

**QTL's Response to the TRAI's Consultation Paper No.03/2014, Dtd. 21<sup>st</sup> May, 2014 on 'Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services' (Amendment to the Standards of Quality of Service for Wireless Data Services Regulations, 2012)**

QTL welcomes TRAI's initiative to revise the existing QoS Benchmarks by considering the practical and genuine difficulties faced by the TSPs in maintaining the wire line networks. The QoS benchmarks prescribed for the wire line are so stringent that it can't be met in spite of 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 depletion of demand the QoS benchmarks needs to be revised and the **financial disincentives should be dispensed with on QoS parameters.**

QTL'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:-

**Q1. 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.**

**QTL Comments:**

- a) Although QTL puts its best efforts to meet the prescribed benchmark targets but inspite of best efforts there are certain possibilities of increase in the fault rate in the Monsoon Season due to rains and flooding which causes increase of underground cable faults.
- b) There are certain other reasons such as under ground cables being cut or stolen or there are certain road widening or development works carried by the local civic authorities which result in generation of more faults and are beyond the control of the service providers.

**QTL Recommendation:**

Therefore, in view of the above mentioned practical facts inherent in the wireline networks the prescribed benchmark may be revised to <10%.

**Q2. 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.**

**QTL Comments:**

Faults booked after 5 PM are actually attended on the next working day after 10AM and if there could be any underground fault then it is not possible to

attend the fault within the next working day. Faults in the underground cables, HDD cuts, public disputes, road widening and natural calamities like flooding/storms etc make it impossible even to repair the fault next working day even.

**QTL Recommends:**

QTL recommends that the QOS bench mark of;

- i) "Fault Repair Next Working Day" be changed to 70%.
- (ii) "Within Three days to 80%"
- (iii) "Within Five Days to 90%"
- (iv) "Within Seven Days to 100%"

**Q3. 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.**

**QTL Comments:**

QTL provides the basic services (wireline) is mostly provided through underground cables and overhead drop wires criss crossing the streets. We face multiple issues while maintaining the wireline network/services provisioned for their customers. Some of the problems and reasons are stated below:

- a) Underground cables damaged due to development work undertaken by various civic agencies.
- b) Cases of theft related to underground and duct cables or cases where the old underground cable has got corroded due to ageing.
- c) Delay in restoration in certain congested areas in cities where public damages the junction boxes and does not allow aerial cables and drop wires to be routed near their premises and many a times it becomes a law & order issue.

**QTL Recommendation:**

Therefore QTL recommends the MTTR may be revised to average <12hrs which will take care of the extra ordinary natural circumstances like heavy rains /flooding or storms etc. Besides the normal operational hazards faced for maintaining the wireline networks.

**Q4. 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.**

**QTL Recommendation:**

Since, the values of ASR provides an indication of Quality of Service provided by the switching system, hence, it is felt that ASR should be part of compliance reporting for checking the QoS of TSPs. However, in case of any non compliance, no financial disincentive should be levied on the TSP.

**Q5. 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.**

**QTL Comments:**

QTL believe that sometimes there are certain unforeseen circumstances all the billing/charging disputes can't be resolved within 4 weeks.

**QTL Recommends:**

Therefore it is recommended that the existing benchmark of 100% resolution of such cases be relaxed to :

- (i) 98% within 4 weeks and
- (ii) 100% within 8 weeks.

**Q6. 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.**

**QTL Comments:**

There are certain cases when it may not be possible to provide credit/adjustments to the customer account in full 100% of the cases within one week of resolution of the complaint. As it is a fact that certain internal processes in the organisation takes certain time to provide the credit / adjustments after verification of the customer data.

**QTL Recommendation:**

Hence we recommend this parameter may be relaxed to 95% within one week and 100% within two weeks of resolution of the complaint.

**Q7. 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.**

**QTL Comments:**

QTL has set up mechanisms to address the need and demands of its customers and endeavour to provide them with a good quality experience. We do ensure that the accessibility to customer care is easy and effective. QTL always ensures that the resources in the call centre are augmented as per the needs and requirements (e.g. during a product launch, network downtime). However, still there could be times where there is a delay in attending to the customer’s call due to certain outages due to various reasons like cable cuts/monsoon season/thunderstorms/flooding etc. Besides that, various other modes of logging complaints on the website are also provided to supplement the call centre.

**QTL Recommends:**

Calls answered from voice to voice be revised within 60 seconds to 60%

**Q8. 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.**

**QTL Comments:**

We support the view of revising the said parameter considering the challenges faced by TSPs in meeting the existing benchmark for various reasons viz. Delayed recovery of Customer Premise Equipment (CPE) due to customer convenience & availability and customer retention efforts.

**QTL Recommends:**

We therefore request that this parameter be relaxed to

- (i) 95% within 7 days of registration of request for closure of service
- (ii) 100% within 21 days.

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