



Cellular Operators Association of India

RSM/COAI/099
15th September 2010

Dr. J.S Sarma,
Chairman,
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Old Minto Road,
New Delhi-110002

Dear Sir,

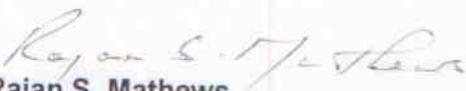
**Subject: COAI Response for TRAI's Consultation Paper on
Review of measures to protect interest of consumers in the telecom Sector**

This is with reference to the TRAI's consultation paper on "Review of measures to protect the interest of consumers in telecom sector".

In this regard, please find enclosed COAI's response as Annexure-1.

We hope our submissions would merit your kind consideration.

Kind Regards,


Rajan S. Mathews,
Director General

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**COAI Response for TRAI's Consultation Paper on
Review of measures to protect interest of consumers in the telecom Sector**

INTRODUCTION

As the Authority is aware, the mobile sector in India is characterized by intense competition with as high as 14 operators in the market. The competitive scenario is going to get more intense with the introduction of MNP & 3G.

In a scenario of intense competition, the key focus of every service provider is to retain and attract new subscribers. Some of the initiatives already taken/ suggested in this response by the mobile industry are enlisted below:

- a) The industry prepared Citizen's Charter for mobile telecom subscribers, which was submitted to TRAI. The purpose of this Charter was to raise awareness amongst the subscribers about service provider's efforts/ steps undertaken to further enhance customer satisfaction.

The Charter was an attempt to broadly pinpoint our key areas of commitment to subscribers. The assurances given in the charter would be reflected in the benchmarks we are suggesting in our response.

- b) COAI members are organizing the workshops/ open house sessions for Consumer Advocacy Groups (CAGs)/ customers in each service area. We believe that holding open house sessions with the subscribers/ CAGs would serve as yet another opportunity to understand the voice of the customer and help the industry to provide world class services.
- c) We have suggested some of the new measures to increase the awareness of contact details of Nodal Officer. E.g. the mobile industry can make available the contact details of the nodal officer periodically at the IVR/SMS OR the other option could be to send a SMS back (giving details of Nodal officer) to only those subscribers, who made the complaints at the call center.
- d) We have also proposed to reduce the time taken for redressal of grievances at the Appellate Authority from 90 days to 60 days.

We would like to reiterate that the industry is working constantly to improve the standards and match up to the best that the industry can deliver and also at the same time to meet the enhanced levels of customer expectation and needs.

Our member operators are committed to constantly improving their processes and systems by incorporating feedback from subscribers, based on their requirements. Operators are open to all suggestions and proposals from subscribers to further strengthen and improve services. We will also endeavor to continuously benchmark ourselves with the best in telecom and best in other service industry and actively try to adapt practices which can benefit our customers. The same would be clearly visible from the suggestions/ steps we have proposed in this response.

CHAPTER - II ISSUES RELATING TO QUALITY OF SERVICE

Termination/ Closure of Service

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

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?

COAI Response-

- Whenever there is a request for termination/ closure of service, the endeavor of every service provider is to first understand the problem of the subscriber so as to retain the subscriber. Adequate time should be given to the service provider for the same.
- Hence, 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. However, the same should be from the day of receipt of complaint. However some exception as listed below should be allowed :
 - i) The Corporate/ bulk accounts
 - ii) Customer himself gives a timeline of more than 7 days for termination of service.
- With regard to seeking explicit consent of the customer, **we wish to submit that all channels, including voice should be allowed.** It should NOT be necessary that the consent for continuing the service has to be given in writing.

Resolution of billing complaints/ charging complaints And Period of applying credit/waiver/adjustment to customer's account from the date of resolution of complaints

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

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?

COAI Response-

- So as **to enhance the resolution of the billing/charging complaints**, we propose that:
 - > **investigation** of the complaint
 - > **resolution** of the complaint
 - > **and communication** to the subscriber shall be completed within 4 weeks.

- For post paid- The credit/waiver/adjustment to customer shall be displayed/ made available in the next billing cycle.
- For pre paid- Adjustments and waivers can be reflected within 3 days.

