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## FEDERATION OF CONSUMER AND SERVICE ORGANIZATIONS

Promoted exclusively to deal with the pressing issues..

(Regd. No.CAG/01/2016 as a Consumer advocacy group with TRAI)

No.5, 4<sup>th</sup> Street, Lakshmipuram,  
Tiruchirappalli – 620 010. T.N. State .

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The Chairman,  
Telecom Regulatory Authority of India,  
Jawaharlala Nehuru Marg,  
New Delhi – 110 002

11.02.2017

Kind attn to: Shri Sanjeev Banzal,  
Advisor (Networks, Spectrum and Licensing), TRAI

Sir,

Sub: forward counter comment on the consultation paper on “Issues  
Related to Closure of Access Service – reg:

We express our sincere thanks to the TRAI for its suomotu initiative in this issue. In this regard, we submit the following as the counter comment for your kind consideration.

1. *The Clause 30.3(b) of UL may be modified to*

*“Licensee may discontinue any of the service, under a Service Authorization, to its subscribers, by giving notice to Licensor and TRAI of at least 90 Calendar days in advance with reasons. In that case it shall also notify its entire subscriber by sending a 60 Calendar days notice to each of them. The effective date of discontinuity of Service will be 91st Calendar days counted from the date of receipt of such notice by the Licensor. The Licensor reserves the right to reject such request.”*

2. The subscribers may be given sufficient time to exhaust their balance talk time and migrate to some other network before discontinuation of service, the advance notice period to the subscribers may be considered for enhancement to 60 days

3. The subscribers may be informed about the closure of services/ change of access technology in transparently by sending regular SMS in English as well as local language. It may also publish through the local and popular regional language news papers enable to reach the people in gross route level.

Regarding your Question number 6.

In any case the subscribers should not be suffered for the decision of their TSPs by way of either change of technology or their closure. In such cases, all subscribers should be allowed to port out the serving network once the TSP has notified. This should be allowed irrespective of the time period spent by the subscriber in the network to be closed.

Regarding Question number 7:

The TSPs should ensure that the unused talk time balance and other benefits to remain continue to the subscribers, when a TSP changes the access services technology and asks his subscribers to migrate to newer technology.

Regarding Question number 11:

This may be transferred with the consent of the subscribers, if they not willing to transfer as per the wishes of their TSP, The subscribers may be given sufficient time to exhaust their balance talk time and migrate to some other network before discontinuation of service, the advance notice period to the subscribers may be considered for enhancement to 60 days.

Regarding question number 12:

No, it will be against the interest of subscribers and any transfers with the consent of the subscribers.

Regarding Question number 13:

We really appreciate the initiative of TRAI in introducing and addressing the numbers of subscribers as well as TSPs issues. It would highly appreciate if arrange in getting more response from the consumers side.

Thanks and regards.

M. Sekaran

President.