



COAI's counter comments to TRAI's consultation paper on "Review of Telecom Consumers Protection Regulations (TCPR), 2012"

We thank the Authority for providing us with the opportunity to share the counter comments to the Consultation Paper on "Review of Telecom Consumers Protection Regulations (TCPR), 2012".

At the outset, we would want to reiterate that the telecom market in India has witnessed significant transformation as technology has advanced from 2G to 3G, then to 4G, and now to 5G. Each technological leap highlights the telcos' ability to align their product offerings with market trends and consumer needs.

- 1) **One of the stakeholders has stated that current tariff plans offered by telecom service providers does not align with the preferences and usage patterns of elderly consumers.**

COAI Counter Comments

- a. We strongly believe that TSPs offer a wide range of tariff plans and vouchers tailored to market and customer needs, ensuring that all users find suitable and affordable options as per their preference.
- b. These tariff plans are well aligned with the usage patterns which includes flexible validity periods, ranging from single-day options to year-long subscriptions (1 to 365 days) and customizable data allocations, accommodating both high-volume users with up to 3 GB daily allowances and light users with as little as 0.06 GB per day. The fact that there has been a significant jump in both data as well as voice MoUs over last 5-7 years with consumers using more and more telecom services sufficiently proves that the plans on offer have been able to satisfy the differential needs of varied customer segments.
- c. Moreover, with the advent of digital payments, especially UPI, and extensive adoption of social media, many elderly customers opt for plans bundled with data component.
- d. Hence, we see no compelling reason to alter the current tariff plans provided by TSPs by way of any regulatory intervention. Given the comprehensive nature of these plans and their alignment with market demands, we believe that they adequately meet customer requirements and provide value without necessitating any changes.

- 2) **One of the stakeholders has stated that there is still a need for a separate voice & SMS pack.**

COAI Counter comments

- a. We strongly believe that the existing tariff packs offers by TSPs are well aligned with evolving market trends and customer needs and hence no specific intervention is required in this regard, and any such aspect should be left to market forces.
- b. The stakeholders must acknowledge that insisting on promoting voice-only tariffs as the sole way to meet customer demand for voice services is misguided. In-fact and on the



contrary, the significant jump in both data, as well as voice MoUs in last 5-10 years have proved that the plans on offer have not only satisfied differential needs of marginal customers but also encouraged more usage of the all the services.

- c. We also submit that since the Telecom liberalisation in India, the regulator or the government has never intervened with service specific mandates. It has maintained the principles of technology as well as service neutrality in retail market. Even under the TCPR or previous set of tariff regulations, there was never a moment when it was required by regulation to have a voice only or SMS only or data only plans. The market has been allowed to compete and evolve. The same should continue.
- d. The stakeholders must also recognise the capabilities of evolved modern networks that allow service providers to offer a mix of services in single plan. Earlier, the network capabilities were not such, and market had one service domination i.e. only typical voice. Today a customer can use a plan/product for any service, whether voice (given in abundance) or data or SMS.
- e. According to the findings of the report titled “Consumer Survey on Tariffs of Telecommunication Services and Related Issues,” a significant majority of customers—93 percent—report varying levels of satisfaction, from partial to full, with the range of tariff options available. Furthermore, an overwhelming 91 percent of customers consider telecom tariff plans to be affordable, with perceptions ranging from somewhat affordable to very affordable.
- f. It is important to recognize that data has become an essential component of everyday life for the average person, influencing communication, work, learning, and entertainment. With the advent of 5G technology and advancements in technology, data is crucial for providing consumers with advanced services such as telemedicine, financial inclusion, digital connectivity, and online remote education. With the advent of smartphones and plans that provide unlimited voice as well as data, customers are increasingly using data services, and accordingly, the telecom operators in India have aligned their plans (offering bundled plans) with customer need and demand only, that now include both voice and data services. These plans provide a comprehensive package that caters to the diverse needs of consumers. It is also to be noted that India not only has a young and tech-savvy population that is more inclined towards digital communication and content consumption, but also the average Indian consumer across age groups is very much alive to such technological services, changes and upgrades.
- g. It is also pertinent to note that the Government and that Authority have been making all possible efforts for digital inclusion of all citizens. In this context any intervention that will lead to tariffs without data services may become self-defeating. The availability of at least a small quantity of data is required to keep the window of opportunity open for a customer to connect with Digital Economy and such plans are already provided by the TSPs.
- h. In the context of SMS-only packs, the rise of communication apps such as WhatsApp, Facebook messenger, Telegram etc have led to a significant decline in SMS usage over recent years. Industry estimates suggest that over 90% of customers send one or fewer SMS messages per day. Consequently, we believe that SMS-only packs are unlikely to provide any meaningful benefit to customers.



- i. Therefore, we do not recommend introducing Voice and SMS-only packs, as the current plans already meet consumer expectations effectively and efficiently, which is also evident from the recently concluded consumer survey of TRAI.