Time taken for refund of deposits after closure

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

AND

5.12. What steps do you suggest for timely refund of deposits after closure/termination of service?

COAI Response-

- It is submitted that the existing provision of 60 days should be continued with.
- The 60 days will be the outer limit and the service providers will endeavor to ensure that once the service is terminated, the refund is made at the earliest.
- However, there may be a few exceptions to the above such as
 - i) Corporate Customers
 - ii) International Roaming

Parameters applicable to broadband service providers

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

AND

5.14. How the present provisions can be effectively implemented?

AND

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

COAI Response-

N.A.

Issues relating to sampling of tariff plans for audit

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?

COAI 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.

Issues relating to premium rate services

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?

COAI Response-

- At the outset, we would like to inform you that, some services are toll free, and there are other services which are tolled or are chargeable. These are chargeable at the behest of third party vendors who levy a charge on telecom service provider.
- It has to be kept in mind that a subscriber becomes aware of the premium service only after seeing an advertisement (TV commercial, hoardings, print etc.) and the higher call rates are mentioned in the advertisement. These advertisements are the real mode of promoting these services, and customer is always aware of the charges.
- So as to increase awareness about the higher call rates for premium service, going forward, the service providers will ensure and will also notify 3rd parties operating these services to ensure that **the call rates for premium service are displayed more prominently in the advertisements and websites.**

3rd parties operating these services should also look at the option of alert message/ announcements about premium calls.

Issues relating to pre-paid customers

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?

COAI Response-

- So as to enable a pre-paid subscriber to understand his usage, the service providers are already providing the following information to the prepaid subscribers immediately on completion of every call:
 - > Amount deducted for the call
 - > Balance left after the call

Apart from this, service providers are also looking at the feasibility of providing detail like- "duration of the call".

- **In addition to this, many of the operators already have a service, wherein the details can be pulled by dialing a toll free short code.**

Issues regarding recharging to pre-paid 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?

COAI Response-

- We believe that the following information is necessary after recharging a prepaid connection:
 - > Value credited to the subscriber
 - > Total balance
 - > Amount deducted for Processing fee & Taxes
 - > Validity Expiry date.
- With regard to the above, it has to be kept in mind that there are various types of recharge 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 all the service providers will be to provide all the relevant details/ information to the subscribers at the time of recharge/top-up

CHAPTER – III CONSUMERS PROTECTION AND REDRESSAL OF GRIEVANCES

I. Grievance Redressal at Call Centre

Awareness of Call Centers

5.20) In your opinion, what should be done to increase the awareness about the call centre?

COAI 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.
- **In any case, the operators would continue their efforts with regard to providing the details through following means-**
 - Advertisements// public notice,
 - Bills,
 - Starter pack
 - Sales outlet
 - Operator's Website
 - TRAI's Website
 - Configured in SIM etc.
- **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 the call centre number by SMS can be considered.**

- However, some of the operators have tried the option of transferring over the air, but we have got the feedback that there were problems associated with this option and was not successful.

Accessibility of Call Centers

5.21) How can we enhance accessibility of call centers for booking the complaints?

COAI Response-

- We believe that our member operators have deployed sufficient resources to enable the subscribers to have access to their call centers.

For the parameter, “Accessibility of call centre”, approx. 27% of the operators were not meeting the benchmark. Out of these, only 7% of the COAI member operators are not meeting the benchmark. (Source- TRAI PMR, QE Mar’10)

As far as “%age of calls answered by the operators (voice to voice) within 60 Seconds” is concerned, around 37% of the operators were not meeting the benchmark and only in 14% of cases, COAI members were not meeting the benchmark. (Source- TRAI PMR, QE Mar’10)

Notwithstanding the above, we would like to submit that our member operators are making all efforts and would try to meet the benchmark in all the service areas in the near future.

- All service providers have invested significantly to set up sophisticated, state-of-the-art Interactive Voice Response (IVR) systems with consumer friendly, menu driven options that can easily cater to an entire gamut of queries/information requirements of the subscriber.
- If the subscriber is not satisfied or he would like to register the complaint, there is always an option available to speak to customer care executives.
- It may be appreciated that Consumer friendly IVR has been set up since, the use of call centre resources for “information related calls” diverts a large portion of the call centre resources away from addressing genuine consumer grievances.
- Service Providers shall actively work towards training/ educating the call center executives so as to enable timely resolution of customer complaints.
- **So as to improve accessibility of call centers, operators continuously keep increasing the capacity (including manpower) on a periodic basis depending on the call volumes.**
- **Moreover, recently most of the service providers have implemented 198 as the dedicated call centre number for complaints and this has improved the accessibility to customers wishing to make 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?

