



14th December 2023

Advisor (QoS 1)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg, (Old Minto Road)
New Delhi - 110002

Subject: Consultation Paper on "Review of Quality-of-Service Standards for Access Services (Wireless and Wireline) and Broadband Services (Wireless and Wireline)".

Dear Sir,

This is in reference to the Consultation Paper issued by the Authority on 18th August 2023 regarding "Review of Quality-of-Service Standards for Access Services (Wireless and Wireline) and Broadband Services (Wireless and Wireline)".

In this regard, we, Tata Teleservices Limited (TTSL) and Tata Teleservices (Maharashtra) Limited [together called "TTL"] hereby enclose our response to the questions raised in your above-mentioned Consultation Paper.

We believe TTL response will be given due consideration.

Thanking you and assuring you of our best attention always

Thanking you,

Yours sincerely,

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Response to TRAI Consultation Paper on “Review of Quality-of-Service Standards for Access Services (Wireless and Wireline) and Broadband Services (Wireless and Wireline).

Introduction:

TTL welcomes TRAI's initiative for giving us the opportunity to respond to the consultation paper, considering the practical and genuine difficulties faced by the TSPs in maintaining the wireline networks. The current QOS benchmarks prescribed for the wire line are already so stringent that they can't be met in spite of the best efforts and resources put in by all the TSPs for maintaining the wire line networks. Therefore, we request that considering the best efforts of TSPs and market mechanism/competition/strain on the wireline networks due to reduction of demand the QoS benchmarks needs to be revised and the financial disincentives should be dispensed with on wireline QoS parameters.

TRAI has proposed requirement of shifting from quarterly reporting to monthly reporting, without addressing the issues facing the telecom sector specially Wireline, it is unclear if merely applying more benchmarks and reporting more frequently can improve Quality of Service (QoS) and improve the lives of customers, relying solely on monthly averages is not an accurate representation of the Indian telecom business. Choosing quarterly averaging yields a more thorough summary and effectively reduces the effect of variations over a shorter period of time, giving a sharper picture. The utilization of quarterly averaging is a statistically valid method for calculating average quality of service metrics in the telecommunications industry. By reducing the influence of transient variations and producing more robust averages, sample size stability guarantees accurate evaluations. Because it gives a more realistic picture of overall performance, this stability is especially important for quality-of-service criteria. so it is submitted that assessment and reporting on monthly basis and at State/UT level should not be proposed and TRAI should continue with the present practice of quarterly averaging.

TTL'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:



Question-1: What are the possible reasons for increasing gaps between the QoS reported by the service providers and the QoS experienced by the consumers? How this gap can be bridged?

TTL Response: We disagree with the proposition that there is a gap in QoS reported and QoS experienced by the customers and that this gap is widening. In Wireline, the KPIs which are reported are uptime, latency, and throughput. These KPIs are what is experienced by customer, and hence QoS experienced by consumers will be similar to what is reported. The granularity of the testing or monitoring of the usage at last mile can be one of the reasons for gap between the QoS reported by customer and the Service provider.

While operator is monitoring the network under its control, customer experience is also dependent on the network availability and performance of application servers which they want to access, and can be beyond the control of Service Provider, which is also a reason for reported gap between customer experience and Service Provider's experience.

Question-2: To support emerging applications and use cases please suggest a transparent framework for measurement and reporting of QoS and QoE especially in 4G and 5G networks considering relevant standards and global best practices.

TTL Response: Not applicable to TTL, being a Wireline operator.

Question-3: What should be the QoS parameters and corresponding benchmarks for ultra-reliable low latency communication (uRLLC)), and massive machine type communications (mMTC)?

TTL Response: Not applicable to TTL, being a Wireline operator.

Question-4: Will there be any likely adverse impact on existing consumer voice(VoLTE/VoNR) and data services (eMBB) upon rollout of enterprise use cases of uRLLC or mMTC?

TTL Response: Not applicable to TTL, being a Wireline operator.

Question-5: If answer to Question-4 is 'No' then please explain how and if the answer is 'Yes' please suggest measures to ensure minimum guaranteed QoS for voice and data service for consumers.

TTL Response: Not applicable to TTL, being a Wireline operator.



