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# Challenging the Competition Precedent: A Critical Analysis of the Competition Commission Decision on Bharti Airtel Ltd. vs. Reliance Industries Ltd. & Anr.

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## ABSTRACT

*Through this article the authors wish to critically challenge the precedent set by the Competition Commission of India in the case of Bharti Airtel Ltd. v. Reliance Industries Ltd. & Anr. The Competition Commission of India was established under The Competition Act, 2002. The main aim of this Act is to prevent practices which have an adverse effect on competition and to promote and sustain competition in the market. The authors have critically analyzed the order of The Competition Commission of India in the purview of the objective of The Competition Act, 2002, the principles of fair trade and the constitutional values that empower such principles. This article deals with two of the most important issues that ensure fair competition in the market, anti-competitive agreements and abuse of dominance.*

*This article entails a detailed criticism of the three basic contentions of the Informant i.e. Bharti Airtel and factually differs from the reasoning given by The Competition Commission of India. Further this article portrays the effects of this order and how it has helped change India. This article also depicts the negative impact of the order on the other pre-existing wireless telecom service providers. The authors have further traced the development of Reliance Jio, post the order of The Competition Commission of India and related it to highlight how the Reliance Jio's latest venture Jio Fiber has eased the existing pandemic situation.*

**Keywords:** *Competition Commission of India, Reliance Jio, Bharti Airtel, Predatory Pricing, Abuse of dominance.*

## I. INTRODUCTION

*“An Act to provide, keeping in view of the economic development of the country, for the establishment of a Commission to prevent practices having adverse effect on competition, to*

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*promote and sustain competition in markets, to protect the interests of consumers and to ensure freedom of trade carried on by other participants in markets, in India, and for matters connected therewith or incidental thereto.”<sup>3</sup>*

The Competition Act, 2002 was enacted for the establishment of a Competition Commission of India (CCI) to prevent practices having adverse effect on competition, to promote and sustain competition in markets, to protect the interests of consumers and to ensure freedom of trade. An Act that derives its root from the Constitution, that ensure a competitive environment and focuses to create a capitalistic market where welfare of the people is the prime motive and consumer protection is the basic aim. The Preamble of the Constitution of India ensures that the Constitution guarantees Economic Justice. Thus, the Act, 2002 is a legislation that was drafted to provide a freedom of trade and less restrictive trade practices, to help new businesses flourish in the Indian Market.

The Competition Act, 2002 aims to keep a check on foul trade practices that have appreciable adverse effect majorly through section 3 i.e. Anti-Competitive Agreements and Section 4 i.e. Abuse of Dominant Position. The focus of this Article is to highlight to readers about the misuse of powers by the Competition Commission of India, specifically pointing out their restricted interpretation of the parent statute which they derive their authority from and further creating a loophole for industries to use unfair practices in the name of competition to capture the market. This article aims to portray the fallibility of the Commission and its decision in the case of *Bharti Airtel Limited vs. Reliance Industries Limited and Anr.*<sup>4</sup>The decision is based on the interpretation of section 3 and 4 in context of the facts. The Commission has paved the way for new entrants to use unfair means to make a place in the market.

The Competition Act, 2002 strictly prevents any such agreement between an enterprise or person or association of any of two in respect of production, supply, distribution, storage, acquisition or control of goods or provision of services, which causes or is likely to cause an appreciable adverse effect on competition within India.<sup>5</sup> Therefore, if any entity of the market tries to control the market through an agreement that may adversely affect both the competitors and the consumers would be termed to be an anti-competitive agreement. Further, under section 4 of the Act, it restricts the misuse or abuse of dominant position. Dominance refers to a position of strength which enables an enterprise to operate

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<sup>3</sup> The Competition Act, 2002, Preamble, No. 12, Acts of Parliament, 2003 (India).

<sup>4</sup>Bharti Airtel Limited vs. Reliance Industries Limited and Anr., Case No. 3 of 2017, Competition Commission of India.

