

5.1. What should be the benchmark for the parameter —Provision of a landline Telephone after registration of demand? (Reference Para 2.11)

And

5.2. Do you agree that parameter —Provision of a landline Telephone after registration of demand|| may be removed from the list of parameters requiring mandatory compliance to the Authority? (Reference Para 2.11)

Bharti Airtel Response:

We believe that the current benchmark of 7 days should be retained, however the said parameter may be removed from the list of the mandatory compliance.

5.3. Do you suggest any changes to the benchmark for the parameter for landline fault repair, including rent rebate for delay in rectification of fault? If so, please provide details. (Reference Para 2.16)

Bharti Airtel Response:

- We believe that existing benchmark of <5 faults per 100 subscribers should be retained. However, this should exclude the faults occurring due to various force-majeure like cable cuts, flood, fire , Sabotage , strikes , lockouts , right of way (ROW) due to Govt & private agency not permitting to rectify the cable faults etc as it is not in control of the operator and some times Government agencies do not permit us to rectify the fault till the work is completed. Also the network is severely affected due to uncoordinated civil work by various agencies – NHAI, PWD, Municipal Corp., Electricity Boards , Public Health Engineering , Jal Boards , Forests, etc & damage the network .
- Ex : Recently at Delhi due to commonwealth games & beautification work ,the copper network in Connaught place , Pharganj , area got damage multiple time due to digging activities by NDMC . The authorities have removed all DPs from the building & due to which complete new network has to be laid to serve the customer . Similarly in MPCG ,network got severely damaged due to road widening activity at Indore, Bilaspur , Raipur & Bhilai . In same way due to Tamil conference at Coimbatore the authorities have not permitted to dig & rectify the cable fault arising out of road widening work for approximate period of one month
- The rent rebate for complaint falling under this category should be excluded ."

5.4. What framework do you suggest to ensure payment/adjustment of rebate for prolonged landline phone fault as per QoS regulations? (Reference Para 2.16)

And

5.5. How do you propose to ensure its effectiveness? (Reference Para 2.16)

It is recommended that the existing benchmark takes care of the consumer interest and should be continued with.

5.6. Do you propose any changes to the existing provisions relating to shift of a landline telephone connection? (Reference Para 2.18)

Bharti Airtel Response:

'We recommend changing the definition of 3 days as working days also if the customer request for shifting as per his availability (beyond three days) then the date of customer request should be taken for reporting purpose''

5.7. Do you suggest any change in existing provisions to ensure timely termination of service/closure? If so, please provide details. (Reference Para 2.22)

AND

5.8. Do you agree with the suggestions for seeking explicit consent of the customer, in writing or SMS or e-mail or FAX, to continue with the service, once a request has been made for termination of service? (Reference Para 2.22)

Bharti Airtel Response:

- We believe that the existing provisions with regard to timely termination of service/closure of service of not more than 7 days should be continued with and the same should be from the day of receipt of complaint at one of the defined touch points. However, in case of Corporate / Bulk accounts exception should be allowed. Since such accounts are large customer-base accounts and often the billing and other service activities are spread over different billing cycles/geographies/departments. Further, negotiations of retention packages etc. usually take greater than 7 days. Hence we propose timeline of total 14 working days for the termination of service.
- In the absence of contact with the customer during the specified period, the process of termination will continue uninterrupted and the 7 days timeline will stand.
- We also recommend changing the definition of 7 days as working days instead of calendar days. Due to the timeline of 7 days, we have been forced to outcall/ seek appointment from the customer on all days including Sundays & other holidays, which act as an irritant to the customer. In most of the cases, Customer asked us to contact on working day only. Further, as can be seen from International practices section of the consultation paper, in countries like Malaysia, Canada, SLA has been defined as "Business days" in various parameters pertaining to Quality of Service.
- Also the target to achieve disconnection within 7 days is 100% which should be revised to 95% as even a single miss by the operator in an otherwise flawless performance will cause the service provider to be non compliant. This often causes a misrepresentation/misconception about the service provider's compliance. For rest of the 5% requests, we propose additional 7 working days for the closure.

- Yes, we agree with Authority's suggestions for seeking explicit consent of the customer in writing or SMS or e-mail or FAX, to continue with the service. Further, in this regard, we wish to submit that alternatively voice records should also be allowed and such recorded consent can be retained for a defined period.

