

VTL/Reg/TRAI/1406/4092
June 11, 2014

Shri A. Robert J. Ravi,
Advisor (CA&QoS),
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi — 110 002

Subject: VTL Response on Consultation Paper on “Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services”

Ref: TRAI Consultation Paper No. 04/2014 dated 21st May, 2014

Respected Sir:

This is with reference to TRAI's consultation Paper “Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services” dated 21st May, 2014

In this regard, we hereby enclosed our response to the above mentioned consultation paper. As desired, the response has also been sent at email id: advqos@trai.gov.in.

We hope that Authority will take our inputs for consideration.

This is for your information and records please.

Kind Regards



Meena Bisht
Regulatory Affairs
Mobile #: 9310225538

Encl: as above

Telephone Number: + 91 22 22886399, Fax Number: + 91 22 22886797
Corporate Identification Number (CIN): U72900MH2007PLC204763



Videocon Telecommunications Ltd

Response to the TRAI Consultation Paper on “Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services”

Videocon Telecommunications Limited welcomes the opportunity provided by the Authority to respond to the issues related to the standards of the Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services”.

We would like to submit that the level of regulatory intervention with respect to QoS should dependent on the degree of competitiveness that is present in the market. There is strong competitive pressure on service providers to attract new customers and retain existing customers and same has resulted in concerted efforts by most service providers to continuously improve the quality of service. There is a continuous flow of investment in the network and a key element of service provider’s strategies for improving service quality.

The continuous expansion of network coverage, improving the call handling capacity and network upgrades is improving service quality. There is an improving trend of better voice quality, higher call-completion rates and fewer call drops. In the existing market there is no evidence that the competition in market is failing especially in the mobile sector requiring continued existence of excessively regulated QoS obligations.

To the contrary, there is evidence that the market is functioning well, there is strong competition in the sector, with many telephony providers offering services. In light of this, there is need to review the regulatory approach to deal with the QoS issues. In our opinion, we strongly recommend that Authority should restrict itself to monitoring of the QoS and keeping in mind unfavorable operating environment and other issues which are impacting operations and QoS KPIs, it is recommended that present benchmarks for QOS KPI’s should be relaxed.

Kindly find below our response to the queries raised by the Authority in the Consultation Paper.

VTL Response to the queries raised by TRAI in this consultation paper

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.

Videocon Telecommunications Ltd

Answer: There is very little control of TSPs in the faults on account of damage to the cables. There are other practical issues such as cables being stolen, faults due to heavy wind, rain, etc. Hence in light of the above, we suggest that this benchmark be relaxed and modified to $\leq 10\%$.

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.

Answer: As suggested in Q 1, if the numbers affected due to cable faults are monitored separately, there is no need to revise the benchmark. If not, then for urban areas it should be within 3-5 working days and definitely for Rural areas benchmark parameter should be "Fault repair within 7 working days".

Question 3: What are your views on relaxing the benchmark for parameter "Mean Time to Repair (MTTR) to ≤ 12 Hrs" for Basic Telephone Service? Please give your comments with justification.

Answer: As mentioned above due to situations which are beyond control of TSPs i.e. frequent Fiber cut causing outages, due to expansion of the National Highways. No electricity supply in most of the Rural towns for 2-18 hrs in most circles due to poor infrastructure. This has an adverse effect on the quality of the network & degrades the QoS. Hence there should be relaxation to ≤ 12 Hrs in the benchmark.

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.

Answer: These parameters can be removed from reporting compliance since it is no more an issue and all operators are meeting the benchmark and should be monitored by the authority from time to time.

Question 5: In your view, does the benchmark for parameter "Resolution of billing/charging complaints" within 4 weeks for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.

Answer: The suggestion of TSPs has some merit as achieving 100% in 4 weeks genuinely becomes a problem in few difficult cases. Hence, 98% in 4 weeks and 100% in 8 weeks seems to be more reasonable.



Videocon Telecommunications Ltd

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.

Answer: We fully agree that due to some unforeseen reasons and external factors, TSPs are not able to resolve the issues within benchmark prescribed by the Authority. Hence authority is requested to consider revision of benchmark to 95% in one week and 100% in two weeks.

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.

Answer: To serve customer better, TSPs from time to time puts lots of efforts to improve infrastructure, manpower, customer awareness schemes, updated VAS are introduced in a call centre regularly due to the exponential growth of subscribers. Despite of all these efforts still many TSPs are not able to meet the benchmark. Hence, It is recommended to increase the period allowed to answer the calls from 60 sec. to 90 sec.

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.

Answer: Every TSPs put their 100% efforts to retain customer by providing discounts, new plans etc. and time is required by customer to experience the new plans before giving final consent for closure of service. Hence, achieving 100% in 7 days becomes. Authority is requested to relax the benchmark to 95% in 7 days and 100% in 15 days.