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Subject: Response to consultation paper on "Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services".

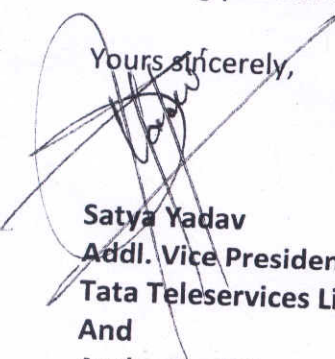
Dear Sir,

This is in reference to your Consultation Paper No. 4/2014 dated 21st May 2014 on "Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services".

As desired, we hereby enclose our response to the questions raised in your above-mentioned consultation paper. We sincerely hope that our views would be given due cognizance.

Thanking you and assuring you of our best attention always.

Yours sincerely,


Satya Yadav
Addl. Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
Tata Teleservices (Maharashtra) limited

Enclosure: As above

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Tata Teleservices response to TRAI consultation paper on "Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services"

Question 1:

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.

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Question 2:

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.

TTL response:

On the basis of the various representations given by the TSPs and as has highlighted in the Consultation paper. There is a need to revise the benchmark of Fault incidences (No. of faults/100 subscribers/ month) to $\leq 10\%$.

The reasons for requesting for change are as follows:

1. Underground cables get damaged due to uninformed and random development work undertaken by various civic agencies.
2. Cases of theft related to underground and duct cables.
3. Delay in restoration due to law & order issues

We also want to submit that the parameter needs revision because seasonal changes make it difficult to meet parameters in monsoon. The existing power conditions in certain regions do not allow continuous power supply affecting services. Similarly the RoW permission rights are not standard for many circles, delaying the repair.

These parameters need revision with respect to calculation for the data to be submitted. Reasons for not achieving has to be defined what is within scope of TSP and the one not in scope of TSP. For example reasons for not achieving the parameter like ROW/PROW from government agencies not available to have permanent fix, Electricity / Power supply not available due to State Electricity Power failures, Heavy rain fall and floods. These reasons have to be defined for the exclusion and calculation for data submission for the month.



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

1. Non availability of the customer at the time of visit by TSPs
2. The time of registering the complaint
3. Delay in permission for repairs

Hence, we suggest that these benchmarks should be relaxed in terms of Urban, Rural and hilly areas.

Question 3:

What are your views on relaxing the benchmark for parameter "Mean Time to Repair (MTTR) to \leq 12 Hrs" for Basic Telephone Service? Please give your comments with justification.

TTL Response:

There is need to relax this parameter as many times due to unforeseen reasons there could be a delay in getting permission from local bodies/civic authorities for restoration.

Also, the MTTR needs to be 36 hours, keeping in view the challenges highlighted in Q1. This may not significantly affect customers considering the mobile penetration now in all circles.

MTTR can be measured on same benchmark, but reasons for delay due to reasons mentioned in Q1 may be considered for exclusion.

Question 4:

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.

TTL Response:

The existing benchmarks for these parameters are being met with by the TSPs and there are no technical constraints in meeting the set parameters. Thus there is no need to monitor the same by the Authority and the same be best left to the TSPs for self monitoring.



Question 5:

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.

TTL response:

TSPs make full efforts to provide a resolution to the billing/charging complaints registered by the customers as per their Turnaround Time. However, due to unexpected reasons delays have been observed in providing resolutions. TRAI may further look at making the parameter 98% within 4 weeks instead of 100% & 100% within 5 weeks.

Question 6:

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.

TTL Response:

The parameter needs to be reviewed as this parameter has come up as at times the credit/ waiver adjustment cannot be applied within one week as due to internal approval process depending on the various reason and slabs of credit to be processed, the same gets delayed.

Resolution timelines should not be standard across all categories and instead it should be aligned with the billing frequency of the account. This implies that the customer’s billing complaint should be resolved before the next billing cycle.

Question 7:

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.



TTL Response:

All TSPs have set up mechanisms to address the need and demands of their customers and to provide them with a good quality of service experience. They ensure that the accessibility to customers care is easy and effective. TSPs also try and ensure that the resources in the call centre are augmented as per the desired needs and requirements (e.g. during a product launch, network downtime, etc.). However, still there could be times when there is a delay in attending to the customer's call due to certain challenges not in the control of TSPs like natural calamities, bandhs etc.

With the number of self-help options available to customer, calling the call centre itself should be discouraged as the operator would have spent significant expenses in doing so. The parameter also needs to be based on time of the year and other specific challenges including, power cuts or heavy rains affecting resolution. These are not so desirable expectations unnecessarily leading to heavy costs in the call centre domain.

Hence, this parameter needs to be 90 – 120 Seconds as there are exigencies that are not always in the hands of the Operator or there are situations where maintaining the same in 60 Seconds leads to prohibitive costs

We therefore request that this parameter to be relaxed to 90 or 120 Seconds instead of 60 seconds as is suggested.

Question 8:

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.

TTL Response:

On receiving a customer's request for Termination/Closure of service; TSPs make some efforts to retain their customers as per retention policy. Though TSPs make efforts during the 7 day period but at times there could be a delay in connecting with the customer and internal strategic decisions.

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

Telecom Regulatory Authority of India

(IS / ISO 9001:2008 Certified Organisation)

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For TRAI