Question-6: To achieve QoS and QoE end-to-end, it is essential that all network segments deliver the minimum level of QoS required by respective service, application or use case. In this context, please suggest QoS parameters and corresponding benchmarks for National Long Distance (NLD) and International Long Distance (ILD) segments of the network with supporting global benchmarks.

TTL Response: There isn't a precedent for QoS regulation or monitoring for carrier services worldwide. Thus, we reaffirm that this aspect does not require modification. NLD Network as compared to metro network, is characterized by the long distance of fiber going upto 1000+ Kms between major cities. The QoS Parameters of the network for wired connectivity on OTN/DWDM should be Latency, and Unavailable seconds.

Question-7: What should be the approach for adoption of 'QoS by Design' framework by the service providers to ensure that new generation wireless networks are planned, implemented and maintained to deliver required level of measurable QoS and QoE?

TTL Response: Not applicable to TTL, being a Wireline operator.

Question-8: What measures are required to accelerate the adoption of AI for management of QoE to reduce consumer complaints protectively and to enable near real time reporting of QoS performance to consumers.

TTL Response: AI for QoE requires capturing of customer usage stats at UE level. The OEMs should be encouraged to install/ facilitate addition of QoE application in the CPE.

These QoE applications as client software should be approved to be installed in CPE. Service providers should be allowed to define own QoE parameters organically, which can be studied in detail later to standardize. QoE parameters can be in term QoE for HTTP, video and interactive services etc.



**THE STANDARDS OF QUALITY OF SERVICE OF ACCESS SERVICE (WIREFINE AND WIRELESS) AND BROADBAND SERVICE
(WIREFINE) REGULATIONS, 2023' Chapter 3**

Sl. No.	Ch./Sec. No.	RegIn.No. / Cl. No.	Proposed provision in Consultation Paper	Suggested modification	Justification / Global references with supporting data points if any.
1.	Section-I PRELIMINARY				
2.	1. Short title, commencement, and application				
3.	1	1(2)	They shall come into force with effect from	TTL have developed and incorporated the current TRAI/DOT guidelines into our systems for reporting to TRAI, so we request that the current QoS regulation shouldn't be changed. In case revised regulations are finalized then for the implementation of the same TTL needs at around five years after the date of notification.	We would like to submit that the proposed regulation is not viable to comply. To implement the proposed/revised QoS regulations it would require significant changes in current systems. This is a humongous task and would require minimum five years for the system integration process for all of these activities.
4.	1	1(3) (i)	These regulations shall apply to all service providers, having-	No comments	
5.	1	1(3) (ii)	(i) Unified Access Service License		
6.	1	1(3)(iii)	(ii) Unified License with authorization for Access Service; (iii) Internet Service Authorisation under any License.		



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Sl. No.	Ch./Sec. No.	RegIn.No. / Cl. No.	Proposed provision in Consultation Paper	Suggested modification	Justification / Global references with supporting data points if any.
7.	Section-II QUALITY OF SERVICE (QoS) PARAMETERS FOR ACCESS SERVICE(WIREFINE)				
8.	2. Quality of Service Parameters in respect of which compliance reports are to be submitted to the Authority				
9.	2	3(1)(i)	Provision of a service within 7 days of payment of demand note by the applicant Benchmark: 100% Average over a period: 1 Month	This parameter should be completely removed	This parameter should be completely removed. For this parameter the proposed benchmark required is 100% which is in idealistic scenario and cannot be achieved due to practical difficulties which at time are beyond the service provider control like ROW or customer issues/reasons like the customer's unavailability, internal wiring issues, etc. It is our humble request that there should not be any parameter which has 100% benchmark mandated in the draft regulation. Instead, we would suggest that maximum of 95% be kept which is realistic and achievable considering the different challenges, constraints that service provider have to face. Service provides assure that they will closely monitor how they can improve upon the quality parameter so that customer satisfaction level enhanced and there is closure of all cases within realistic timelines which can be achieved.



