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

To

Shri Tej Pal Singh,
Advisor (QoS)-I
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg, New Delhi-110002

No: BSNLCO-RGLN/29/9/2020-REGLN dated 01-05-2023

Subject: Comments of BSNL on draft Regulation on the Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2023.

Please find below the comments of BSNL on the draft Regulation on the Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2023.

Quality of Service (Code of practice for metering and billing accuracy) Regulations, 2023		
Draft Regulation no.	Description	Comments of BSNL
8	Submission of audit report and action taken report	Submitting Action Taken Reports every quarter will require more time, staff and infrastructure. The process will become more complicated. It will be difficult to handle especially because of the enhanced size work. Hence, it is suggested that submission of audit report and Action Taken Reports to TRAI should be done yearly as per current procedure.
9	Consequences for failure of the service provider to submit audit report or action taken report.	Penal provisions like financial disincentives may not be levied as consequence for failure of service providers to submit report and action taken reports within timelines. Proposed penalty is exorbitant, the objective of Regulation should not be to penalize service providers, but the improvement of system. Therefore, any penalty imposed should be symbolic. It should be in the tune of 10K per service provider.

		Also, the M&B system is centralized system for TSPs, therefore, instead of imposing penalty LSA wise, it should be a single penalty for an Operator.
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Code of Practice for Metering and billing accuracy (Schedule)		
Para no.	Description	Comments of BSNL
1	Information relating to tariffs	<p>In the era of digitization where customer is well versed with various digital platforms, it is prudent to shun away older and primitive method of providing welcome letters physically, rather various digital means should be adopted to welcome customer.</p> <p>Sending such details through a link over SMS is simplest alternate to this. Printing and posting mails to customers is also a Regulatory cost burden on TSPs.</p> <p>Now a days, there are so many other popular, efficient and economic digital platforms like SMS, USSD, IVRS, selfcare portals, helplines, websites and Apps are available where information relating to Tariffs and Terms & Conditions of the Tariff plans are being made available easily to the customers. Hence, there should be no need of imposing old "Welcome Letter".</p>
8	Complaint handling	It is seen that negligible cases of billing complaints have been observed during past audits of metering and billing system. Hence, the current guidelines issued by the Authority are comprehensive enough to deal with various kinds of billing complaints.

Yours faithfully



01.05.2023

(Ved Prakash Verma)

DGM (Regulation-II)

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