COAI Response-

To make it easier for the subscribers to reach to a customer care executive, **we would like to recommend 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 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?

COAI Response-

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

Issue of docket numbers for complaint booking

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

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?

COAI Response-

- **Docket numbers shall be sent to subscribers through SMS for booking a complaint.** Moreover, current process of verbal communication can also co-exist.
- Sending the docket number through SMS will help the subscriber to pursue the complaint and will thus increase the effectiveness of the redressal system.

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

COAI Response-

In our view, a unique docket number format across all operators would not help in any way. Docket numbers are a means to track complaints and ensure resolutions etc. Each

operator should be free to follow a system that suits them best and enhances their own internal responses.

Moreover, the systems & applications used by operators have different architecture & platforms which have a defined structure of docket numbers being issued & the integration would be a difficult task

Feedback on consumer complaint redressal

5.27) Do you agree that customers need to be informed about the status of 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?

COAI Response-

- In our view, it is the closure of complaints within the prescribed time-frame which is more important, rather than giving a regular updates to the subscriber.
- We believe that even at present, the service providers do inform the subscribers about the status of the complaints. The same is also acknowledged by the independent survey. **In future also, service providers shall ensure that once a complaint is resolved, an appropriate communication is sent to the subscriber confirming the same.** If the subscriber is not satisfied there is always an option available to speak to customer care executives or escalate the grievance to the next level.

Effectiveness of grievance redressal

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?

COAI Response-

- Service providers impart regular training to the call center executives to ensure effective, efficient and faster resolution of complaints.
- The call centre officers have been trained on three tier grievance redressal system and they have been instructed to share nodal officer's details in case the subscriber is not satisfied.

One of the operators figure shows that the % of complaints resolved at the call centre level is more than 90%. For another operator it is as high as 96% (for the QE June 10). This clearly shows the effectiveness of the complaint redressal at the call centre level.

- It has to be kept in mind that the subscriber universe is very large. Thus while the operators report to TRAI high percentage of redressal of complaints at the call center level, there will always be some grievances lodged with Nodal officer's level. And these grievances lodged with Nodal officer's level constitute only a small %age of the total complaints.

- It may not be fair to draw conclusions regarding the need to increase the effectiveness of complaint redressal system on the basis of these grievances lodged with Nodal officers.
- Our member operators are committed to constantly improving upon their processes and systems by incorporating feedback from subscribers, based on their requirements and also to be open to all suggestions and proposals from subscribers to further strengthen and improve services. We would like to further inform that the operators also carry the survey on their own to find and fix the problem.
- **The parameters which could be considered to determine the effectiveness are as follows:**
 - **Complaints resolved at the Call Center as a percentage of complaints escalated at the Nodal Officer level**
 - **Time taken to resolve**
 - **Repeat Complaints is an additional measure to determine the effectiveness of complaint redressal at call center.**
 - **Customer voice or feedback should be captured to monitor effectiveness of complaint closure.**

Time taken for grievance redressal for various grievances

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?

COAI Response-

- Yes, in our view, subscriber satisfaction levels would increase, if the tentative timeframe is indicated to them.
- **We believe that most of the operators are already following the practice of intimating the subscriber about the approximate time to resolve the complaint.**

Root cause Analysis of complaints booked at Call centre

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)

COAI Response-

- Operators do carry out the root cause analysis of most of the complaints booked at the call centre. Infact, in this competitive telecom scenario, it is imperative for the operators to carry out this kind of exercise, in order to provide world class service and retain the existing subscribers. Moreover, TRAI is already monitoring this issue under Metering and Billing, wherein the Audit is already being carried out by a 3rd party.