10.	2	3(1)(ii)	<p>Fault incidences (No. of faults per 100 subscribers per month)</p> <p>Benchmark: ≤ 5</p> <p>Average over a period: one month</p>	<p>We submit that Benchmark should not be changed from <7% to <5%.</p> <p>Also, we request that the current benchmarks and parameters be kept in place on a quarterly basis.</p>	<p>There are various practical difficulties which service providers face leading to fault which are caused due to factors beyond service providers' control. Some of these are heavy rains in rainy seasons and poor drainage system leading to flooding, delays in granting of permission for the restoration of work, cable cuts by other operators due to their network expansion activities, development work of road expansion, metro rollout in different cities etc leading to damage of underground cable of service providers. Apart from these reasons, faults could be attributed on customers end as well, wiring issue, customer instrument/system related issues. Considering these limitations, we are not agreeing to revise the benchmark from <7% to <5%.</p>
11.	2	3(1)(iii)	<p>Fault repair by next working day in Urban areas</p> <p>Benchmark: $\geq 85\%$</p> <p>Average Over a period: One month</p>	<p>Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly.</p> <p>We request that the current benchmarks and parameters be kept in place on a quarterly basis.</p>	<p>In addition to factors affecting Fault incidences as mentioned in our response for Question #1, there are several other practical problems faced by operators at the time of fault repair, and sometimes leads to more than 15 days for example: 1. Customer Availability at home. 2. Repeated rescheduling of appointment by the customer. 3. Delay in permission for digging. 4. Cable theft/Burnt 5. Approval time to procure the material</p>



					consumption in some areas on account of repeated cuts damages. In light of above constrains there should be not any rent rebate.
12.	2	3(1)(iv)	<p>Fault repair within five days in Urban areas</p> <p>Benchmark: 100%</p> <p>Average Over a period: One month</p>	<p>In urban regions, fault repair is completed in seven working days. A 95% benchmark is ideal.</p> <p>Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly.</p> <p>We request that the current benchmarks and parameters be kept in place on a quarterly basis and also timeline should be defined in working days.</p>	<p>The 100% benchmark in 5 working days is over stringent. There are many issues that prevent 100% compliance, as mentioned above.</p> <p>Every timeline should be defined in working days.</p>
13.	2	3(1)(v)	<p>Fault repair by next working day in rural and hilly areas</p> <p>Benchmark: $\geq 75\%$</p> <p>Average over a period: One month</p>	<p>Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly.</p> <p>We request that the current benchmarks and parameters be kept in place on a quarterly basis.</p>	
14.	2	3(1)(vi)	<p>Fault repair within seven days in rural and hilly areas</p> <p>Benchmark: 100%</p> <p>Average over a period: One month</p>	<p>We recommend maintaining benchmarks at a 95% service restoration rate within 7 working days. Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly.</p>	<p>We recommend maintaining benchmarks at a 95% service restoration rate within 7 working days. This adjustment takes into account the practical constraints beyond the control of TSPs that may prevent achieving 100% compliance within specified time limits.</p>



				We request that the current benchmarks and parameters be kept in place on a quarterly basis and also timeline should be defined in working days	It is also submitted that in a competitive market, the TSPs cannot and will not delay Fault repair intentionally, but unnecessarily harsh benchmarks that are technically unattainable at all times, can have the negative impact on roll-out in sparsely populated areas with limited revenue potential.
15.	2	3(1)(vii)	Mean Time To Repair (MTTR) Benchmark: ≤ 10 hours Average over a period: One month	Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly. We request that the current benchmarks and parameters be kept in place on a quarterly basis.	
16.	2	3(1)(viii)	Metering and billing accuracy – post paid Benchmark: ≤ 0.1% Average over a period: All Bills issued in the month.	This parameter should be completely removed. We request that the current benchmarks and parameters be kept in place on a quarterly basis.	There is no reason to maintain this parameter as TRAI is already conducting metering and billing audits.
17.	2	3(1)(ix)	Metering and billing accuracy -- pre-paid Benchmark: ≤ 0.1% Average over a period: One month	. NA	
18.	2	3(1)(x)	Resolution of billing/ charging complaints within six weeks Benchmark: 100%	Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly.	