<sup>5</sup>The Competition Act, 2002, § 3, No. 12, Acts of Parliament, 2003 (India).

independently of competitive forces or to affect its competitors or consumers or the market in its favour.<sup>6</sup> Therefore, abuse of dominance would impede as a competition among dominant enterprises that may control the prices and limit the market with unfair conditions of trade to eliminate competition and create a monopoly for themselves by capturing the market. If one enterprise uses its strength from one market to enter into another market may also amount to abuse of dominance. This may result is defeating the competitive spirit that the Act aims to develop as well as to protect the consumer's right to choose. The Dominant Player of the market may control the pricing of the commodity using its own financial strength, known as predatory pricing. "Predatory Price" means the sale of goods or provision of services, at a price which is below the cost, as may be determined by regulations, of production of the goods or provision of services, with a view to reduce competition or eliminate the competitors.<sup>7</sup>

In September, 2016 Reliance Industries announced their entry into the wireless telecom and internet services market through their subsidiary Reliance Jio. Reliance Jio announce high speed 4G internet free for three months as a Welcome Offer to enter into a market of an already established competition. It further extended the offer by three more months. This time period built a huge subscriber base for Reliance Jio and eliminated some competitors from the market and the rest suffering huge loss. The Constitution does guarantee freedom of trade and profession along with economic justice, but not at the expense of other. A man's right ends where other's nose begins, and thus, a victim of Reliance Jio's free services for six months, its prime competitor, Bharti Airtel informed the Competition Commission of India alleging Abuse of Dominance, Predatory Pricing and Anti-Competitive Agreement between Reliance Industries and its subsidiary Reliance Jio. Further this article would also highlight the effects of the decision made by the Commission and draw the inference of its impact in the present time of COVID-19.

## **II. RELIANCE JIO'S INCEPTION AND HOW RELIANCE INDUSTRIES LIMITED ACQUIRED JIO.**

Reliance Industries Limited (RIL) is stated to be one of the biggest private companies in India in terms of size, revenue, assets and value, leading it to be one of the financially strongest companies in the country. It is also India's first private sector company to feature in

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<sup>6</sup>Frequently Asked Question Booklet, Advocacy Series on Competition Act, 2002, Competition Commission of India.

<sup>7</sup>The Competition Act, 2002, § 4, No. 12, Acts of Parliament, 2003 (India).

the Fortune Global 500 list of ‘World’s Largest Corporations’<sup>8</sup>. It is engaged in various sectors including exploration and production of oil and gas; petroleum refining and marketing, etc, and has now taken over the telecom sector.

Originally, in June 2010, Reliance Jio was known as Infotel Broadband Services Private Limited (IBSL), when Reliance Industries bought 96% stake in Infotel in the Broadband Wireless Auction (BWA), where IBSL had won the auction in 2300 MHz band category on pan India basis. Infotel initiated the operations as a telecom subsidiary of Reliance. Later in January 2013, it was renamed as Reliance Jio Infocomm Limited (RJIL). At present, RIL is stated to hold 99.44% stake in RJIL.

When Reliance Jio’s services were started, it had clear intentions to take over the telecom sector as it had already made its mark in all the other sectors of the market. While addressing the nation for the services provided by Reliance Jio, Mukesh Ambani made statements such as “Jio is one of the largest transformational digital initiatives anywhere in the world with an initial investment of more than ₹ 150,000 crore. It really is the world’s biggest start-up.” or “We are ready to launch (4G services) and in the second half of 2016, 80% of India’s population will have high-speed mobile broadband Internet. So, 80% of India’s 1.3 billion Indians will have high-speed mobile Internet,”<sup>9</sup> which proves that he had clear intentions of creating monopoly in the telecom sector and coming up with such plans of free calling and providing data at cheaper prices adds up to it.

In 2016, during its launch, Reliance Jio came up with various innovative welcome offers (free and unlimited offers) for the subscribers. Later on, they offered ‘unlimited voice calling’ and 10 data plans which were way cheaper than any other telecom service provider. By the time Reliance Jio launched its first paid plan in July 2017 at the 40<sup>th</sup> Annual general Meeting in Mumbai, it had already accumulated 108 million users and had become the world’s fastest growing telecom network. India, at present, continues to have the cheapest mobile data in the world because of Reliance Jio and it is India’s largest telecom with 388 million subscribers.<sup>10</sup>

The problems and losses faced by other telecom service providers are not hidden from the world. Even the number one telecom service provider Bharti Airtel faced problems to survive in the market as its profits fell by 93%. In order to face Reliance Jio in the market and

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<sup>8</sup> Reliance Industries Limited Official Website, <https://www.ril.com/OurCompany/About.aspx>.

