

Comments on Issues for consultation:

Ans. to Q. No. 1) The decision of imposing financial disincentives for delay in submitting audit reports of the metering and billing system will be a right decision and the proposed rate of Rs. 50,000/- per day may also be increased, as it would bound the service providers to submit the CDRs just on time to get rid of paying a huge amount of penalty.

Ans. to Q. No. 2) Regarding the step of imposing financial disincentives Rs.50,000/- & Rs.10,00000 respectively for delayed submission of ATRs and incomplete or false report to TRAI by the service providers, it may be considered a perfect way to make the service providers to submit the same in proper time frame. In this way they will be always under pressure to submit the reports within the prescribed time frame fixed by TRAI.

Ans. to Q. No.3) Regarding the proposal for audit of the CDRs for at least twice a year, my opinion is that it reveal the real picture as how the service providers are violating the rules of charging their telecom consumers by overcharging them or non refund of overcharged amount to their consumers. The monthly progress report from the auditor will also give us a clear picture of action taken by the service providers on such observation of overcharging.

Ans. to Q. No. 4) The proposal of financial disincentives equivalent to the amount overcharged in case of non refund of overcharged amount within one month of the audit observation will certainly ensure the timely refund of overcharged amount to the affected customers.

Ans. to Q. No.5)As written in para 2.9 of Consultation Paper the proposed step to stop the problem regarding submission of incomplete or inadequate comments by service providers, by making it mandatory to give detail information about the date of occurrence / rectification of the problem, number of customers affected and refunds made and imposing of financial disincentives of Rs.10 lakhs against each incomplete or inadequate comments in the audit reports or the ATRs, I think this would be a perfect way to compel the service providers to produce full details along with their audit reports or ATRs.

Ans. to Q.No.6) Yes I fully support nomination of auditor by TRAI and appointment of the nominated auditor auditor by the service providers as this process will bring out quality audit reports because such auditors will not be under any influence of the service providers and as result actual facts & figures will be reflected in their audit reports.

Ans. to Q. No.7)Regarding the proposal for fixing of remuneration of auditor by TRAI, my view is that this system will ensure quality audit from the auditor's end as because there will be no issue of low bidder auditor. The quantum and methodology for computation of audit fees, in case that has to be fixed by TRAI can be laid down after due consultation with the empanelled auditors.

Ans. to Q. No. 8) Regarding the proposals relating to tariff plans to be covered for audit as mentioned in the para 2.13 of the consultation paper, I have the same view as described therein.