5.9. Do you agree with the time period of four weeks provided for resolution of billing/ charging complaints? If not, please suggest alternatives. (Reference Para 2.25)

AND

5.10. Do you agree with present provisions regarding period of one week for applying credit/waiver/adjustment to customer's account upon resolution of billing complaint?(Reference Para 2.28)

Bharti Airtel Response:

It is submitted that the existing provision of four weeks should be continued with.

Also it is proposed that the target to achieve resolution of complaints within specified days is 100% which should be revised to 95% as a single defect makes this parameter non-compliant. For the balance 5% resolution of complaints, we propose additional 2 weeks for the closure.

5.11. What should be the time period and terms and conditions for refund of deposits after closure/termination of service? (Reference Para 2.32)

5.12. What steps do you suggest for timely refund of deposits after closure/ termination of service? (Reference Para 2.32)

Bharti Airtel Response:

It is submitted that the existing provision of 60 days should be continued with, however, there may be a few exceptions to the above where it takes longer time in resolution viz:

- i) Corporate Customers
- ii) International Roaming etc. as TAPIN files are required from visited operator.

For closure of such cases, we propose timeline of 90 days from the date of disconnection.

- We have also inbuilt the following steps to ensure timely refunds of deposits to the customer:
 - ✓ Reconfirmation of cheque forwarding address before sending the same to the Customer. This will help Customers seeking disconnection due to change of City / Service area.
 - ✓ Bank account number to be taken at the time of termination of service request to do the Electronic fund transfer so that Customers get the credit of refund amount directly in their bank account.

5.13. Do you suggest any changes to the present benchmark of 15 days for the parameter —Service provisioning/ Activation Time? (Reference Para 2.34)

And

5.14. How the present provisions can be effectively implemented? (Reference Para 2.34)

Bharti Airtel Response:

The existing benchmark should be continued herewith.

5.15. Do you suggest any changes to present benchmark for the parameter —Fault Repair/ Restoration Time and provision for rebates? (Reference Para 2.36)

We believe that no change is required in the existing benchmarks.

5.16. Do you propose any change in the existing system of selection of tariff plans for the audit of metering and billing system of service providers to make whole exercise more effective? (Reference Para 2.40)

Bharti Airtel Response:

We believe that no change is required in the existing system of selection of tariff plans for the audit of metering and billing system of service providers.

5.17. What method of alert do you prefer for premium service calls (Call rates higher than normal local call charges rates) before such calls are put through? (Reference Para 2.42)

Bharti Airtel Response:

- We would like to submit that the charges for every premium VAS/commercial service are proactively informed to the customer during TV commercials, at hoardings/print advertisements & website and all other medium of communication (SMS broadcast / OBD) to help customer to make an informed choice.

5.18. What information in your view should be provided to prepaid subscribers immediately on completion of every call to facilitate him understand his usages and verify correctness of the deductions? (Reference Para 2.44)

Bharti Airtel Response:

In order to ensure complete transparency, all Airtel Prepaid Customers are already communicated the following after completion of every call –

- Amount deducted for the call,
- Balance amount in Customer's A/C,
- Validity period of the SIM.

In addition to this, we also provide sms based balance enquiry facility to the customers.

5.19. What information do you feel is necessary after recharging a prepaid connection to ensure complete value for money immediately after recharging/top up? (Reference Para 2.46)

Bharti Airtel Response:

- The details which should be provided are as follows:
 - ✓ Value credited to the subscriber
 - ✓ Tax deducted, if any
 - ✓ Administrative fee deducted, if any

✓ Benefits of the recharge coupon, in case of combo packs

- With regard to the above, it has to be kept in mind that there are various types of re-charge vouchers and combo packs in the market and in these cases it may not be possible to provide all the details.
- However, the endeavor of Airtel is to provide all the relevant details/ information to the subscribers at the time of recharge/top-up

5.20. In your opinion, what should be done to increase the awareness about the call centre? (Reference Para 3.46)

Bharti Airtel Response:

The findings of the independent survey conducted by TRAI, indicate that generally the customers are well aware of the redressal mechanism at Call Centre. The level of awareness as indicated by the survey is quite high i.e. more than 80% of the customers are aware of the Call Centre details.

