



**Vodafone's counter comments on the TRAI Consultation Paper on Complaints/ Grievance Redressal in the Telecom Sector dated 28 July 2016**

1. At the outset, we would like to reiterate that we appreciate the Authority's intention and objective by proposing a consultation paper to seek views, opinions and comments for possible options/alternatives from the TSPs.
2. We would like to submit that it's our constant endeavour to ensure the Quality of Service norms as laid down by the Authority to meet the enhanced levels of customer satisfaction.
3. Further, regular audits and surveys are also conducted by the Authority so as to protect the interest of the consumer. The Authority has also specified the performance benchmarks for Customer Service and QoS parameters and operators failing to meet these benchmarks are liable to pay financial disincentives.
4. You would appreciate that apart from the consumer education workshops mandated by the Authority; we have been taking various other initiatives and conducting many activities in order to meet our customers at through various formats at regular intervals. These initiatives and activities help us to establish a direct contact with our customers and understand the concerns faced by them and resolve the same accordingly.
5. Social media has also made it very convenient for the consumer to raise his issue to the service provider. A regular check is also kept on all these platforms like Facebook, Twitter and various other blogging sites to engage with the consumers, take their feedback and address the concerns, if any, faced by them.
6. Further, the intense competition in the market, coupled with the facility of MNP also put pressure on any service provider to put in all efforts address consumer concerns and ensure consumer satisfaction.
7. Unlike the Electricity, Insurance and Banking sectors, the telecom sector has a robust, two tier Complaint Redressal mechanism as prescribed by the Authority; further, the amounts involved in all the telecom sector are far lower; hence the present grievance redressal mechanism should be continued and there is no need of Ombudsman in telecom sector.
8. Further, legal remedy is the option which is always open to the consumer, in case he is not satisfied with the resolution provided by the service provider and /or Appellate Authority.

In the backdrop of our above submissions, we would like to make the below counter on the comments of certain stakeholders on Consultation Paper:-



**1. Some of the stakeholders have suggested that Ombudsman should be introduced as an additional layer**

- a. It is first submitted that Ombudsman essentially means introduction of an External Member for resolving the consumer complaints. In the existing system, the same role is being played by the CAG Member who is the part of the two Member Advisory Committee for resolving the appeals. Therefore, the consumer rights are very well protected in the existing system.
- b. Further, the establishment of an Office of Telecom Ombudsman would mean the dismantling of the well-defined multi layered existing system, which is not desirable.
- c. Creating an additional layer would also not be desirable as it would lead to duplication of fora – adding to complexities and making the system less efficient. It may not be out of place to point out that the earlier 3-tier redressal system was brought down to two-tiers to make the redressal system more expeditious and efficient.

**2. Some of the stakeholders have stated that the Complaint Redressal system is not simple, transparent, easily accessible and user friendly**

- a. It is submitted that the current system of Complaint Redressal is as per the Authority's guidelines which enables-
  - i. Consumers to contact the Complaint Centre via various modes like call centres, Stores, via web-chat, website and e-mail. Separate helpline number is available for handling UCC complaints.
  - ii. A docket number is assigned to each complaint and the time required for resolution of the complaint is also informed to the consumer (as mentioned in the QoS Regulation).
  - iii. On resolution of the complaint, consumer is informed regarding the final status and also given an option to file an appeal, in case he is not satisfied with the resolution.
  - iv. As stated above, one of the Member of the Advisory Committee, which takes action on the appeal, is an External Person, who belongs to the Consumer Advocacy Group registered with the Authority, and therefore the rights of the consumer are also well protected while taking any decision.
  - v. Further, there are well defined time limits for resolution of complaints on the basis of the type and nature of the complaint as well as for an appeal.



- b. Further, every service provider has launched the Apps via which a consumer can check the details of his accounts and activate/deactivate services, pay bills, recharge, check balance etc in a very simple manner.
  - c. Notwithstanding the above, we believe that if there are specific suggestions that can further improve the existing system, they may be considered by the Authority.
3. **Some of the stakeholders have suggested that the Ombudsman should be like Banking sector and should have the powers of passing penal orders.**
- a. We would like to submit that the Authority has already laid down the standards of QoS parameters such as Metering and Billing Credibility, Resolution of Billing and Charging related complaints, response time to the customers for assistance etc. Any service provider who fails to meet these benchmarks are subjected to financial disincentives.
  - b. Regular audits and surveys are also done by the Authority as well as Authority empanelled auditors to keep a check on the customer complaints and action taken report is also submitted against the observations shared by the Auditors.
  - c. Further, we would like to reiterate that the Banking sector does not have a grievance redressal mechanism like the telecom sector. Also, the individual amounts involved in case of Banking sectors are very high as compared to the telecom sector, where most of the complaints are resolved at the complaint centre level by provider waivers/reversals as service gestures.
4. In reference to the specific issues raised by one of the stakeholders in regards to the Complaint Redressal mechanism of Vodafone, we would like to submit that the complaints raised by the customer (including the appeals) were addressed as per the TRAI's Complaint Redressal mechanism. Customer has raised certain further queries, for which we are in contact with the customer.

**New Delhi**  
**16 September 2016**