

S. No.	Para number of Draft Notification	Input/Comment/Counter-Comment	Justification with supporting reference, if any
1	Para No. 6 (b) (X) of Page 9	MTTR benchmark is mentioned as ≤ 10 Hours. The calculation of MTTR shall be based on Working hour duration starts from 08.00 Hours and up to 18.00 Hours. This should also exclude the week end and Holidays. However, for major faults during non-working hours, there is the provision of declaring SNO.	As for Example, a fault to a customer at his/her access network may occur at 25 th January or 14 th August evening and it would take more than 24 hours to restore it as the next day falls under national Holiday. Therefore, the MTTR calculation for this extant case shall be more than 10 Hours and will affect the entire MTTR parameter.
2	Para No. 6 (b) (XI) of Page 9	For reporting of SNO to the Authority, a specific Email ID (under trai.gov.in domain) and Phone No. may be published (Or may linked with the TRAI QoS server, if any) so that the SPs may reach to this particular no./email ID/server of TRAI on everyday at any time irrespective of weekend or holiday.	The recording of SNO thus obtained through TRAI Email ID/TRAI server/Phone No. may be recorded in a designated TRAI server which can later be sync with the performance Monitoring Report of the SPs during validation of their monthly/Quarterly report. During PMR audit, the SNO details thus recorded by the SPs may be brought under consideration.
3	Para No. 6 (b) (XI) of Page 9	The methodology to determine the complete loss of service by 10% of subscriber in a service area or material degradation of service is not mentioned in the notification.	For an Example in a LSA, there may be a scattered possibility of loss of service or material degradation at different districts or geographical area of that particular LSA at a specific duration of time which may collectively reach to more than 10%. In that case whether, the entire LSA will be declared under SNO in case of Wired Broadband service degradation?
4	Para no. 14 (c) of page 15	All the SPs shall ensure the complaint registration facility to be accessible to subscribers simultaneously through 'SP Mobile APP', IVRS, Chat Bot and definitely through Call centre. In case of dialing to IVRS,	Though mentioned in QoS regulation but in most of the cases, the customer do not able to reach or call the SP's customer care representatives.

		there shall be the provision/ option of reaching the customer executive of the SPs call centre.	
5	Para 14 (j) of page 21	During calculation of Silence call rate, the calls generated by the spammers may be excluded.	The spammers use silent call or silent robo calls are drastically increased. So the identification of spam calls and its corresponding silent calls may be discarded.

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