While Airtel is using all existing modes of communication such as SUK, Bill, POS, recharge voucher, advertisement, public notice, Website etc to increase the awareness about the call centre, however, we would like to suggest the following additional channels to further enhance the effectiveness of the consumer awareness:

- Customer Care numbers of specific circle i.e. (121, 198 and 10 digit number) should be hard coded in SIM and customer to be made aware of the same so that he has the number available all the time. At Airtel, we already have Customer Care number 121 preconfigured in the SIM.
- Call centre details can be made available by sending sms on dedicated short code and through Airtel Live.
- **Call centre numbers can be published on website with a flash script playing at bottom or top to get quick attention of the customers.**

Further, we believe that **in view of the awareness level being very high for call centre number, there is no need to convey the same through SMS, however the** suggestion given by TRAI to convey/regular update the call centre number by SMS can be considered.

5.21. How can we enhance accessibility of call centres for booking the complaints? (Reference Para 3.53)

Bharti Airtel Response:

- Airtel is providing sophisticated, state-of-the-art Interactive Voice Response (IVR) facility to its customer, which is equipped with the consumer friendly menu driven system that caters entire queries, complaints and any information sought by the customer. The same is supported by the fact that during the last quarter (April-June 2010) our mobile business had received more than 80 million complaints and about 94% of which had been resolved on the real time basis and only 6% of the cases were referred to the backend resolution.
- Further, if customer is not satisfied or he would like to register the complaint, there is always an option to speak to our customer care executive to further lodge a complaint and to get any information pertaining to customer's account as outlined by TRAI's recent guidelines to service providers. In this

regard, we are providing separate facility through short code 198 (toll free), wherein customer has direct access to agent assistance to register his/her complaints

- Airtel also works actively towards training/ educating the call center executives so as to enable timely resolution of customer complaints. We also encourage our customers to use alternate means such as SMS and website to lodge their complaints.

5.22. What are your suggestions about the location of the menu option for talking to a customer care agent/executive in the Interactive Voice Response (IVR) system of the Call Centre/ customer care number, for facilitating easy access to the call centre agent/executive? Should it be the first sub-menu at the third layer, the first layer being the choice of language and the second layer being service menu? (Reference Para 3.53)

Bharti Airtel Response:

Agent access should be clearly communicated while the customer browses through the IVRs. In this regard, it is recommended that the location of the menu option for talking to a customer care agent/executive in the Interactive Voice Response (IVR) system of the Call Centre/ customer care number be the third layer (not specifically at the first sub-menu), the first layer being the choice of language and the second layer being the service menu.

5.23. Should TRAI mandate all service providers to provide complaint booking number accessible from other telecom networks also for complaint booking in case of service disruption? Should such call centre numbers also be toll free? (Reference Para 3.53)

Bharti Airtel Response:

- Airtel is already providing accessibility of call centers for complaint booking from other telecom networks.
- However, this facility should not be made toll free as the same would increase the chances of being misused by making the helpline prone to frivolous callers hindering service to genuine customers with grievances.

5.24. Do you agree that docket numbers should also be sent to subscribers' through SMS who is booking complaint? (Reference Para 3.56)

AND

5.25. Will sending of docket number of complaints to subscribers through SMS help them to pursue their complaints and increase effectiveness of consumer grievance redressal system? (Reference Para 3.56)

Bharti Airtel Response:

We would like to submit that for every single complaint logged with Airtel (Customer Care, Nodal, Appellate etc.) through voice or non-voice channels, we generate a unique, system-generated complaint number that is communicated to the customer over SMS or email. This is used for all subsequent communication and references for that particular complaint. Moreover, the current process of verbal communication can also co-exist.

5.26. Do you feel that unique format for docket numbers across the service providers will increase monitoring and speedy redressal of subscriber complaints? (Reference Para 3.56)

Bharti Airtel Response:

There is **no need** to have a unique format or a common format across the industry and each service provider should be given the flexibility to have its own format.

5.27. Do you agree that customers need to be informed about redressal of their complaints before closure of the docket? If so, will it be desirable to inform the subscriber about status of the complaints through SMS before closure of the docket number? (Reference Para 3.61)

Bharti Airtel Response:

- We do inform the subscribers about the status of the complaints. **There is also a provision to reopen the case by referring the provided complaint number or escalate the grievance to the next level.**
- Also, we believe that it is the closure of complaints within the prescribed time-frame which is more important, rather than giving a regular updates to the subscriber.

