



Association of Unified Telecom Service Providers of India

AUSPI/12/2014/ 040

12th June 2014

Shri A.Robert J.Ravi,
Advisor (QoS),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi - 110002.

Sub: AUSPI's Response to TRAI Consultation Paper No.4/ 2014 on "Review of Standards of Quality of Service of Basic Telephone Service (Wireline) and Cellular Mobile Telephone Services"

Dear Sir,

Attached please find AUSPI's Response to the TRAI Consultation Paper on "Review of Standards of Quality of Service of Basic Telephone Service (Wireline) and Cellular Mobile Telephone Services"

We request the Authority to kindly take AUSPI's views into consideration.

Thanking you,

Yours faithfully,

Ashok Sud
Secretary General

Mob: 9312941515

Copy to :

1. Dr. Rahul Khullar, Chairman, TRAI
2. Shri R K Arnold, Member, TRAI
3. Smt. Vijayalakshmy K Gupta, Member, TRAI
4. Shri Sudhir Gupta, Secretary, TRAI

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AUSPI's Response to the TRAI's Consultation Paper No.04/2014 on Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular/ Mobile Telephone Services

Wireless networks are becoming more and more ubiquitous and our member service providers are offering wide range of services to meet the competitive environment and at the same time TSPs try to maintain quality and reliability. If operators don't keep a self-check and measure their own performance, they can't maintain high service quality or address performance and quality issues as when they arise. Hence as a regular practice Operators at their end do independent monitoring of the networks and other customer service aspects so that they can become more competitive by addressing customer satisfaction, capacity, service and quality issues.

It is imperative for the TSPs to regularly monitor their networks to provide good quality of service to the customers. In today's scenario of MNP, the operators are under pressure to maintain their QoS standards, for them to sustain in the market. Hence, QoS are driven by market forces and a light touch approach should be adopted for QoS benchmarks.

Considering the best efforts of TSPs and market mechanism/competition to take care of QoS benchmark, we strongly suggest that the financial disincentives should be removed on QoS parameters.

AUSPI's comments on the specific issues raised by TRAI in the Consultation paper on 'Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services' are as follows:-

- Q1. In your view, does the benchmark for the parameter "Fault incidences (No. of faults/100 subscribers/ month)" for Basic Telephone Service need revision? If so, what should be the benchmark? Please give your comments with justification.**
- Q2. In your view, does the benchmark for parameter "Fault Repair by next working day" for Basic Telephone Service need revision? If so, what should be the benchmark for faults repaired by next working day and by 3, 5 or 7 days? Please give your comments with justification.**
- Q3. What are your views on relaxing the benchmark for parameter "Mean Time to Repair (MTTR) to ≤ 12 Hrs" for Basic Telephone Service? Please give your comments with justification.**

The basic services (wireline) are mostly provided through underground cables. There are issues faced by TSPs as follows:-

- a) Underground cables damaged due to development work undertaken by various civic agencies.
- b) Cases of theft related to underground and duct cables or cases where the underground cable has got corroded(in coastal regions)
- c) Delay in restoration due to law & order issues

There is a need of revision as the reasons in delay to attending to the customer's complaint could be for the following reasons:

- o Many a times, the faults repair gets delayed in cases wherein there is an issue with the connections / equipment at customer premises, however, the same cannot be rectified due to non-availability of customer during the visit to his premises.
- o The time of registering the complaint
- o Delay in permission for repairs

Besides the above stated reasons, there are certain aspects of ROW/PROW from government agencies not available, Electricity / Power supply not available due to State Electricity Power failures, Heavy rainfall /floods. These reasons should also be defined for the exclusion and calculation for data submission.

