-level general summary that we would like to provide based on reading all stakeholder comments.

- In general we agree with the general common sense principles of low touch regulation as put forth by most Operators and the COAI and AUSPI
- The problem as identified is about **enforcing regulation that has already been devised and not new regulation** and as mentioned in TRAI's consultation paper (section 2.8 of Consultation Paper) just as PayPhonePlus which acts as an external agency to carry out day to day regulation for Ofcom in the UK, TRAI should also have an agency to carry out day to day regulation
- Endorse an almost across the board resistance for a **One Standard Plan for All Service Providers** as it is **not advisable**. We believe it tries to evade the problem of providing information to a subscriber segment by pushing the onus onto Network Operators thus dampening a truly competitive spirit
- Endorse views that have said that an existence of large number of tariff plans and offers in the market are beneficial for the subscribers
- Though we initially believed that there should be no cap on the number of tariff plans on offer and the cap of 25 should actually be lifted totally as it moves the onus on the Operator to market the plan. However, for practical purposes the **existing cap of 25 can be allowed to continue to exist**