5.28. What parameters should be considered to determine the effectiveness of complaint redressal at call centre level? How could effectiveness of complaint redressal at call centre level be measured? (Reference Para 3.66)

Bharti Airtel Response:

Kindly refer to our response to question no. 5.21

Further, Effectiveness of complaint redressal at call centre level be measured through :

- Timely closure of the complaint
- communication to the customer.

5.29. In your views, will it be feasible to indicate tentative time frame for redressal of consumer grievance? Will it increase subscriber satisfaction level? (Reference Para 3.69)

Bharti Airtel Response:

Airtel is already following the practice of intimating the subscriber about the estimated time to resolve the complaint.

5.30. What are your suggestions for using complaints received at call centre for improvement in QoS and processes adopted by a service provider? Do you perceive any need for TRAI to oversee such analysis and monitor corrective actions? (Reference Para 3.74)

Bharti Airtel Response:

- TRAI is already monitoring this issue under QoS as well as Metering and Billing, wherein the Audit is being carried out by TRAI empanelled auditors on yearly basis.
- **We therefore do not perceive any further need for TRAI to oversee / monitor any additional analysis.**

5.31. In your opinion, what should be done to create awareness about the Nodal Officer? (Reference Para 3.77)

Bharti Airtel Response:

- It is submitted that Information about Nodal Officer is being made available to the customer through various means such as start up kit, at sales outlet, customer care (voice and non voice), Manual of practice and websites of TRAI/DoT and Airtel's itself. Our bills also carry the circle specific details for these officers.
- We also publish advertisements in national dailies with all the details of the nodal officers. This is done in regional (vernacular) languages too so that there is wider reach amongst our customers. It is proposed that customer awareness may be raised by utilizing the funds from the TRAI Customers Education and Protection Fund. TRAI is already carrying out Consumer Education Workshops in various locations across the country throughout the year – it is noteworthy to mention that Airtel has been actively participating at these workshops which are attended by our designated Nodal Officers. Further, we would like to go a step further and would suggest the following to increase the consumer awareness:
 - ✓ SMS query short codes for customers to send and receive details for their circle's Nodal/Appellate Officers.
 - ✓ Contact details of the nodal officer can also be periodically made available through IVR/USSD.
 - ✓ As has been suggested by TRAI, Customer Service camps / forums can be organized periodically wherein customers will interact with for Nodal Officers which will also increase awareness.
- Also, we do not agree with the Authority's option of pre-configuring the details of Nodal Officer and Appellate Authority in SIM. This is because of the simple fact that the subscriber would jump the option of call centre and would prefer to directly speak to Nodal Officer.

5.32. What should be the maximum permissible time in which nodal officer must acknowledge the receipt of the grievance and indicate a unique number for future reference? (Reference Para 3.80)

5.33. Do you suggest that the nodal officer give an indicative time for redressal of grievance while communicating receipt of grievance? Will it boost the confidence of the subscriber? (Reference Para 3.80)

5.34. Will it be feasible to communicate the tentative time for redressal of the grievances and ensure redressal within prescribed timeframe? (Reference Para 3.80)

Bharti Airtel Response:

We propose that the timeline should be 3 working days instead of 3 days to acknowledge the receipt of grievance from the date of receipt of complaint,.

To increase the subscriber's confidence, the nodal officer would intimate the tentative timeframe for redressal of complaint as per company's benchmarks for closure of complaint on best effort basis – this will however be within the TRAI prescribed limit of maximum 10 days.

5.35. What framework do you propose for timely disposal of consumer grievances and feedback on status of grievance redressal before disposal? (Reference Para 3.82)

Bharti Airtel Response:

As mentioned above, giving the tentative timeframe to resolve, would help in gaining subscriber's confidence. We would look into the proposal for feedback on status of grievance.

Notwithstanding the above, we feel that customer is concerned more about resolution and as such, pushing status updates would only increase curiosity and additional calls before actual resolution. Moreover, it would not be practical to send internal complaint flow status, which at times would also be difficult for customer to understand.

