

Feedback in personal capacity from: Malek Ali

Comments are from the perspective of a consumer of mobile and fixed line services.

1. CPP v MPP for voice

CPP is long overdue. For a consumer point of view, the fundamental criteria is "control". Under an MPP system, I have no control over my own mobile costs because this is dependent on third parties, some unknown. (Even if callers are known parties, why should I pay for someone to gas away at me?)

The weaknesses of the current MPP system is masked by the innovative packaging done by mobile operators, who package a certain number of minutes for both incoming and outgoing mobile calls. However, this is at the expense of transparency, and until today, I can never verify whether I truly used up my 120 minutes or whatever per month. An unsatisfying situation.

There is also inefficiency in the system and a transfer of value to fixed line operators. Example: I have called so many people on their mobile from a fixed line phone, and they say to me, "Can you call me again on my fixed line phone, I'm at the office now." Potentially several attempts later, sometimes through office phone automation systems, I finally get hold of the person I was calling before, but I have lost a few minutes in the process.

If the call is important enough to the caller to call the mobile number of the intended recipient, the caller should also be prepared to pay for it. Again, this is an issue of control, the control to influence my calling priorities.

Moving to CPP would however mean fixed line operators paying a termination fee to mobile operators. I think this can be worked out so that termination fees are at a level where the impact on mobile operators are duly compensated for loss of receiving call revenues.

I can't figure out the technicalities of how Starhub does their free incoming calls, but hey, I'm a loyal Starhub customer because of that.

2. CPP or MPP for data.

I suspect that you'd probably not want to regulate as yet as to what mode of charging services will dominate - the fact of the matter is that no one knows what business model works.

But the principle should be "control to the mobile consumer". For example, everything should be permission based. If I request for pull data, I should be charged for it. If I asked for push data, I should be charged for it. If I wanted to send a video pic to a friend, I should be charged for it. Whether it is by bytes or by subscription or by whatever, follow the Isle of Man experiments, let the particular service provider decide based on his best commercial judgment. IDA should not decide for him.

Contrast this with other data which I don't request, e.g. m-coupons as I visit come to the proximity of a retail store - this should be charged to the retailer - hey I didn't ask for it, so why should I pay for it (unless I have given consented to my network operator to pay for an m-coupon service).

I suspect that the market will settle down to a point where the consumer

will be charged a general subscription fee for an always-on data capability, (which can be packaged with a certain amount of data transfers) but anything beyond this will require the consent of the consumer to be charged.

3. Impact of CPP or MPP for data on growth of data segment

Highest growth will happen if control is in the hands of the consumer and charges are transparent to her. There's nothing worse than uncertainty or ambiguity to delay a purchase of a product/service (if you want to see a classic example of this, note the "lack of visibility" cited as a reason for delaying corporate technology purchases in the US, precipitating a recession there). If you allow the data equivalent of the current MPP regime for voice where you're uncertain about your costs, you will stifle the penetration of 2.5 and 3G. For an uncertain technology, please don't add any more hurdles on adoption.

4. Actions to stop spamming under MPP regime

This I believe you need to come down hard on, even to the point of regulation if necessary (e.g. set up equivalent of Advertising Standards Authority of UK where companies can be publicly censured and possibly fined for spamming mobile consumers - negative publicity in the media is sufficient deterrent. Personal communication devices are exactly that, they're personal. For some, it's used only for urgent matters and getting spam on them is really an invasion of privacy. I've been getting spam on my mobile for chatlines and I'm fuming... Not too sure whether the network operator or some other person is responsible, but I ain't pleased.

5. Comments on FMI framework

Hard to get my teeth into this as a consumer, but I'm sure the network operators will have a field day here.

Regards,
Malek Ali