<sup>9</sup> **Vidhi Choudhary**, *Reliance Jio initial investment at Rs150,000 crore: Mukesh Ambani*, LIVEMINT (Mar 31, 2016), <https://www.livemint.com/Companies/ncT04NLRTtEMDEHAWdMPGN/Reliance-Jio-initial-investment-at-Rs150000-crore-Mukesh-A.html>.

<sup>10</sup> **Sohini Mitter**, *Inside Jio’s billion-dollar deals: Why investors are flocking to Mukesh Ambani’s \$65B internet biz*, YOURSTORY (May 28, 2020), <https://yourstory.com/2020/05/jio-billion-dollar-deals-investors-mukesh-ambani-internet-biz>.

survive, these companies had to revise their old plans and prices. Bharti Airtel as well as Vodafone started to offer free data for a limited time period and revised the prices of the plans, which incurred them huge losses.

### **III. A CRITICAL ANALYSIS OF THE COMPETITION COMMISSION OF INDIA DECISION**

The Informants (here Bharti Airtel) alleges three basic contentions as follows: -

1. Reliance Industries were using their financial strength to enter into the telecom market through Reliance Jio, alleging the abuse of Dominant Position by Reliance Industries, in contravention to section 4(2)(e) of the Competition Act, 2002.
2. Further, the free services provided by Reliance Jio were in contravention to section 4(2)(a)(ii) of the Competition Act, 2002 and amounted to predatory pricing.
3. Lastly, alleging an anti-competitive agreement between Reliance Industries and Reliance Jio in contravention of Section 3 (1) of the Act, 2002 whereby Reliance Jio had unfettered access to the funds and resources of Reliance Industries to cause an appreciable adverse effect on competition in the telecom industry.

The Competition Commission of India started the proceeding with a preliminary conference with both the parties and then further went on to examine each allegation in relation to the facts as provided by Bharti Airtel and Reliance Jio. The examination of allegations is as follows:

A. The Competition Commission has limitedly interpreted the term ‘relevant market’ in context of the present matter. The Commission has sufficed the “wireless telecom services” to be the relevant geographical market, and focused on dominance of Reliance Jio in its individuality. Whereas, the Informant, i.e. Bharti Airtel aimed to allege the dominance of Reliance Industries in the Indian market as a whole, and using that dominance and strength to enter the telecom industry. Jio’s virtual network/spectrum sharing tie-ups with Anil Ambani-led RCOM, and both operators’ 4G spectrum holding were the reasons cited by Airtel for Jio’s “dominant position”. RCOM holds 1107.8 MHz of 4G LTE spectrum, while Jio holds a dominant share of spectrum in all 4G bands including 2300MHz (50% share), 800MHz (56%), and 1800MHz (28%), according to the complaint. Jio has 2.43 lakh base station, which is 18% of the total base station installed by the industry and 66% of overall 4G LTE base stations. Jio also has over 72 million 4G broadband users, which is the largest wireless

broadband user base in India.<sup>11</sup> Further, in the case of *MCX Stock Exchange v. National Stock Exchange of India Limited & Ors.*<sup>12</sup>, the Commission laid down that in order to achieve the recoupment requirement of a predatory pricing claim, a claimant must meet a two prong test: first, demonstration that the scheme could actually drive the competitor out of the market; second, there must be evidence that the surviving monopolist could then raise prices to consumers long enough to recoup his costs without drawing new entrants to the market.<sup>13</sup> Reliance Industries entered the market providing free telecom and internet services, driving out competitors and gathering subscriber base in the market including rural nooks and urban corners. They provided free telecom and internet services for a period of six months and yet sustained all losses even when they were required to pay interconnection charge of 14 paisa per minute for calls by its subscribers to customers of other network and still were able to make a position in the market to become the biggest wireless telecom and ISP in India in just three years of their inception. In the April of 2017, Reliance Jio announced its first paid package to its users to recoup the costs of the losses incurred over the six-month period of free services. The plans amounting Rs. 309 and Rs. 399 were announced providing 84 GB of data and unlimited calls on any network. By the end of April 2017, Jio had grown a subscriber base of 112 million in India.<sup>14</sup> This clearly indicates that the essentials of dominant position of the Opposite Parties in the relevant market are fulfilled.