5.36. In your opinion, what should be done to improve the accessibility of nodal officers? (Reference Para 3.87)

5.37. How would effectiveness of Nodal Officer be monitored? (Reference Para 3.87)

5.38. What should be the parameters and framework to judge the effectiveness of the nodal officers? (Reference Para 3.87)

Bharti Airtel Response (5.36 - 5.38):

- Airtel is fully committed to provide best possible services to its customers and is constantly augmenting the resources to make the reach of the nodal officers more convenient to the consumer.
- It is also pertinent to mention here that a Nodal Officer is not an individual, but is an empowered officer backed up by a team/staff consisting of number of other officials. Hence, a dedicated teams work for resolution of the customer grievances.
- Further, Parameters and framework to judge the effectiveness of the nodal officers could be-
 - Resolution of customer complaints within timeline specified in the Regulation.
 - Complaints resolved at the Nodal Officer level as a percentage of complaints escalated at the Appellate Authority.

5.39. In your opinion, what should be the time frame for redressal of grievances by the Nodal Officer? (Reference Para 3.89)

AND

5.40. What should be done to ensure redressal of consumer grievances within prescribed timeframe?(Reference Para 3.89)

Bharti Airtel Response:

We would like to recommend to do a categorization of the complaints which cannot be addressed within the stipulated timeframe (e.g. Network related) and such complaints should be excluded from above mentioned timelines.

5.41. What framework do you perceive for regular analysis of consumer grievances at Nodal officer level to identify systemic failures and to initiate necessary actions? Do you perceive the need to mandate such provisions?(Reference Para 3.91)

Bharti Airtel Response:

As per existing regulation, Airtel do carry out the root cause analysis and take necessary action in case of mass impact in terms of correction in configuration and waiver/ refund is being given to all impacted customers, hence the same should not be the part of regulation. Customer interests are well protected through existing regulations of TRAI and there is no need for carrying out any changes at this stage.

5.42. What are your views regarding charging of nodal officer Number especially in view of the fact that nodal officer is part of consumer grievance redressal mechanism? Elaborate your response. (Reference Para 3.94)

Bharti Airtel Response:

We believe that the nodal officer no. should not be toll free because of the following reasons:

- If nodal officers or Appellate Authorities numbers will also be toll free, there will be a tendency of the customer to directly reach to nodal officer or Appellate Authority rather than approaching to the call centre. There will also be large-scale accessibility issues since volume of calls will be higher. In such a scenario, the Nodal Officers may become an alternative Call Centre and this may defeat the very purpose of having a higher level for grievance redressal at Nodal Officer level.
- Further, there are already other avenues available which are toll free.
- Moreover, in current scenario, the local charges levied are very minimal. Customer who is genuinely aggrieved and due to some reason that his complaint has not been resolved satisfactorily will not mind paying nominal charges as long as his / her grievance is getting redressed.

5.43. What should be done to enhance awareness about Appellate Authority to ensure effective redressal of consumer grievances? (Reference Para 3.97)

5.44. What framework to you suggest for filing of the appeal to Appellate Authority for redressal of consumer grievances by subscribers? How can it be made easy and user friendly? (Reference Para 3.99)

5.45. In your view, what should be the time frame for acknowledgement of the appeal by Appellate Authority? (Reference Para 3.103)

5.46. Would it be feasible and desirable to convey the tentative time for disposal of the appeal by Appellate Authority to improve subscriber confidence? (Reference Para 3.103)

5.47. How feedback at the time of disposal of appeal can be made more transparent, self speaking and impartial? Is there a need to institutionalise feedback mechanism at appellate authority level of service provider to improve effectiveness of the processes? (Reference Para 3.105)

5.48. What should be the framework to improve the effectiveness and acceptability of the Appellate authority as an independent and impartial body? Provide details of the proposed framework. (Reference Para 3.107)

5.49. In your opinion, what should be the maximum time period for deciding an appeal by the Appellate Authority? (Reference Para 3.109)

Bharti Airtel Response (5.43 - 5.49):

As stated in the earlier response, Airtel in compliance to the regulation already publishes every year the contact details of the Appellate Authority through newspaper and through the bills issued to customers and display the same in every sales office.

It is also pertinent to mention here that maximum numbers of complaints are being resolved at the call center level and the complaints escalated to the Nodal Officer and **the Appellate Authority level are miniscule when compared with the total subscriber universe.** The same is supported by the fact that during last quarter (April-June 2010) our mobile business had received more than 80 million complaints out of which only 61 thousand and 25 thousand complaints had escalated to the nodal and appellate level respectively.

