

Comments on
Consultation Paper
On
Review of The Quality of Service
(Code of Practice for Metering & Billing Accuracy)
Regulations , 2006

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Delay in Submission of Audit Reports

Sr. No.	Issue	Our Comments
Q.1	What are your views on imposing financial disincentives for delay in submitting audit reports of the metering and billing system and what should be the quantum of such financial disincentives? Please give your comments with justification.	In case there is an abnormal delay by Service Provider (SP) despite several reminders penalty may be levied. Quantum may be determined by TRAI.

Delay in Submission of Audit Reports

Sr. No.	Issue	Our Comments
Q. 2	What are your views on imposing financial disincentives for delay in submission of Action Taken Reports on audit observations of the metering and billing system and for providing false information or incomplete information and what should be the quantum of such financial disincentives? Please give your comments with justification.	<p>In case there is an abnormal delay by Service Provider despite several reminders penalty may be levied. Quantum may be determined by TRAI.</p> <p>Larger Punitive actions may be, prescribed for furnishing false information.</p>

Non refund of overcharged amount to affected customers

Sr. No.	Issue	Our Comments
Q. 3	What are your views on the proposal for audit of the CDRs for at least twice a year- three months CDR pertaining to first half year and three months CDR pertaining to second half year? Please give your comments with justification.	<p>Current Process is adequate.</p> <p>Additionally, we suggest as follows:</p> <p>Specific report of Auditor to be submitted for each of Root Cause Analysis (RCA) carried out by Service Provider confirming :</p> <ol style="list-style-type: none"> 1. All the affected customers are identified by running a script on appropriate database . 2. Account of the subscribers are credited (sample check) with the refund as stated by Service Provider.

Non refund of overcharged amount to affected customers

Sr. No.	Issue	Our Comments
Q . 4	What are your views on the proposal for simultaneous reporting of instances of overcharging to TRAI by the auditor. Monthly progress report on the action taken by service providers on such audit observations and financial disincentives on delayed refund of such overcharged amounts? Please give your comments with justification.	<p>Simultaneous reporting to TRAI of actions as may be decided in RCA done by SP irrespective of who has detected the overcharging to be introduced .</p> <p>Instead of monthly reporting this may be made part of the ATR to be submitted by SP on 30th September.</p>

Incomplete or inadequate comments by Service Providers

Sr. No.	Issue	Our Comments
Q. 5	Do you support mandating service providers to undertake a thorough analysis of each audit observations and the requirement to furnish a detailed comment on each audit observation, as proposed above, including financial disincentives for submitting audit reports without adequate comments? Please give your comments with justification.	The report needs to be countersigned by the SP.

Quality of Audit Report

Sr. No.	Issue	Our Comments
Q. 6	Do you support nomination of auditor by TRAI and appointment of the nominated auditor by the service provider? Please give your comments with justification.	<p>Current Process is adequate.</p> <p>Process of rating of Auditors based on the reports submitted to be put in place and Auditors with higher rating above a predefined cut off should be allowed to be appointed by A category SP.</p> <p>Note : This will also act as incentive to rest also to scale up on quality.</p>

Quality of Audit Report

Sr. No.	Issue	Our Comments
Q. 7	What are your views on the proposal for fixing of remuneration of auditor by TRAI and what should be the quantum and methodology for computation of audit fees, in case the same is to be fixed by TRAI? Please give your comments with justification.	<p>The base fees may be fixed by TRAI say at a reasonable level. The suggested model may be as under</p> <ol style="list-style-type: none">1. Rs. 1 Lac per Service area per circle per report in case CDR verifications are to be done once in a year.2. Rs. 1.50 Lac per Service area per circle per report in case CDR verifications are to be done twice in a year.

Audit of Tariff Plans

Sr. No.	Issue	Our Comments
Q. 8	What are your views on the proposals relating to tariff plans to be covered for audit? Please give your comments with justification.	<p><u>Rating</u> Instead of CDRs for the plan selected, Sample CDRs All changes related to rating of calls in the billing system due to service provisioning , migration of system or change in the plan needs to be selected.</p> <p><u>Intimation of tariff</u> All plans that are not offered to public at large may be excluded.</p>