TSPs are putting best of their efforts in restoring the faults at the earliest, they face challenges in the restoration works which is beyond their control. We, therefore, suggest changes in the existing parameters as follows:-

Sr. No	Parameter	Our request for New benchmark
1	Fault incidences (No. of faults / 100 Subs / month)	≤10%
2	Fault repair by next working day	In rural areas : (a)70% by next working day (b) 80% within 3 working days (c) 90% within 5 working days (d) 100% within 7 working

		<p>days</p> <p>In urban areas :</p> <p>(a) 70% by next working day</p> <p>(b) 85% within 3 working days</p> <p>(c) 95% within 5 working days</p> <p>(d) 100% within 7 working days</p>
3	Mean Time to Repair (MTTR)	≤12

- Q4. What are your views on removing the parameters for Basic Telephone Service (a) Call Completion Rate within a local network or, (b) Answer to Seizure Ratio (ASR) from reporting of compliance to TRAI? Please give your comments with justification.**

Since, the values of ASR provides an indication of Quality of Service provided by the switching system, hence, it is felt that ASR should be part of compliance reporting for checking the QoS of TSPs. However, in case of any non-compliance, no financial disincentive should be levied on the TSP.

- Q5. In your view, does the benchmark for parameter "Resolution of billing/charging complaints" for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.**

Though the existing benchmark of 4 weeks is the sufficient time for resolution of complaints pertaining to billing and charging disputes. However, it should exclude the billing / charging disputes related to International roaming subscribers as it takes time to exchange the International roaming CDRs. Depending on the nature of the billing complaint TRAI may look into this parameter and prescribe 98 % resolution within 4 weeks and 100% resolution within 5 weeks.

- Q6. In your view, does the benchmark for parameter "Period of applying credit/waiver/ adjustment to customer's account from the date of resolution of complaints" for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.**

The existing benchmark of 1 week period for applying credit / waiver / adjustment to customer's account from the date of resolution of complaints seems to be sufficient, and hence, we do not suggest any changes in the existing benchmark except for cases related to disputes in International Roaming.

- Q7. In your view, does the benchmark for parameter "Percentage of calls answered by the operators (voice to voice) within 60 seconds" for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Can the 'Percentage of calls answered by the operators (voice to voice)' be made within 90 seconds instead of 60 seconds? Please give your comments with justification.**

All TSPs have set up mechanisms to address the need and demands of their customers and to provide them with a good quality experience. They do ensure that the accessibility to customers care is easy and effective. TSPs try and ensure that the resources in the call centre are augmented as per the needs and requirements (e.g during a product launch, network downtime).

Further, TSPs have setup different self-help options/mechanisms for customer's like Short Text Messages, emails, brochures, websites, commercials and advertisements, etc., to address the queries of their customers and to provide the necessary information related to customer service. However, voice call is still the preferred mode of customers to get their queries resolved by contacting the call centre executive. With the development of new technology and increase in data services, not only the calls made by the subscribers to speak to the call centres executive has risen but also the average duration period of each call has witnessed manifold increase.

In view of the above, we request TRAI's that the said parameter should be revised to 90-120 seconds instead the existing 60 seconds as there are exigencies that are not always in the hands of TSPs and maintaining the same in 60 seconds leads to prohibitive costs .

- Q8. Shall the benchmark for parameter "Termination/ closure of service" for Basic Telephone Service and Cellular Mobile Telephone Service be revised? If so, what shall be the revised benchmark? Please give your comments with justification.**

We support the view of revising the said parameter considering the challenges faced by TSPs in meeting the existing benchmark for various reasons Viz. Delayed recovery of Customer Premise Equipment (CPE) due to customer convenience & availability etc.

We, therefore, request that this parameter be relaxed to 95% within 7 days of registration of request for closure of service.

Additional comments

We welcome TRAI initiative to do away with some of the parameters wherein all operators are meeting the prescribed benchmark. In this regard, we would also like to suggest that the same principle also ought to be extended to the parameters of **Call Set-up Success Rate (within licensee's own network) SDCCH/ Paging Chl. Congestion and TCH Congestion** for cellular mobile services, as in the case of these parameters too, virtually all the service providers have been meeting the prescribed benchmarks from last many quarters.