B. The Competition Commission while dealing with the predatory pricing allegation termed it as contradictory on the part of the Informant. The submissions of the Informant impugned free services of Reliance Jio as being an outcome of leverage of dominant position by Reliance Industries. The Commission noted that the Informant had not given any plausible explanation as to how the impugned free services is an outcome of unilateral conduct of Reliance Industries as well as an anti-competitive agreement between Reliance Industries and Reliance Jio. The Commission in their observation notes that providing free services cannot by itself raise competition concerns unless the same is offered by a dominant enterprise and shown to be tainted with an anti-competitive objective of excluding competition/ competitors, which does not seem to be the case in the instant matter as the relevant market is

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<sup>11</sup> Salman SH, *Here's why CCI dismissed Airtel's complaint against Jio*, MEDIANAMA, (July 23<sup>rd</sup> 2017), <https://www.medianama.com/2017/06/223-heres-why-cci-dismissed-airtels-complaint-against-jio/>.

<sup>12</sup> *MCX Stock Exchange v. National Stock Exchange of India Limited & Ors.*, 2011 SCC OnLine CCI 52.

<sup>13</sup> Suryansh Singh, *The Predatory Pricing case against Reliance Jio: Did CCI Miss an Opportunity to Rejuvenate Indian Telecom Sector?*, CENTRE FOR COMPETITION LAW AND ECONOMICS, <https://www.icle.in/resource/the-predatory-pricing-case-against-reliance-jio-did-cci-miss-an-opportunity-to-rejuvenate-indian-telecom-sector/>.

<sup>14</sup> PTI, *Reliance Jio unveils new packs, reduces validity on ₹309 plan*, THE HINDU, (JULY 12, 2017 02:16 p.m.) [www.thehindu.com/business/Industry/Reliance-jio-unveils-new-offers-reduces-validity-on-309-plan/article19263202.ece](http://www.thehindu.com/business/Industry/Reliance-jio-unveils-new-offers-reduces-validity-on-309-plan/article19263202.ece).

characterised by the presence of entrenched players with sustained business presence and financial strength. The Commission has very confidently disregarded the facts and prima facie evidences against Reliance Industries and Reliance Jio. The Commission has failed to understand the contentions of the Informant and termed it contradictory. The Informants alleged that Reliance Jio being a subsidiary of Reliance Industries is the gateway of Reliance Industries to enter the telecom market, further the agreement of Reliance Jio with Reliance Industries controlled the telecom prices in the market as all other existent players had to reduce prices of their plans in order to stay and maintain business in market. The losses incurred by Reliance Jio were substantially recouped by the Reliance Industries. The Commission noted of free services to not be the only criteria of competition concerns unless backed by a dominant enterprise but has completely disregarded the fact that the position that the informant and other market players took eight to ten years to reach was the base of its inception. The Commission acknowledged the fact that both Bharti Airtel and Reliance Jio were equal in terms of technical infra-structure for the provision of services. The Reliance Industries acquired Infotel Broadband Services Private Limited that won the spectrum auction in 2010 and changed its name to Reliance Jio, and allowed unfettered access of its funds to Reliance Jio so as to cause and likely to continue to cause an appreciable adverse effect on competition within the relevant market. Therefore, Reliance Jio was in a position to dominate the market and incur the losses by providing free services as it can use the financial strength of Reliance Industries. This is not the first time that the Commission has ignored such vital facts while deciding matters on predatory pricing. In the case of *Fast Track Call Cab (P) Ltd. v. ANI Technologies (P) Ltd.* (2017)<sup>15</sup>, the Informant alleged that the conduct of predatory pricing was an evidence of dominance in itself and the Commission, in this regard observed that Ola did not have any existing dominant position in the market and stated that the new entrants commonly engage in such practices to gain a toehold in the market and holding them dominant based on simple observation of conduct may have the undesirable result of chilling competition. Therefore, we can say that the commission has been very consistent in terms of disregarding such essential factors when it comes to deciding matters pertaining to predatory pricing as a proof of dominance.

