

From:- Nitin Saorik, Amravati
To,
Mr Kaushal Kishore
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Sub: – Consultation Paper on Amendment of TRAI (Telecom Regulatory Authority of India) ruling of sending printed bills to its consumers. – Regarding.

Respected Sir

Digital billing must be made the default option. Printed bills should be chargeable as they have a direct environmental cost. Time to go green and adopt digital practices

1. As per the extant provision of TTO (46th Amendment), provision of hard copy of the bill or printed copy of the bill to postpaid subscribers is mandated as a default option. Is there a need to change the extant default option, i.e., provision of paper bill without any charge to postpaid subscribers of Wire line and (ii) Mobile services? Kindly support your answer with rationale.

Reply: Para 13 of Telecommunication Tariff (Forty Sixth Amendment) Order, 2008 dated 24th January, 2008 makes it mandatory for all Access Service Providers to provide hard copy of bills to its post-paid subscribers free of cost. This regulation was enacted when our overall tele-density was at 28%. However, after 10 years, the tele density stands at 90% with Urban tele density at 163% and Rural tele density at 56%. Charges should be levied to postpaid customers for provision of paper bill because Four Hundred Crore trees are cut down worldwide each year for paper, representing about 35% of all harvested trees. One tree makes around 8000 sheets of paper. On an average around Eighty Thousand Trees are cut per year just to generate printed bills for BSNL customers alone. But at the same time It is always difficult to bring in change in the age old habits of people. Therefore, in order to reap the benefits of the sweeping changes in the Telecom field, special initiatives are required to encourage people to embrace the new alternatives. An amendment in the above regulation will definitely go a long way in bringing about this change.

1. As against the existing practice of issue of printed bill to postpaid subscribers of (i) Wireline and (ii) Mobile service, unless a subscriber opts for electronic-bill (e-bill), should e-bill now be made the default option? And if so, why?

Reply: E-bill has to be made default option because Four Billion Trees are cut down worldwide each year for paper, representing about 35% of all harvested Trees. One Tree makes around 8000 sheets of paper. On an Average it is observed that around Eighty

Thousand Trees are cut per year just to generate printed bills for BSNL customers alone. So a switch over to e-bill has numerous benefits – saving the environment, reduction in generation of paper waste, reduction in the cost of paper/printing etc. The customer can easily get an SMS with a link to facilitate payments or he/she can go to the nearest service centre to make payments.

1. If e-bill is made default option then how the bills would be made available to Postpaid subscribers of (i) Wireline and (ii) Mobile services with (a). Subscribers of Feature phones and (b). Subscribers who do not have e-mail facility.

Reply: In today's scenario about 90% of India's population is connected with Mobile. So taking this into account and also with the overwhelming positive response, for our Hon'ble PM's Digital India Mission and adaptation of the same by the people of India, we can further save paper by sending these monthly bills via SMS or any other official digital mode available for promoting paperless working because it is observed that around Eighty Thousand Trees are cut per year just to generate printed bills for BSNL customers alone, which is a sheer degradation of our environment. Since everybody is having mobile, a SMS can be sent (i) with a link for payment and (ii) regarding amount to be paid. The customer can then simply pay his bill as HE paid it previously.

1. If a subscriber opts for e-bill and requests for change the option to printed bills, will there be a charge for providing the printed bill? Kindly provide reasons for your answer.

Reply: It should be mandatory that each Telecom Provider has to send bills by email/SMS/Digital media only because it will help in reducing generation of paper waste and e-waste and it will help in conservation of nature and perseverance of its natural resources.. But any customer desiring for printed bills would have to request for the same in writing. At the same time to discourage printed bills, such customers should pay a nominal fee. This will at least be a start and the above will help in saving the environment along with expenditure cost to the Government of India. Also only those genuinely desiring the printed bills would pay. It would be a responsible step as people should realize that '**ACTIONS**' have consequences.

1. What could be the safeguards for subscribers who do not wish electronic bills and prefer to get printed bills?

Reply: Any customer desiring for printed bills will have to request for the same in writing by paying a nominal fee, which will indirectly safeguard our environment by reduction in generation of paper waste, reduction in the cost of paper/printing etc .

1. TRAI has mandated specified set of information to be printed on bills to postpaid subscribers. If the printed bill is not issued, then how the specified set of information will be conveyed to subscribers? Should the same be mandated for e-bills also? Kindly support your comments with justification.

Reply: If the printed bill is not issued then the same set of information can be included in the bill which is sent via email, sms or any other digital mode so that more and more subscribers would be encouraged to switch over to e-bills. This will also support our Hon'ble Prime Minister's Digital Initiative and people will adopt Digital Media.

2. Any other issue relevant to the subject discussed in the consultation paper may be highlighted.

Reply: Apart from the initiatives taken for switching over from printed bill to e-bill it is equally important to provide broadband connectivity and universal phone connectivity. To fulfil this mission, there has to be revolutionary changes in Telecom field and so our Hon'ble Prime Minister has introduced The 'Digital India' program of the Government of India (GOI), which envisages that 250,000 Indian villages will enjoy broadband connectivity, and universal phone connectivity. BharatNet has already completed Phase-1 of the broadband project by connecting over 100,000 Gram Panchayats (GP) across the country, which is quite commendable.

Lastly I wish to appreciate the fact that TRAI has taken out this paper as a first step towards '**GREEN BILLING**'.

Hoping for early action in changing your regulation.

Regards

Nitin Saorik, Amravati