



Dated: 21<sup>st</sup> Sep, 2015

No: Regln/1-36/2015/1984

To,  
The Advisor (F&EA),  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg,  
(Old Minto Road), New Delhi-02

{Kind Attn: Smt. Vinod Kotwal}

Sir,

Sub: - Comments on Consultation paper on "Compensation to the Consumers in the Event of Dropped Calls".

Kindly refer to your office press release dated 4<sup>th</sup> Sep, 2015 vide which a Consultation paper on "Compensation to the Consumers in the Event of Dropped Calls" was released for inputs/ comments from the stakeholders.

In this context, kindly find herewith the BSNL comments on the above mentioned consultation paper:

**Q1:** Do you agree that calling consumers should not be charged for a call that got dropped within five seconds? In addition, if the call gets dropped any time after five seconds, the last pulse of the call (minute/second) which got dropped, should not be charged. Please support your viewpoint with reasons along with the methodologies for implementation.

&

**Q2:** Do you agree that calling consumer should also be compensated for call drops by the access service providers? If yes, which of the following methods would be appropriate for compensating the consumers upon call drop:

- (i) Credit of talk-time in minutes/ seconds
- (ii) Credit of talk-time in monetary terms
- (iii) Any other method you may like to suggest

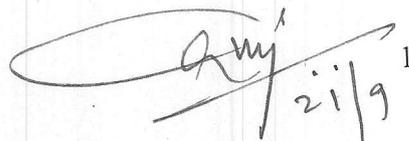
Please support your viewpoint with reasons along with the methodologies for implementation.

**BSNL Reply:** We do not agree. The reasons for the same are as under:-

- (a) By the very nature of mobile network, call drops are bound to happen or bound to occur and precisely for this reason the TRAI too has accepted a call drop upto 2% of the total calls. However, the call drops occur for many reasons which can primarily be classified under the following:-

- (i) In a typical case of BSNL, it has more than 60 per cent of the calls originated are, meant for other operators and as such for any reasons which are attributable to the other operators resulting in the call getting dropped, would also figure in the BSNL QoS performance. Networks of various TSPs do not operate in isolation but operate as a single giant 'network of networks'.

Continued on page 2

  
21/9

(ii) Ill informed radiation fear has resulted in negative perception related to radiation hazard due to mobile towers amongst general public. Due to this TSPs are not getting tower permission by RWA/Municipal Authorities. Apart from these, due to Court Order/local administrative bodies, TSPs have been forced to shut down even the existing towers which has formed dark spots, resulting in call drops.

(iii) Certain events leads to call drop which can be attributed to subscriber reasons such as the subscriber/customer moves into basement, moves into remote/rural areas where the coverage is inadequate, moves into tunnel or dark spots which can not be covered in the normal course, battery of the customer goes off or disconnecting call due to wrong number dialed.

(iv) Majority of BSNL customers are on per second plan so as such there is no financial loss in billing to customer in the event of call drop.

(v) Technically it is not feasible (as of now) to identify and give credit for call drop cases irrespective of their tariffs. It is pertinent to mention here that the world body 3GPP whose specifications are used by various TSPs for implementing their GSM network, does not specify any correlation whether any such short duration calls or other such calls gets credited in the event of call drop.

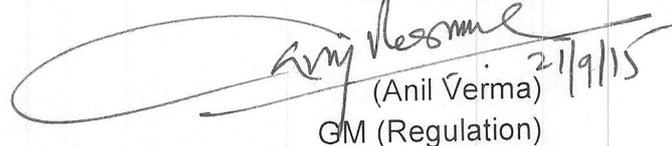
**Q3:** If the answer to the Q2 is in the affirmative, suggest conditions/limits, if any, which should be imposed upon the provision of crediting talk-time upon call drop and usage thereof.

**BSNL Reply:** Not applicable, in view of combined reply of Q 1 and Q 2 as above.

**Q4:** Is there any other relevant issue which should be considered in the present consultation on the issue of call drops?

**BSNL Reply:** In view of technical non-feasibility of identifying the exact reasons for call drop for every call completion event, the mobile system in the present form do not support implementation of compensation for call drop. As such any such move by TRAI would require a detailed technical examination and thus may require extra CAPEX/OPEX investment by TSPs for such implementation.

Yours sincerely

  
(Anil Verma) 21/9/15  
GM (Regulation)