C. The Competition Commission focused on majorly on justifying that Reliance Jio was not in a dominant position as it was a new player and has arbitrarily disregarded the role of Reliance Industries in the dominant success of Reliance Jio in the telecom market. It is evident that in the present market, no company in its individuality can survive by providing

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<sup>15</sup> *Fast Track Call Cab (P) Ltd. v. ANI Technologies (P) Ltd.*, 2017 SCC Online CCI 36.



free services for an extensive period of six months in their course of business and having no other source of income to balance for its loss. Reliance Industries is a global industry and has subsidiaries in various markets. It has been ranked 96<sup>th</sup> in Fortune Global 500 list of world's biggest Corporates of 2020 with total assets worth \$160 Billion. Reliance Jio is a legal subsidiary of Reliance Industries, and carries business in the telecom industry on behalf of the latter. The Informant alleged that Reliance Industries and Reliance Jio have an anti-competitive agreement under section 3 (1) of the Competition Act, 2002 and that Reliance Jio is a leverage of dominant position of Reliance Industries. The Commission on this allegation held that Reliance Industries itself is not engaged in business of providing telecom services or any activities incidental thereto. If one were to construe such investment as anti-competitive, the same would deter entry and/or expansion and limit the growth of markets. In view of the above, no prima facie case of contravention of Section 3(1) or Section 4(2)(e) of the Act is made out against the Opposite Parties. The Commission here has ignored that the free service provided by the Reliance Jio has caused appreciable adverse effect on the competition by elimination competition rather than just making a place in the market as has been noted by the Commission. Even though the literal interpretation of section 3 may limit the entity of such agreement to be necessarily a player of the relevant market, but its aim is to eliminate any anti-competitive practice from the market which is the case here. A mere failure on the part of legislative should not take its toll from the players of the market. The restrictive interpretation of Competition Act, 2002 has created a base for new entrants into relevant markets to misuse their dominance and practice anti-competitive activities as well as abuse its dominance to make a place in the market.

The Preamble of the Constitution of India itself guarantees Justice- social, economic and political. The Art. 38 which is the basis of enactment of the Competition Act, 2002 which provides for Promotion of Welfare of the People serves as the basis of Economic Justice which has been defeated here. Even though, the DPSPs are non-justiciable, they serve as the basis of any law. The Preamble of the Competition Act, 2002 also ensures economic development of state through establishment of a Commission to prevent practices having adverse effect on competition. The Commission is setting an unconstitutional precedent by providing the new entrants to the market a chance eliminate competition and exploit the market. Reliance Jio has eliminated various players from the market with their financial strength and have steered their way to the top. This has created a platform for a monopolise capture of various markets by Reliance Industries. The Legislature is in a dire need to amend the Act, 2002 to accomplish the objective with which it was drafted.

#### IV. EFFECTS OF DECISION

The order passed by the Competition Commission of India has been a turning point both in the telecom industry and for digitalising India. Reliance Jio has become a USD 26 billion company being a subsidiary of Reliance Industries.<sup>16</sup> A recent report from The Caravan<sup>17</sup> argues how Reliance Jio's rock bottom data pricing offers have forced the competitors to slash their tariffs significantly to the extent of incurring heavy losses. Airtel had reported a net loss of 54 per cent in the year succeeding Reliance Jio's launch, a position which hasn't changed much even now. The result of this, the report claims, has been the rising levels of corporate debt that will be difficult to pay off. By March 2018, India's telecommunication companies had a cumulative debt of over \$75 billion out of which only \$27.6 billion was in revenue. Reliance Jio's entry has prompted a wave of mergers and combinations resulting in fewer market players and a subsequent collapse in competition.<sup>18</sup> In the year of 2015, when Reliance Jio started its business in the telecom industry, there were a total of nine private sector wireless telecom service providers operating in the country. But, at present there are namely just three that survived after Reliance Jio's entry namely- Bharti Airtel, Vodafone-Idea and Reliance Jio. Reliance Jio currently leads the subscriber base in India at around 370 million users in 2019.<sup>19</sup> Reliance Jio did not just make a place for themselves but somewhat monopolised the Telecom Industry, gifting India one of the cheapest access to Internet across the globe.

At the time of pandemic, when the world was locked in their homes and the global economy is in recession, the shift to online work (Work from Home) has become the biggest trend. Reliance Jio's latest venture of Jio Fibre (Optical fibre broadband service) that guarantees high speed data plans have helped us to keep working even in such tough times. The Government of India initiative of a Digital India took pace only after the entry of Reliance Jio. The credit for keeping India moving even at the time of Covid-19 pandemic, Reliance Jio and other ISPs have constantly ensured that India works and the economy does not collapse. Reliance Jio's cheap internet access has finally digitalised India to every nook and corner,

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<sup>16</sup>Reliance Jio Financial Statement 2019.

