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Comments/Counter comments on TRAI's Consultation Paper on "Review of extant provision for sending the printed bills to consumers of landline and post-paid mobile subscribers"

Environmental concerns certainly call for a shift from paper bills to e- bills. However, that has to happen gradually, taking into account the ground realities in India. For a seamless transition from paper bills to digital bills, the telecom subscribers should have the wherewithal –in this case, access to internet/e-mail or smart phone and e-literacy . Unfortunately, a large section of the subscribers, particularly rural consumers and senior citizens, still do not have these resources/facilities/capabilities.

Today, almost everyone has a cell phone – the subscriber base of over one billion is an indicator. But everyone does not have a smart phone or an internet connection and that is where the problem arises visi-a-vis digital bills. As per the TRAI consultation paper (quoting a survey conducted from February 16 to May 8, 2017 by Pew Research Centre), only one in four Indians reported using the internet or owning a smart phone.

There is also a large number of senior citizens (10.4 crores as per the 2011 census data) and rural consumers who are not internet savvy and therefore cannot handle /comprehend e-bills. Many of them keep a file of their bills and would certainly like hard copies of the bills. In fact many consumers who get e-bills today say that they take a printout for tax purposes or for maintaining a file-so that defeats the very purpose of sending a digital bill.

Given these circumstances, any move to forcibly shift to e-bills will render these sections highly vulnerable. They will be inundated with text messages on the bill

due date and the total amount to be paid and with the threat of disconnection hanging over their heads , many of them-particularly senior citizens- - will be forced to pay without verifying the detailed bill. In other words, the e-bill will deny them their right to full information about the bill and they may never detect exaggerated or incorrect billing as a result.

Consumers have a right to information and right to grievance redress. Any amendment to the Telecom Tariff Order, making e-bill the default option at this stage will deny landline and postpaid mobile service subscribers these rights because (a)those who do not have smart phones or e-mail or internet access will not get to see the detailed bill and (b) in the absence of such information, they will not be able to detect and therefore resolve overcharging/erroneous billing issues.

Today, many subscribers who are getting e-bills from service providers say that their consent was never taken for it. The service provider just started sending them the digital bill and thanked them for choosing the option. In this scenario, will the vulnerable sections of subscribers, whose meager resources do not permit them to have access to the internet or a smart phone, be able to demand and get hard copies of the bill for free? Will the TRAI be able to protect this large section of subscribers and ensure that each of those who opted for paper bill gets it?

TRAI, as the regulator, has the mandate to protect the interests of all classes of consumers/telecom subscribers, particularly the vulnerable sections and amending the Telecom Tariff Order to make e-bill the default option would violate this mandate.

Instead, telecom service providers can get all those subscribers who have access to an internet / smart phone to voluntarily opt for e-bills. They can advertise, offer incentives and make genuine efforts to persuade subscribers to choose digital bills. Such a move would ensure a smooth switch from paper to digital bills, as and when subscribers are ready for them.