महानगर टेलीफोन निगम लि॰
(भारत सरकार का उद्यम)
Mahanagar Telephone Nigam Ltd.
(A Government of India Enterprise)
CIN: L32101DL1986GOI023501

No: MTNL/RA/TRAI CP/ Metering & Billing/2020
Dated 27.10.2020

Advisor (QoS),
Telecom Regulatory Authority of India (TRAI),
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg, (Old Minto Road)
New Delhi – 110002

Sub: **Consultation Paper on Review of "The Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006"**

Sir,

Please find below the MTNL's comments on Consultation Paper on "Review of "The Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006" as follows:

Q.1: What changes are suggested in the sampling methodology in order to make it more representative of the post-paid and prepaid user segments or different types of tariff plans? Should the full spectrum of tariff plans be subject to audit? What considerations are required to be taken to address the issues or concerns related to the incidences of wrong charging specially in case of data packs, STVs, multiple tariff packs at a time, etc.? Please give your views with detailed justification.

MTNL Reply: The current methodology of sampling as per provisions in the Regulation 6A, to assess the compliance of Code of practice (CoP) , sample plans selected for audit purposes are equal in numbers for post-paid & prepaid segment, whereas there is huge variance in the number of subscribers in these two segments. Therefore, the sampling methodology may be based on the percentage of number of subscriber in pre-paid & Post-paid

plans. However, further sampling based on sub-category (tariff plan wise) need not to be changed.

In respect of fixed line network, most of the customers are having postpaid plans. Hence the existing sampling methodology is adequate. The plans only with higher subscriber base should be audited.

In respect of mobile services, customer base of postpaid users is very small. There are limited tariff plans on offer. The count of all the plans is shared with the auditor, based on that the sample plans are selected for audit. This existing sampling method seems to be appropriate. Whereas, 95% of mobile customers are in Prepaid segment and most of them are using STVs offering a fixed data limit such as 1Gb/2Gb/3Gb per day and unlimited voice calls. Sample may be taken from most popular STVs.

Q.2: How IT tools and new technologies can be used to adopt preventive and proactive ways to avoid occurrences of error in charging or wrong configurations leading to charging? Whether the IT capabilities of other systems available with the service provider may be made available to the auditor for audit purposes? How such tools developed for rigorous testing before launch of new tariff plans can also be used for audit purposes? Please give your views with detailed justification.

MTNL Reply:

Various IT tools and new technologies are being used by TSPs for checking and configuring the new plans. The details can be gathered from the service providers of all the new plans configured during the year and sample bills can be taken of the plans to check. The CDRs for such Sample Plans and STVs may be checked by the auditors in IT software tools only, because raw data is too large to be viewed and checked.

To avoid occurrences of error in charging or wrong configurations across the multiple modes, MTNL has already installed its Fraud Management and Control Centre (FMCC) .This could be utilized for audit purpose also.

Q.3: With the evolution of new technologies and mediums to provide information related to terms and conditions, tariff details to the customers at the time of subscriptions or making it available as and when

required by the customers, what changes are required to assess delivery of information in timely and appropriate manner? Please give your views with detailed justification.

MTNL Reply:

The tariff details are being provided to the customers at the time of subscriptions. MTNL has provided various other communication channels to the customer to know about tariff details. The customer may query through USSD message, IVR system, customer care agents, self care system, help lines etc. The details are also available online through website. MTNL has made available a self-care portal to its customers to access the required information at any time. "MyMTNL" App provided to the customer is the most convenient method to access complete information and access various facilities/services provided to the customer

MTNL is already complying to the Directions issued by TRAI on tariff publications and advertisements. The tariffs are also available on TRAI website. There are sufficient sources available for customer information.

Moreover, the information related to tariff plan and related & conditions are already standardized by TRAI and being published at TSPs portal regularly to make it transparent to the customer. Such information also updated at PoS and retail outlets by service providers. With the evolution of new technologies, mode of communication has already been eased among stakeholders. Therefore, no changes are suggested provide delivery of information in timely and appropriate manner to the customer. However, Chat bot (Artificial Intelligence Network) on the TSP website can help further.

Q.4: **What IT-enabled measures need to be considered to ensure consistency of the tariff information across the different channels or mediums? Please give your views with detailed justification.**

MTNL Reply: To maintain the accuracy and consistency of tariff information across the different channels, a single place of storing of information (master database) can be more effective which can be accessed through different channels or medium using the availability of IT platforms.

Q.5: What changes are suggested in handling of billing complaints? Whether defining what constitutes billing complaint may help in bringing uniformity? Whether higher frequency of audit of complaint handling would help in improving effectiveness of complaint redressal mechanism? Please give your views with detailed justification.

MTNL Reply:

Genuine Billing complaints are very rare in MTNL. Moreover, there is already an effective procedure in place to mitigate subscriber complaints. Subscriber can even visit the offices of MTNL to meet senior officers for early redressal of billing grievances. Higher frequency of audit of billing complaints may not be a help as TSPs are already sensitive towards customer's grievances. At this time of fierce competition, no operator can afford to lose its customers by ignoring the billing

The current guidelines are comprehensive enough to deal with various kinds of billing complaints.

Q.6: To conduct special or peer audit, where old records might be required to carry out the audit, what may be prescribed to ensure that the relevant details are maintained for sufficiently long period and made available to the auditor in a timely manner for conducting the audit? Please give your views with detailed justification.

MTNL Reply:

The existing procedure may be continued. New plans keep on launching very frequently, accordingly there are rapid changes take place, therefore, storing historical data will not be required.

Also, as per the Unified license condition clause no 39.20, "the Licensee shall maintain all commercial records/ Call Detail Record (CDR)/ Exchange Detail Record (EDR)/ IP Detail Record (IPDR) with regard to the communications exchanged on the network. Such records shall be archived for **at least one year** for scrutiny by the Licensor for security reasons and may be destroyed thereafter unless directed otherwise by the Licensor."
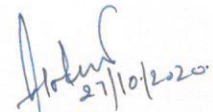
One year is a sufficient time to carry out such audit. MTNL not in the favour to increase the duration of keeping old records.

Q.7: Should the Regulation 6C, Regulation 6D and Regulation 6E of the regulations dealing with consequence for failure of the service providers to submit audit report and action taken report, consequence for failure of the service providers to refund overcharged amounts to customers and consequence for failure to provide comments on audit observations in the Action taken report respectively be retained as it is or they need to be altered/strengthened.Pl support your views with rationale.

MTNL Reply: The existing regulations should be continued since they are adequately spelling out the consequences of failure in carrying out these activities.

Q.8: Any other issues which are relevant to this subject.

MTNL reply: No comment

27/10/2020

(Alok kumar)

Manager-Regulation