<sup>17</sup> Shailesh Andrade, *How government decisions are helping Reliance Jio monopolise the telecom sector*, THE CARAVAN, (Feb 01, 2019) [https://caravanmagazine.in/reportage/government-helping-reliance-jio-monopolise-telecom?fbclid=IwAR3V4riJW6Tn\\_TpyNopVtNC2IdlNNmOYo88DRU8RuzbB\\_P1wfGPbFdsRiSEopolise-telecom?fbclid=IwAR3V4riJW6Tn\\_TpyNopVtNC2IdlNNmOYo88DRU8RuzbB\\_P1wfGPbFdsRiSE](https://caravanmagazine.in/reportage/government-helping-reliance-jio-monopolise-telecom?fbclid=IwAR3V4riJW6Tn_TpyNopVtNC2IdlNNmOYo88DRU8RuzbB_P1wfGPbFdsRiSEopolise-telecom?fbclid=IwAR3V4riJW6Tn_TpyNopVtNC2IdlNNmOYo88DRU8RuzbB_P1wfGPbFdsRiSE)

<sup>18</sup>Suryansh Singh, *The Predatory Pricing case against Reliance Jio: Did CCI Miss an Opportunity to Rejuvenate Indian Telecom Sector?*, CENTRE FOR COMPETITION LAW AND ECONOMICS, <https://www.icle.in/resource/the-predatory-pricing-case-against-reliance-jio-did-cci-miss-an-opportunity-to-rejuvenate-indian-telecom-sector/>

<sup>19</sup> *Number of Telecom Subscribers in India as of December 2019*, STATISTA, (February 2020), <https://www.statista.com/statistics/258794/mobile-telecom-subscribers-in-india-by-company/>.

today, even the rural are well connected and running with the pace of the world. Right to Internet has become possible in India after Reliance Jio's entry.

## **V. CONCLUSION**

When we talk about the Competition Act of 2002, we see that the Act aims at preventing practices which have adverse effect on competition and to promote and sustain competition in the market. The Act focuses to make a capitalistic market rather than creating a monopolistic one. But from the above discussed cases especially the case of Reliance Jio and the Ola case, we can very evidently say that the CCI has always decided matter by interpreting the provisions of the Act in its literal sense which makes it very restrictive. According to the Commission, a new player using unfair means in order to enter the market is not wrong and is not against the Act. The question that what if because of these unfair practices the existing players are incurring losses and the new player is creating a monopoly in the market still remains unanswered by the Commission. The decision to let the new players continue in the market even after their dominance is proven and to let it control the market according to its whims and wishes very clearly shows the inefficiency on the part of the Commission and how it sets a wrong and biased precedent for the future cases. The LPG policy of 1991 aimed for the growth of the Indian economy and it was soon realised that the Monopoly and Restrictive Trade Practice Act, 1969 was not in consonance with the 1991 policy and there was a need to take a step forward and shift from the monopoly to the competition. Hence, the MRTP Act, 1969 was replaced by the Competition Act, 2002.

The decision of Commission in the case of Reliance Jio had an adverse impact on competition as it adamantly let a new player like Reliance Jio establish its business in the telecom market by providing cheaper offers as compared to the existing companies like Bharti Airtel and even provided free services for a long period of six months and capture the telecom market. The reach and subscriber base of Reliance Industry in other markets is not hidden from anyone and it took this advantage to enter the telecom market as well. Reliance Industries used their financial strength to enter which gave it the status of a dominant position and offered free services to the people all over the country, amounting to predatory pricing. Since Reliance Jio is a result of Reliance Industries, it had unfettered access to the funds and resources of Reliance Industries adding to which was the anti-competitive agreement between the two causing an adverse effect on competition in the telecom industry. Even after proving these contentions at length by Bharti Airtel, Reliance Jio was ordered to continue which goes against the very nature of the Competition Act, 2002.

Even while criticising the order so made by the Commission in Jio's case, we cannot ignore the fact that if Jio had not come up with such offers, we would have not been able to survive the pandemic sitting in our houses and the country's economy would have been very badly impaired. It is Reliance Jio's network which has found the path and made it seep all the way to the rural areas and working from home has become a trend. The fact that Reliance Jio's offers and accessibility has played an important part in saving the Indian economy from crashing and to keep the country moving at this time of COVID-19 pandemic cannot be ignored.

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