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**भारत संचार निगम लिमिटेड**  
(भारत सरकार का उपक्रम)  
**BHARAT SANCHAR NIGAM LIMITED**  
(A Govt. of India Enterprise)

**No:** BSNLCO-RGLN/29/9/2020-REGLN dated 27.10.2020

**To,**

Advisor (QoS),  
Telecom Regulatory Authority of India (TRAI),  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg, (Old Minto Road)  
New Delhi – 110002

{Kind attention: Shri Asit Kadyan}

**Sub:** Consultation Paper on Review of “The Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006”

**Sir,**

Please find below the BSNL comments on Consultation Paper on Review of “The Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006”:

**Q.1:** What changes are suggested in the sampling methodology in order to make it more representative of the post-paid and prepaid user segments or different types of tariff plans? Should the full spectrum of tariff plans be subject to audit? What considerations are required to be taken to address the issues or concerns related to the incidences of wrong charging specially in case of data packs, STVs, multiple tariff packs at a time, etc.? Please give your views with detailed justification.

**BSNL Comments:**

Basic (Wireline) services:

In respect of fixed line network, most of the customers are having postpaid plans. Hence the existing sampling methodology is adequate. The plans only with higher subscriber base should be audited.

Cellular Mobile Telecom services:

**Postpaid:** The customer base of postpaid users is very small. There are limited tariff plans on offer. The count of all the plans is shared with the auditor, based on that the sample plans are selected for audit. This existing sampling method seems to be appropriate.

For the postpaid segment, inactive plans (not being currently offered to new customers) may also be brought into the scope of audit provided they are representing at least 5% of the total customer base in that segment.

**Prepaid:** Approximately 95% customers are in Prepaid segment and most of them are using STVs offering a fixed data limit such as 1Gb/2Gb/3Gb per day and unlimited voice calls. Sample may be taken from most popular STVs.

The current methodology is adequate and may be followed for audit of various tariff plans for both kind of services. The full spectrum of tariff plans should not be included in audit scope; there may be many inactive plans with customers still holding on; only the popular plans with larger subscription base should be subject to audit. The sole criterion for sampling of tariff plans for audit should to verify the actual delivery vis-a-vis offered features/ Values of plan as advertised/ promised.

In case of FUPs, whether original charge rates have been applied post period of FUP needs to be checked. In case of multiple plans applicable at a time (in one bill – due to plan changes) whether proportion of charges and freebies are accounted for properly.

**Q.2:** How IT tools and new technologies can be used to adopt preventive and proactive ways to avoid occurrences of error in charging or wrong configurations leading to charging? Whether the IT capabilities of other systems available with the service provider may be made available to the auditor for audit purposes? How such tools developed for rigorous testing before launch of new tariff plans can also be used for audit purposes? Please give your views with detailed justification.

**BSNL Comments:**

Various IT tools and new technologies are being used by TSPs for checking and configuring the new plans. The Recharge Simulator script is being used at present by IN team after launching any new plan/ STV/offers to check if the customer is getting the correct benefits.

The details can be gathered from the service providers of all the new plans configured during the year and sample bills can be taken of the plans to check. The CDRs for such Sample Plans and STVs may be checked by the auditors in IT software tools only, because raw data is too large to be viewed and checked.

BSNL has also deployed Fraud Management and Revenue Assurance software tools. FMCC & RA system has tariff and rating modules where tariff plans are being tested. The Auditor can use these tools to check rating of CDRs and tariff plans.

**Q.3:** With the evolution of new technologies and mediums to provide information related to terms and conditions, tariff details to the customers at the time of subscriptions or making it available as and when required by the customers, what changes are required to assess delivery of information in timely and appropriate manner? Please give your views with detailed justification.

**BSNL Comments:**

The tariff details are being provided to the customers at the time of subscriptions. BSNL has provided various other communication channels to the customer to know about tariff details. The customer may query through USSD message, IVR system, customer care agents, help lines etc. The details are also available online through website. BSNL has made available a self-care portal to its customers to access the required information at any time.

“MyBSNL” App provided to the customer is the most convenient method to access complete information and access various facilities/services provided to the customer.

Moreover, BSNL is already complying with the Directions issued by TRAI on tariff publications and advertisements. The tariffs are also available on TRAI website. There are sufficient sources available for customer information.

**Q.4:** What IT-enabled measures need to be considered to ensure consistency of the tariff information across the different channels or mediums? Please give your views with detailed justification.

**BSNL Comments:**

The master database of all tariff plans can be created and updated centrally. The consistency of the tariff information across the different channels or mediums can be ensured if mechanism for mirror imaging of data from central database is created in various channels/ mediums.

**Q.5:** What changes are suggested in handling of billing complaints? Whether defining what constitutes billing complaint may help in bringing uniformity? Whether higher frequency of audit of complaint handling would help in improving effectiveness of complaint redressal mechanism? Please give your views with detailed justification.

**BSNL Comments:**

Genuine Billing complaints are very rare in BSNL. Most of the complaints received from customers are found to be invalid. Moreover, there is already an effective procedure in place to mitigate subscriber complaints.

Higher frequency of audit of billing complaints may not be a help as TSPs are already sensitive towards customer’s grievances. At this time of fierce competition, no operator can afford to lose its customers by ignoring the billing complaints.

**Q.6:** To conduct special or peer audit, where old records might be required to carry out the audit, what may be prescribed to ensure that the relevant details are maintained for sufficiently long period and made available to the auditor in a timely manner for conducting the audit? Please give your views with detailed justification.

**BSNL Comments:**

The existing procedure may be continued. New plans keep on coming very frequently, accordingly there are rapid changes take place, therefore, comparing historical data will not be required.

**Q.7:** Should the Regulation 6C, Regulation 6D and Regulation 6E of the regulations dealing with consequence for failure of the service providers to submit audit report and action taken report, consequence for failure of the service providers to refund overcharged amounts to customers and consequence for failure to provide comments on audit observations in the Action taken report respectively be retained as it is or they need to be altered/strengthened. Pl support your views with rationale.

**BSNL Comments:**

These Regulations and their consequences must be retained for proper check and balance on the service providers.

**Q.8:** Any other issues which are relevant to this subject.

**BSNL Comments:**

**No such issues.**

Yours faithfully



26.10.2020  
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