			Average over a period: One month	We request that the current benchmarks and parameters be kept in place on a quarterly basis.	
19.	2	3(1)(xi)	Application of credit/ waiver/ adjustment to customer's account within one week from the date of resolution of complaints Benchmark: 100% Average over a period: One month	Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly. We request that the current benchmarks and parameters be kept in place on a quarterly basis.	
20.	2	3(1)(xii)(a)	Accessibility of call centre/ customer care Benchmark: ≥ 95% Average over a period: One month	Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly. We request that the current benchmarks and parameters be kept in place on a quarterly basis.	
21.	2	3(1)(xii)(b)	Percentage of calls answered by the operators (voice to voice) within ninety seconds. Benchmark: ≥ 95% Average over a period: One month	This parameter should be removed from the QoS KPI's.	This parameter should be removed from monitoring due to the following reasons: No Impact on Service Quality: Human interface does not directly impact the quality of service provided by telecom service providers. Technological Advancement: The rapid advancement of technology, including AI-driven automation, have reduced the need for traditional voice-based interactions. Also like in most of the consumer durable companies the



					complaint interface through What's app menu for complaint registration etc.
22.	2	3(1)(xiii)	Termination/ closure of service within seven days Benchmark: 100% Average over a period: One month	Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly. We request that the current benchmarks and parameters be kept in place on a quarterly basis and also timeline should be defined in working days.	
23.	2	3(1)(xiv)	Refund of deposits within 45 days of closures Benchmark: 100% Average over a period: One month	Benchmark for this parameter should not be changed from 60 days to 45 days. Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly. We request that the current benchmarks and parameters be kept in place on a quarterly basis and also timeline should be defined in working days.	60 days is already a stringent timeline for the refund of deposit after the closure of telephone/ termination of service, to handle issues related to dues/bills/settlement of the dispute takes time, so we request Authority to keep the existing provisions regarding the refund of security deposit, a 100% refund of security deposit is to be made within 60 days, failing which 10% per annum interest is payable.
24.	2	3(2)	The compliance of the parameters specified in sub-regulation (1) shall be reported to the Authority by the service provider.	Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly. These parameters should not apply to connectivity solutions given to enterprise customers under wireline. An explicit clarification to this extent, should be provided by TRAI.	



25.	2	3(3)	The Authority may, from time to time, through audit and objective assessment of QoS conducted either by its own officers or employees or through an agency appointed by it, verify and assess the performance of the Quality-of-Service parameters, specified in sub-regulation (1).	We suggest no further changes required against the existing regulation	
26.	4. Quality of Service parameters in respect of which compliance is to be monitored by the service provider and reported to the Authority.				
27.	2	4(1)(i)	Registration of demand for new wireline connection irrespective of technical feasibility Benchmark: 100% Average over a period: One Quarter	This parameter should be completely removed. The reporting period for these QoS parameters should be kept at quarterly rather than monthly in the event that TRAI keeps this parameter.	This should be left for the market forces to decide.
28.	2	4(1)(ii)	Requests for Shift of Telephone Connection to be attended within three days. Benchmark: 95% Average over a period: One quarter	This parameter should be completely removed. The reporting period for these QoS parameters should be kept at quarterly rather than monthly in the event that TRAI keeps this parameter.	There are various practical difficulties beyond the control of service providers'
29.	2	4(1)(iii)(a)	Junctions between local exchanges Benchmark: 0.002 Average over a period: One Quarter	This parameter should be completely removed. The reporting period for these QoS parameters should be kept at quarterly rather than monthly in the event that TRAI keeps this parameter.	
30.	2	4(1)(iii)(b)	Outgoing junctions from Trunk Automatic Exchange (TAX) to local exchange	The reporting period for these QoS parameters should be kept at quarterly rather than monthly in the event that TRAI keeps this parameter.	



			<p>Benchmark: 0.005</p> <p>Average over a period: One Quarter</p>		
31.	2	4(1)(iii)(c)	<p>Incoming junctions from local exchange to TAX</p> <p>Benchmark: 0.005</p> <p>Average over a period: One quarter</p>		
32.	2	4(1)(iii)(d)	<p>Incoming or outgoing junctions between TAX</p> <p>Benchmark: 0.005</p> <p>Average over a period: One Quarter</p>		
33.	2	4(1)(iv)	<p>Point of Interconnection (POI) Congestion (on individual POI) at LSA level</p> <p>Benchmark: ≤ 0.5%</p> <p>Average over a period: One quarter</p>	No changes.	
34.	2	4(2)	<p>The service provider shall monitor the compliance of the parameters and its benchmarks specified under sub-regulation (1) and furnish online quarterly report to the Authority within thirty days of the end of each quarter.</p>	<p>This parameter should not apply to connectivity solutions given to enterprise customers under wireline. An explicit clarification to this extent, should be provided by TRAI.</p> <p>Also, we are not in favour of any additional burden of reporting and any consequent financial disincentive.</p>	