Moreover, adequate and regular training is provided to the call centre executives to ensure effective, efficient and faster resolution of complaints..

- In light of the above, we are of the view that a change in the existing system at the Appellate Authority level may not be necessary. **However, we would like to suggest that filing of an appeal can be made much easier** by simply sending a letter or an e-mail to the appellate authority. Therefore, sending an appeal in a prescribed format should not be mandated.

5.50. What should be the time limit within which the information about itemized usage charges should be provided on request from a pre-paid customer? (Reference Para 3.112)

Bharti Airtel Response:

- Airtel has been providing Prepaid Bills to the customers, upon demand since 2007, as per the Authority's directions issued to the effect. These are available upon payment of a nominal cost.
- In the prepaid service, after completion of every call the customer is informed about the remaining balance in his account. In addition to this, we also provide sms based balance enquiry facility to the customers.

We propose time limit of not more than 15 days to provide itemized bill of last 3 months to the pre-paid subscriber.

5.51. Can you suggest further measures to effectively control provision of value added services without explicit consent of the subscriber? Kindly provide details of proposed framework. (Reference Para 4.7)

Bharti Airtel Response:

TRAI in consultation with the industry has taken various steps to safeguard the interest of the subscribers. For example, more recently, after detailed discussions with the industry, the Authority has laid down the

process, wherein all double key confirmation by pressing * & 9 has been introduced for Hello Tunes Copy or OBD subscription so that there are no accidental activations. Further, in case of any dispute by the Customer regarding subscription of service within 24 hours, TRAI has also made the provision of making refunds.

In this regard, we have empowered our customers wherein Customer can unsubscribe any subscribed VAS by dialing USSD *121# (toll free) and choosing the option of "Stop". In addition to this, Customer can also unsubscribe through various other existing means (toll free) like call centre, SMS, IVR, email etc.

Further, TRAI has also mandated that a common short code 155223 (toll free) as VAS un-subscription helpline for registering subscriber's request for unsubscribing to any VAS service.

We are duly communicating these toll free un-subscription options to all the customers at the time of subscription and renewal of the VAS service, in addition to advertisements, website etc.

All the above measures adequately safeguard customer's interest and VAS is only activated after explicit consent. If for any reason customer feels that VAS has been activated without his / her consent, the customer is empowered to deactivate the same through various means as explained above and get refunds from his / her service provider appropriately.

5.52. In your opinion, what more should be done to increase effectiveness of consumer education? (Reference Para 4.9)

Bharti Airtel Response:

- **The suggestion of the Authority for service providers to hold open houses with the subscribers would serve as yet another opportunity to understand the voice of the customer and help the industry to provide world class services.**
- The feedback received from the subscribers during the workshops will be captured and analyzed for understanding the behavior of complaints which will help to serve them better.
- It is proposed that further awareness may be raised by utilizing the funds from the TRAI Consumers Education and Protection Fund to bring about increased awareness. It is encouraging to see advertisements on television bringing about awareness in telecom consumers regarding fraud SMS / callers and not to share personal details with these fraudsters. Such campaigns will help increase awareness amongst the common man and mitigate the possibility of frauds.
- **We would also request CAGs to take initiatives for educating the customers.**

5.53. How effectiveness of web based Consumer grievance redressal mechanism can be increased? (Reference Para 4.12)

Bharti Airtel Response:

We welcome the initiative of the Authority to implement Web based monitoring system and strongly feel that on line system will help the customer to track the complaints sent to service provider more effectively & transparently.

We believe that the effectiveness of the web based system can be increased by adopting following measures:

- Adequate promotion /publicity for customer awareness.
- Accessibility, ease of use of the portal to make it user friendly
- Clarity about the working of the Web portal.

However it needs to be borne in mind that all operators already have Nodal Officers and Appellate Authorities deputed and in place to resolve customer grievances when they reach the Service Provider. The users of the Web Portal need to be educated that this portal is not exclusive to the decisions already imparted by the Nodal Officers and Appellate Authorities on the same matter. Also, Service Providers do not deem the need for any additional escalation offices like Ombudsman or Grievance Officers.