

Question 1: Whether TRAI should intervene in the issue of validity period or allow the same to be under forbearance?

I counter the COAI comment. The competition in India is non-existent and a cartel is functioning - data speeds contention ratio is abysmal leading to not even EDGE speeds of 384 kbps, hence the low tariffs are a joke as actual price per GB is much higher per transaction such as downloading a video

From the days of lifetime validity we have come to a position where subscribers are forced to pay for validity every 28 days despite the fact that the data they get can not be used as speed is too slow and the talktime they get is of no use as they get error messages everytime they call. Hence the era of forbearance is over in Indian tariffs.

Question 2: If the answer to the Question 1 is yes, then whether the TSPs be mandated or merely advised to offer tariff (for PVs, STVs and CVs) for a specified duration? 2

. THE COAI comment is a function of their pricing cartel and is laughable.

The tariff duration for validity recharge should be minimum 6 months as in GCC countries like the UAE where validity is 6 months for any topup

Question 3: Whether the period to be specified should be considered as 30 days or a month with requirement of tariff to be renewed only on the same date of each month or separate tariff offers be mandated for 29/30/31 days in addition to the present practice of offering tariff for 28 days?

I disagree with COAI as consumers are not aware of 28 days which is an odd figure. More over operators send reminders 10 days before the validity expires and the subscriber is fooled to recharge for 28 days, hence his effective validity goes down to 18 days. This is as admitted by COAI in pt. 9. They do not however reveal that subscribers are bombarded with recharge SMS affecting their battery charge and that if they recharge in advance they lose out.. for example if they recharge 7 days in advance they get 28 days and they lose on the 7 days which they have remaining

This practise of 28 days recharge and repeated reminders by SMS before expiry should be banned by TRAI and reminder should only come the day of expiry

The period should not be 30 days but at least 180 days for the minimum value which should not be more than a nominal amount. In The UAE, even a 3 AED recharge is valid for 6 months

Also COAI is telling lies in point 10. Subscribers can not usually check their status on the website but are forced to download the poorly designed apps of mobile operators.

The apps have very poor UI/UX and require to be updated every few days consuming data. The apps also consume a lot of space in the mobile.

TRAI should also make it mandatory for operators to have both website and apps available to see usage and do self care. Also apps updates should be restricted .

Question 4: Whether on the lines of a monthly offering, the other periods viz., quarterly, half-yearly and yearly prepaid tariff offerings be mandated or just the monthly offerings be required?

While I agree with COAI that these offerings are there in the market, the prices are prohibitive and a ceiling should be kept on prices by TRAI

Question 5: If there are any other issues/suggestions relevant to the subject, stakeholders are invited to submit the same with proper explanation and justification.

I disagree with all the COAI comments. The poor financial structure of the industry is due to mismanagement, hiring of foreign expatriates at expense of experienced Indians, following age discrimination and other issues.

TRAI should set a ceiling price for validity recharge vouchers including a special low priced plan for those who want to use mobile only for receiving OTPs and who make very few calls a month and rarely use data. Earlier when we had competition, lifetime recharge vouchers were existing but now a pricing cartel has taken over the industry and needs to be busted by TRAI

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