

13th August 2010

Mr. Mathew Palamattam
Joint Advisor (CA)
Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhavan
New Delhi

Dear Mr. Palamattam

**Consultation Paper on Review of measures to protect
Interest of consumers in the telecom Sector**

I have studied the consultation paper on the above subject and following are our observations/comments on this.

Review of QOS Parameters:

Page 45 2.11

Benchmark for provision of a landline telephone – 7 days after complete Documents are received

Do you agree thatmay be removed?

Yes, provided the service provider accepts self regulation.

Page 46 2.16

Do you suggest any changes to the benchmark?

No change required in benchmarks but subscriber should be able to access Information regarding his complaint, to claim rebate.

Page 47

What framework do you suggest to ensure payment

Adjustment in subsequent bill.

2.18

Do you propose any changes to existing provisions relating to shift

Parameters applicable for both Basic Telephone Service and Cellular Mobile Telephone service

No

Page 49 2.22

Do you suggest any change in existing provisions

Refunds after deduction of dues to be made immediately after termination

Do you agree with the suggestions

Yes.

Page 50 2.25

Do you agree with the time period of 4 weeks

Yes.

Page 51 2.28 Do you agree with present provisions ...

Yes

Page 55 2.42

What method of alert do you prefer for premium service calls?

Response giving rates and seeking consent to go forward.

Page 56 2.44 What information in your view should be provided to prepaid subscribers

Time, duration of call, rate and balance available.

Page 57 2.46 What information do you feel is necessary after recharging ...

Recharge value, talk time available.

Page 73 3.53

1. Common number for all networks with easy accessibility from any number

2. Yes

3. Yes

Page 74 3.56

1. Yes

2. Yes

3. Yes

Page 84

3.87 – What should be done to improve accessibility...?

Release advertisement print media.

Page 85 3.89

Timeframe for redressal of grievances by Nodal Officer – 2 days

What should be done to ensure redressal of grievances within prescribed timeframe?

Post all complaints and status of complaints on website with access to Complainant.

Page 85 3.91

What framework do you perceive

Allow access to complaints on website.

Page 86 3.94 What are your views regarding charging of nodal officer number ...

No – calls to this number should not be charged. It is a part of consumer Complaint redressal mechanism which should be provided by service provider as part of the 3 tier system mandated by TRAI.

3.97 Increase number of advertisements to increase awareness.

3.98 Framework for filing of appeals – downloadable form on website

Page 88 3.103 Time frame for acknowledgement of appeal – immediate acknowledgement by means of autoresponder if done online or by means of a Template letter

Page 89 3.105 feedback on the disposal of appeal.....

Information should be updated on website

Page 95 4.7 – Measures to effectively control provision of VAS ...

- 1. Subscriber who opts for the service to send SMS**
- 2. Service provider to confirm to subscriber about request**
- 3. Subscriber to reconfirm by SMS**
- 4. Service provider to provide VAS**

Page 96 4.9 Additional measures to increase effectiveness of consumer Education....

SMS for Realty Shows on TV

SMS charges to be clearly displayed on TV Screen in larger fonts. Press ads Also to carry this information.

Page 97 Effectiveness of web based grievance redressal....

This section on website to be easily accessible to subscribers. Service Providers can be asked to update the information on complaint redressal For their subscribers and post it on this page.

Consumer groups can also be allowed access to this information – maybe Restricted to registered CAGs.

TRAI to update information on registered CAGs on their website.