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To,

Advisor (F&EA),
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No.: BSNLCO-RGLN/29/2/2020-REGLN Dated: ¹⁶15-08-2024.

Sub : Consultation Paper on Review of Telecom Consumers Protection Regulations (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.

Comments: At present, customer's approach, requirement and expectation have changed significantly as compared to the time when this Regulation was introduced in 2012. The current provision of the Plan Vouchers has become confusing and cumbersome to be understandable even to the educated people and also the people related to telecom sector itself. The current Voucher system is not consumer friendly, especially to the elderly and illiterate or less literate consumers.

Presently, at the time of enrollment of customer, the tariff plans (Plan Vouchers) are chosen by the customer considering the freebies and the validity offered through the Plan Voucher. The customer does not opt for a Plan Voucher considering the base tariff offered with it.

This is due to the fact that presently most of the vouchers including Plan vouchers are providing unlimited freebies in voice, SMS (100SMS/day) and Data, so the underlying base tariff is never operated during the whole validity of plan. Thus, Plan vouchers are essentially used as STV to get a particular freebies. The customers are not recharging/ Top-Up considering the base tariff offered in the Plan.

Hence, it is suggested that only two Plan Vouchers should be allowed, one to enroll in "per minute" pulse plan and another for "per second" pulse plan with some limited validity. Further, there should be no freebies allowed with the Plan Vouchers (subject to condition that the all types of STVs are allowed with validity up to one year or more). The Plan Voucher recharge should be allowed only once, i.e. at the time of enrollment of new customer at a nominal cost of Rs. 20 to Rs. 30. This will also address the issue of restricting the existing ceiling of 25 active Plans per LSA.

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.

Comments: Based on the comments of Question 1, customer need separate STVs for voice, SMS and Data with validity up to one year or more not the Plan Vouchers.

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TRAI has already facilitated the Data consumers by mandating annual Data STVs. The same may also be extended for voice and SMS. Based on its requirement, a customer may obtain any combination of voice, SMS and Data STVs or used an STV with all the freebies in it.

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

Comments: In the prevailing market conditions, the customers are opting Plan Vouchers essentially as STVs to get a particular set of freebies for a particular duration (i.e. validity).

The maximum limit of 90 days for STVs (except Data STVs) and Combo Vouchers is causing great inconvenience to the customers. Hence, the maximum validity of STVs should be extended up to 730 days (or two years).

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.

Comments: Yes, with longer validity most of the customer segments will be benefitted, especially elderly customers, security personnels posted in hard terrains, remote villages etc. The longer validity Special Tariff Vouchers (STVs) and Combo Vouchers (CVs) will be convenient options for subscribers to get rid of frequent recharges/ Top-ups.

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.

Comments: With the high degree of penetration about digital awareness and usage of digital means among the general public, the physical vouchers are now obsolete. Almost all the sales chain are selling the vouchers online. The use of physical vouchers is negligible and customers have ample clarity on the type of plans to distinguish them by their nomenclature. So, there is no relevance of colour coding of physical vouchers.

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

Comments: The online mode of recharge like self-care mobile APPs and websites are generally used by the educated people at large and they are able to distinguish different types of vouchers from given voucher descriptions and are able navigate to desired vouchers fulfilling their requirement. Whereas, the less educated or uneducated people recharges through franchisees/retailer network who make them understand the offered information in recharge vouchers.

So introduction of colour coding in digital mode will not be much helpful and effective in enhancing the customer experience. Also it may be noted that design of navigational process on mobile APPs and websites are so convenient that vouchers are segregated in separate tabs as Voice/Combo/DATA Vouchers for customers.

Even, if the colour coding is introduced in digital mode, then educating the mass especially illiterate people, will be challenging and require extensive advertisement campaign.

Question 7: In the present situation where recharge of vouchers is carried out

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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.

Comments: In this era of unlimited freebies, most of the people are using vouchers with unlimited freebies. The customers using Top Up for voice call/ SMS along with reduced tariff STVs are very less. Now usage of Top-Up vouchers is very limited, hence reserving all the denominations of multiple of Rs.10 for Top Up does not seem to be relevant now. However, 3 or 4 denominations such as Rs.10, Rs.20, Rs.50 and Rs100 may be reserved for the Top Up for the sake of continuity of previous scheme and freeing rest from multiple of Rs.10 for other vouchers.

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.

Comments: As per the comments from point no. 7 above, 3 or 4 denominations such as Rs.10, Rs.20, Rs.50 and Rs100 may be reserved for the Top Up for the sake of continuity of previous scheme and freeing rest from multiple of Rs.10 for other vouchers specially STVs as they are the most frequently used vouchers and remembering the vouchers in the denomination of multiple of Rs.10 is easy and also exchange of money will be easier.



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(Ved Prakash Verma)
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