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भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

To,

Advisor (F&EA),
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg, New Delhi

No. Regln/1-10/2012/2689

Dated: 31-12-2015

{Kind attention: Sh. Vinod Kotwal }

SUB: - TRAI's Consultation Paper on "differential pricing for data services"

Kindly refer to the TRAI press release no.70/2015 dated 09-12-2015 vide which TRAI has released Consultation Paper on "differential pricing for data services" dated 09-12-2015. In this context, Question wise BSNL's comments are as follows.

Question 1: Should the TSPs be allowed to have differential pricing for data usage for accessing different websites, applications or platforms?

Ans: Yes, TSPs be allowed to have differential pricing for data usage for accessing different websites, applications or platforms. Prices are always used as a means of product/ service differentiation as same is normal business practice across the various industries. Allowing the TSPs to provide different pricing for few appealing services will help in increasing the data adoption in the country. The existing regulation framework if required may be suitably amended to facilitate above.

Differential pricing is a move towards building a transparent relation between customers & service provider. With differential pricing, TSPs can accurately predict what a customer's wants & can offer as per their needs/ requirement.

However, in order to have a uniform end user experience among all customers of all TSPs, it is required that such differential charging especially free or near zero charging cases should be provided by all TSPs simultaneously. As such any free offer being provided by a third party should be open for all TSPs on same terms and conditions.

Question 2: If differential pricing for data usage is permitted, what measures should be adopted to ensure that the principles of nondiscrimination, transparency, affordable internet access, competition and market entry and innovation are addressed?

Ans: Differential pricing is a practice of charging customers different prices for the same service. General idea behind differential pricing is to set prices based on demand or what

customers are willing to pay. With this, discount/ offer may be given to different demographic groups, as with discounts for senior citizens, students, institutions etc. Differential pricing model is purely transparent, affordable, and competitive as the subscribers are getting data packages as per their need. It is also beneficial for TSP point of view as it is for the both segments price sensitive customers & for those who willing to pay more.

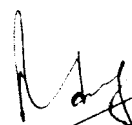
Question 3: Are there alternative methods/technologies/business models, other than differentiated tariff plans, available to achieve the objective of providing free internet access to the consumers? If yes, please suggest/describe these methods/technologies/business models. Also, describe the potential benefits and disadvantages associated with such methods/technologies/business models?


Ans: There could be some methodologies/ business models, but it could not be as effective as differential pricing.

Question-4: Is there any other issue that should be considered in the present consultation on differential pricing for data services?

Ans: No comments.

This is for your kind consideration please.


for (Raghuvir Singh)
AGM (RegIn-II)
31-12-2015


I agree
15/12