

Re: Consultation Paper on "Tariff Issues of Telecom Services" issued on 17th December 2019: Soliciting your valuable comments on the questions raised in the Consultation Paper

From : nchsebpl@gmail.com

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Subject : Re: Consultation Paper on "Tariff Issues of Telecom Services" issued on 17th December 2019: Soliciting your valuable comments on the questions raised in the Consultation Paper

To : Amit Sharma
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Comments on Consultation Paper on Tariff Issues of Telecom services by NCHSE (CAG) of Bhopal.

Before writing comments on Tariff Issues we must have a look with the past history of Telecom Sector. Before Reliance Jio enter in this field during 2016-17, there were number of TSPs giving their services and were cut throat competition amongst TSPs and thereby the tariff was reduced to a great extent resulted the consumer benefited. But on the other side TSPs did not take care about the development of infrastructure. This resulted various problems to consumer like call drop, connectivity, internet problem speed, VAS, no transparency in tariff, etc. The MNP was introduced and to some extent, there was a hint to TSPs to improve their services.

With the Reliance Jio enter in this field and offering alternative packages to consumer at cheaper rate many TSPs had left the field either merging with someone or wind up their business. At present only 3 TSPs, viz., Airtel, Vodafone-idea and Reliance Jio are exist in the private sector and BSNL (MTNL merged with BSNL) in public sector giving services to telecom consumers. The Reliance Jio had enter in this field with latest technology giving satisfactory services at cheap rate and sometime free packages resulted most of the consumers of other TSPs have taken over the services of Reliance Jio. All this resulted loss to Airtel and Vodafone Idea and many a time they reported that their AGR / ARPU have gone down to a great extent, resulted in loss to company. So with the present scenario in the telecom sector, we must take a note of it before taking any decision on Tariff issues.

The comments on the issues raised on Tariff are as given below:_

Q.1 There is a hike in tariff by the TSPs in December, 2019 and we hope their financial position will definitely improve. Apart from this, the tariff in India is still lowest. So we are of the opinion that intervention in tariff fixation should be deferred by a year or so.

Q.2 No

Q.3 Answer not required.

Q.4 There is still need to fix floor price in respect of video call, what apps, voice calls along with data. Very recently Reliance Jio has offered free voice and video calling to consumers. This definitely will reflect the adverse affect on other TSPs and since these services are being mostly used by the telecom consumer so need to fix floor price on such services which are free at present and used mostly.

Q.5 (a) The floor prices should be fixed in stages. At present an attempt should be made to fix floor prices on usage of &

(b) data, video and voice calling as these are mostly used by the consumers. So far the methodology of fixing floor prices is concerned, it should be the mean average of all the TSPs in the market including BSNL. Year 2019 can be taken into consideration for base.

Q.6 we don't think that by fixing floor prices some of the TSPs would be benefitted much more as compared to others.

Q.7 The floor prices for mobile data services should apply uniformly to all. If more specific in this context than postpaid and prepaid should have different floor prices.

Q.8 Mean average would be the best to have a basis. This has been explained in Q. 5 (a) & (b) .

Q.9 Please see the comments on Question 8.

Q.10 Yes, as it is being mostly used not only be corporate body but by individual also.

Q.11 Mean average separately for 2G, 3G & 4G services and a year 2019 should be the base.

Q.12 There should be some limit on TSPs to offer free off net calls. It should be maximum of 15 days or so.

Q.13 No comments.

Q.14 The floor prices should be considered only on such calls which has been explained in 5 (a) & (b)

Q.15 In the present situation where Airtel and Vodafone Idea are facing financial crises we don't think to have price ceiling. If they charge higher, the consumer has an option to shift to another TSP.

Q.16 No comments.

Q.17 Only the limited tariff plans as explained in Q. 5 (a) & (b).

Q.18 Feedback from the consumers of different categories and also by on independent body.

Q.19 Fixing of floor prices is a delicate issue and, therefore, an attempt should be made to take a decision after due consideration both on the part of TSPs those are facing financial crises and consumers at large. In this connection, the limit of MNP of 90 days can be modified.

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