35.	2	4(3)	The service provider shall maintain records of its compliance of the benchmark of each QoS parameter for the access service (wireline) specified in sub-regulation (1).	We suggest no further changes required against the existing regulation	
36.	2	4(4)(a)	The Authority may, if it considers it expedient so to do, and to ensure compliance of the provisions of sub-regulation (1), at any time,— direct any of its officers or employees or an agency appointed by the Authority to inspect the records maintained under sub-regulation (3)	We suggest no further changes required against the existing regulation	
37.	2	4(4)(b)	get the records maintained under sub-regulation (3) audited.	We suggest no further changes required against the existing regulation	



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Sl. No.	Ch./Sec. No.	RegIn.No. / Cl. No.	Proposed provision in Consultation Paper	Suggested modification	Justification / Global references with supporting data points if any.
38.	Section IV QUALITY OF SERVICE (QoS) PARAMETERS FOR BROADBAND SERVICE (WIREFINE AND WIRELESS)				
39.	3. Quality of Service Parameters for which compliance reports are to be submitted to the Authority				
40.	4	9(1) (1)	<p>Latency</p> <p>Benchmark (Wireless): <100 ms (in 4G and 5G network)</p> <p>Benchmark (Wireline): < 50ms</p> <p>Method and Assessment Period: On average basis over a period of one month</p>	<p>We propose that a latency benchmark of less than 120 milliseconds be set for wireline services. Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly.</p> <p>We request that the current benchmarks and parameters be kept in place on a quarterly basis.</p>	<p>we advise keeping the same benchmarks at <120ms for wireline networks.</p>
41.	4	9(1)(2)	<p>Jitter</p> <p>Benchmark (Wireless): \leq 50ms (in 4G and 5G network)</p> <p>Benchmark (Wireline): \leq 40</p> <p>Method and Assessment Period: On average basis over a period of one month</p>	<p>This parameter should be removed from the proposed Draft Regulations.</p>	
42.	4	9(1)(3)	<p>PDP context activation success rate for wireless data service.</p> <p>Benchmark (Wireless): \geq 95%</p>	<p>NA</p>	



			<p>Benchmark (Wireline): -</p> <p>Method and Assessment Period: On average basis over a period of one month</p>		
43.	4	9(1)(4)	<p>Packet drop rate</p> <p>Benchmark (Wireless): $\leq 2\%$</p> <p>Benchmark (Wireline): $\leq 1\%$</p> <p>Method and Assessment Period: On average basis over a period of one month</p>	<p>Instead of being averaged monthly as suggested by TRAI, this parameter should be averaged quarterly.</p> <p>We request that the current benchmarks and parameters be kept in place on a quarterly basis.</p>	
44.	4	9(1)(5)	<p>Minimum download and upload speed against the minimum subscribed speed in offered data plans.</p> <p>Benchmark (Wireless): $>80\%$ of the minimum speed</p> <p>Benchmark (Wireline): 100% of the minimum speed.</p> <p>Method and Assessment Period: On average basis over a period of one month</p>	<p>This parameter ought to be eliminated from the proposed Draft Regulations and should not be required.</p> <p>And this parameter should not be mandated and should be removed from the proposed Draft Regulations.</p>	
45.	4	9(5)	<p>Every service provider shall, in all its Internet service plans, indicate the minimum download and upload speed available to the consumers.</p>		



46.	4. Quality of Service Parameters in respect of which compliance is to be monitored by the service provider and reported to the Authority:			
47.	4	10(1)(i)	<p>Registration of demand for new wireline broadband connection irrespective of technical feasibility.</p> <p>Benchmark (Wireless): -</p> <p>Benchmark(Wireline): 100%</p> <p>Averaged/ measured over a period: One month</p>	<p>This parameter should be completely removed</p>
48.	4	10(1)(ii)	<p>Successful packet data transmission download attempts</p> <p>Benchmark (Wireless): > 80%</p> <p>Benchmark(Wireline): > 95%</p> <p>Averaged/ measured over a period: One month</p>	<p>This parameter ought to be eliminated from the proposed Draft Regulations and should not be required.</p>
49.	4	10(1)(iii)	<p>Successful packet data transmission upload attempts</p> <p>Benchmark (Wireless): > 75%</p> <p>Benchmark(Wireline): > 90%</p> <p>Averaged/ measured over a period: One month</p>	



