Subject: Fwd: Response to TRAI CP on call drops

To: cp@trai.gov.in

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From: Debashish Bhattacharya <debashish.bhattacharya19@gmail.com>

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Smt. Vinod Kotwal Advisor (F&EA-I), TRAI Mahanagar Doorsanchar Bhawan Jawaharlal Nehru Marg New Delhi-110002

Dear Ma'am,

Please find enclosed my personal response as a User of a Mobile Telephone Service for the last 18 years with one of the country's leading TSPs to the TRAI Consultation Paper on "Compensation to the Consumers in the event of Call drops"

Thanks & best regards

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RESPONSE TO TRAI CP ON CALL DROPS

PREAMBLE

Call drops have become a big nuisance. To achieve Digital India vision, the country needs to be connected and stay connected. Digital India is an inclusive vision-must cover all of Rural India besides urban India which is anyway taken as granted.

Urban India is going through this menace where call drops are taking place rampantly, which could lead you to think that Urban India itself is now provided sporadic coverage or coverage in certain pockets and the punchline of " Connected anywhere and everywhere " is no more valid. So, from the days of " limited mobility ", we have now migrated to days of " limited connectivity "!

Let's look at the problem of Call drops. The problem as stated and as understood in very generic or layman terms means that your voice call after getting connected to the called party drops after some finite time. In technical terms, it means that signalling resources are available in the network to set up a call. Of course, after the call is set up, the call is unable to continue due to a variety of reasons and you would need to again set up another fresh session and so on...

Let us look at what could be the reasons for the call drops.

- 1) **Spectrum**: If the Operator did not have spectrum or had inadequate spectrum, the call would either not go through or would not get completed.
- 2) **Towers:** If there were not adequate towers , the call after being initiated/started, would not get handed over to the next tower if you were on the move , once you moved out of your home location.

The Towers issue is a big one as it has many angles to it

- a) The Role of The Local Municipalities
- b) The Role of the Residents Welfare Associations
- c) The **Administrative Costs** charged by local authorities
- d) The time limit for granting approvals by local authorities and the inordinate delays due to flimsy reasons
- e) Citizens' misguided fears of radiation risks

All the above have created an artificial scarcity of towers and have also caused network disruption by shutting down of existing towers due to one or a combination of the above reasons

- 3) **Network Infrastructure**: If you had spectrum and you had towers but did not have sufficient infrastructure to process the number of concurrent sessions/calls, obviously the calls would either not get initiated or would drop.
- 4) **Network Optimisation**: If you had everything viz. spectrum, towers , infrastructure , but still the calls dropped in certain directions or certain areas which are within vicinity, it could be a case of realignment/optimisation requirement .
- 5) **Signal intrusion**: where the operator's signals are being jammed or hijacked deliberately by some method

Obviously TRAI document focuses not on the possible causes of the call drops but what recourse should be there with the customer/consumer of such services when the call drops happen. Of course, TRAI briefly touches upon the role of the operators and drops suggestions on inadequate investment on network infrastructure. What is even more startling is TRAI alluding to priority of data over voice services by the operators . (3G/4G over 2G) . Obviously investment in 2G infra is passe now and most of the investment in network infra is bound to happen on the 3G & 4G side. And why not, has the Government issued any new 2G spectrum which is more than it had done earlier . Almost all the additional spectrum that has been issued in the recent auctions is in the 3G and 4G band. Hence, it is realistic to assume that operators would invest more to augment the network to cater to the fastest growth segment viz. data. which is 3G & 4G .

As an enlightened consumer, i feel that I do not and should not care whether the problem lies with the Govt, or the municipalities or the operator. I only care for the service for which i pay a fixed charge to the operator besides a variable charge for the (data/voice)pipe size and time that I consume. So, my basic point is that if I don' get service for which I am paying day-after-day, month-after-month, year-after -year, and if portability is of no use as all the operators are in the same boat, then what should I do?

Answer probably is: Give up the Mobile and go back to the Good old Fixed line Telephone. Unfortunately, here also our Govt. policies have been so warped that we have killed the fixed line telephony to promote the vested interests in the mobile telephony.

However, a practical way out is to ask the Operator that if you can't give me the service and if every day, the number of call drops are greater than the statutory limit of 2% and if that is also the monthly average, I (the consumer) deserve the right to ask for full compensation/refund or free service till you can provide me uninterrupted service.

ANSWERS TO TRAI CP's QUESTIONS:

<u>Answer to Q1</u>: YES-i agree that no charging should be done for any call that is dropped. This should be irrespective of the duration of call, after which the call was dropped- 5 seconds or 5 minutes or 50 minutes...NO DROPPED CALL SHOULD BE CHARGED IRRESPECTIVE OF ITS DURATION.

Answer to Q2: YES-I agree. Compensation for Call drops to consumers must be there .

Method of Compensation:

If call drop is sporadic, then the number of minutes spoken should be credited to the talk time and the dropped call should not be charged at all.

However, if the call drop is frequent , then it that case, the operator must provide free service for the entire billing cycle.

Any other method:

Please refer to my answer to Question No. 1

Answer to Question 3:

Any Call drop: No Charging for dropped call, irrespective of the duration of the dropped call

Full talk time for the dropped call(s) should be credited to the customer

If the Call drops are too frequent, then the Operator should provide free service for the entire billing cycle or refund the entire recharge amount to the prepaid customer.

Answer to Question No.4:

Other issues:

The impact of liberalised spectrum sharing & trading to resolve the spectrum crunch must be considered.

TRAI along with DOT must take up the implementation of the National Tower Policy with an iron hand and defeat all forces which are coming in way of impeding the growth of towers and also leading to shutting down of existing towers thereby causing serious coverage and connectivity issues.

Last but not the least, TRAI must come up with a policy (in conjunction with DOT) of incentivising operators who bring the Call drop percentage to below 1% with a corresponding rebate in license fees or outgo in terms of taxes etc. This could motivate the operators to deliver better quality of service, thereby leading to higher consumer satisfaction and higher revenues to the operators.

The Government, will be able to thereby earn much more from the increased revenues (AGR) and hence earn higher license fees which shall compensate the percentage drop in license fees due to incentivisation.