50.	4	10(1)(iv)	<p>Maximum Bandwidth utilization of any Customer serving node to ISP Gateway Node [Intra-network] or Internet Exchange Point Link(s)</p> <p>Benchmark (Wireline and Wireless): < 80% link(s)/route bandwidth utilization during peak hours (TCBH)</p> <p>Averaged/ measured over a period: One month</p>	This parameter ought to be eliminated from the proposed Draft Regulations and should not be required.	The CP does not provide enough clarification on this parameter.
51.	SECTION V CUSTOMER PERCEPTION OF QUALITY OF SERVICE				
52.	11. Quality of Service Parameters for customer perception of service:				
53.	5	11	The performance of the service providers in respect of benchmarks of each of the following QoS parameters for the access service (wireline), access service (wireless), Broadband service (Wireline) or Broadband Service (Wireless), as the case may be, shall be subject to periodic assessment by the Authority through customer satisfaction surveys, which may be conducted by the Authority either through its own officers or employees or through any agency appointed by it.	This parameter should not be mandated and should be removed from the proposed Draft Regulations	<p>There is no need to rely on survey benchmarks because QoS KPI reporting is being done.</p> <p>Survey results should be the source of feedback. Thus, we request that the draft regulation's suggested parameter be eliminated.</p>
54.	5	11(a)	customers satisfied with the provision of service	This parameter should not be mandated and should be removed from the proposed Draft Regulations	Only surveys can be used to study the parameter and its standard; no precise and measurable value is provided.



			Benchmark: ≥ 90 %	<p>Setting standards is not necessary because this is subjective.</p> <p>a. Further, these parameters should NOT be prescribed as QoS Benchmarks.</p> <p>b. These can be analysed as a part of the survey conducted by TRAI.</p>
55.	5	11(b)	customers satisfied with the billing performance. Benchmark: ≥ 95 %	
56.	5	11(c)	customers satisfied with network performance, reliability and availability. Benchmark: ≥ 95 %	
57.	5	11(d)	customers satisfied with maintainability. Benchmark: ≥ 95 %	
58.	5	11(e)	customers satisfied with supplementary and value added services. Benchmark: ≥ 90 %	
59.	5	11(f)	customers satisfied with help services including customer grievance redressal. Benchmark: ≥ 90 %	
60.	5	11(g)	customers satisfied with overall service quality Benchmark: ≥ 90 %	
61.	SECTION VI			
	RECORD KEEPING, REPORTING AND PUBLICATION OF QUALITY OF SERVICE PERFORMANCE			
62.	13. Reporting			



63.	6	13(1)	<p>Every service provider shall create secure online system within six months of notification of these regulations for collection of primary data, its processing, generation and submission of online compliance reports to the Authority with online access of required supporting primary data in respect of each QoS parameters specified under regulation 3, regulation 4, regulation 6, regulation 7, regulation 9 and regulation 10 in such manner and format, at such periodic intervals and within such time limit as may be specified by the Authority, from time to time, by an order or direction.</p>	<p>The revised regulation should only mandate only providing the report through online access. The requirement to provide raw data should be removed.</p>	<p>We have designed our systems to meet the needs of several departments; the production of QoS reports follows the extraction and evaluation of numerous data kinds. the process of generation of reports requires manual activities as well. We are unable to submit in the format that the authority requires.</p>
64.	6	13(2)	<p>The benchmark of each QoS parameters specified in sub-regulation (1) shall be measured, reported, and complied at State or Union Territory (UT) and License Service Area level, as may be specified by order or direction issued by the Authority time to time: Provided that the Authority may notify list of districts and QoS parameters for measurement, reporting and compliance of QoS benchmarks based on identification of areas experiencing degraded QoS.</p>	<p>The state/UT level provision ought to be removed. Reporting parameters ought to be maintained at the LSA level.</p>	<p>As per the license, we have designed our systems and processes on the basis of LSA-wise reporting only. Any changes to the reporting and data extraction processes that go beyond the current criteria would necessitate changes to the systems and procedures, which would be a massive task requiring both financial and human resources.</p> <p>Also, the suggested parameter deviates significantly from the licensing framework and goes against</p>



					<p>the network architecture that the TSPs created at LSA.</p> <p>Thus, it is recommended that the current LSA level reporting practices be continued.</p>
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