- **We therefore do not perceive any further need for TRAI to oversee such analysis.**

II. Grievance Redressal at Nodal Officer

Awareness about Nodal Officers

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

COAI Response -

- Adequate publicity is given with regard to the contact details of the nodal officers of the service providers.
- **Apart from the existing modes of communication (SUK, Bills & Website etc) we suggest the following measures:**
 - Each company specific outlet must prominently display the contact details of the nodal officer and at the time of sale, customer should be communicated about the details of the Nodal officer.
 - **Frequency of advertisements** informing the subscribers about the nodal officers can be **increased**
 - Moreover, **operators can also look at the mechanism of starting short codes query for subscribers**, wherein the Nodal officer's details can be received by sending a SMS in a prescribed format.
 - **Consumer camps/forums should be conducted** and nodal details can be shared.
- Besides the above, so as to increase awareness, the mobile industry would like to go a step further and would suggest that the contact details of the nodal officer can also be periodically made available at the IVR/USSD.

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. **Therefore, we would like to propose another option wherein a SMS can be sent back (giving details) to only those subscribers, who made the complaints at the call centers.**

One of the operators figure shows that the % of complaints resolved at the nodal officer level is more than 90% (for the QE June 10). One of our other members has resolution level as high as 99%. This shows the effectiveness of the complaint redressal at the nodal officer level.

Receipt of grievance and expected time of redressal:

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)

COAI Response-

- **The industry would like to recommend**
 - **the time of 3 working days to acknowledge the receipt of grievance,.**
- To increase the subscriber's confidence, the nodal officer would intimate the tentative timeframe for redressal. (Kindly also see our response to 5.39 also)

Feedback on consumer grievance redressal

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)

COAI Response-

- As mentioned above, giving the tentative timeframe to resolve, would help in gaining subscriber's confidence. The operators 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.

Accessibility of Nodal Officer and Effectiveness of grievance redressal

5.36) In your opinion, what should be done to improve the accessibility of nodal officers?

5.37) How would effectiveness of Nodal Officer be monitored?

5.38) What should be the parameters and framework to judge the effectiveness of the nodal officers?

COAI Response-

- In light of the rapidly increasing subscriber base, the service providers are constantly augmenting resources. So as to further enable access to nodal officers, the service providers are examining the possibility of increasing the nodal officers per service area.
- **It is 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.**

- The suggestion given by the Authority of allocating nodal officers in better reach of subscribers in rural and semi urban areas is well taken and shall be considered by the operators.
- Parameters and framework to judge the effectiveness of the nodal officers could be-
 - Resolution of customer complaints within 7 working days.
 - Complaints resolved at the Nodal Officer level as a percentage of complaints escalated at the Appellate Authority level

Time taken for redressal of various grievances at Nodal Officer

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

5.40) What should be done to ensure redressal of consumer grievances within prescribed timeframe?

COAI Response-

We would like to recommend the following timeframes for redressal of grievances:

- **Three working days for redressal of grievances relating to disruption of service**
- **Seven working days for other complaints** from the date of acknowledgement

Analysis of grievances and corrective action to improve effectiveness of Nodal Officer

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?

COAI Response-

It is an ongoing endeavor of the service provider to carry out the root cause analysis and hence should not be the part of regulation and should be left to market forces. Being part of service industry, operators are extremely concerned about the service to customers and carrying out RCA is being considered as important and necessary tool for reducing customer dissatisfaction on a large scale.

Moreover, after making it mandatory, it would not be possible to bring in the uniformity among all operators, due to the multiplicity of root causes/ reasons involved.

Charging of Nodal Officer Number

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)

COAI Response-

- **We believe that the nodal officer no. should not be toll free because of the following reasons:**
 - If nodal officers telephone will also be toll free, there will be a tendency to directly reach to nodal officer rather than approaching to the call centre. In that case, the Nodal officer 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. This would inflate the calls to be addressed by Nodal officer and would affect the quality of resolution by Nodal officer. Moreover, it would violate the three tier mechanism being set up.
 - Further, there are already other avenues available which are toll free. For example, the new web based mechanism being implemented, would give another channel for the subscribers to register their grievances at the nodal officer's level.
 - Moreover, in current scenario, the tariffs/ local charges levied are very minimal.

III. Grievance Redressal at Appellate Authority

Awareness about Appellate Authority:

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

Refer COAI response below.

Procedure to file an appeal:

5.44) What framework do 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)

Refer COAI response below.

Acknowledgement of receipt of an appeal and likely time frame for disposal

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)

Refer COAI response below.

Feedback on disposal of appeal:

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)

Refer COAI response below

Effectiveness of redressal of grievances by Appellate Authority:

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)

Refer COAI response below

Time taken for redressal of grievances at Appellate Authority:

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

COAI Response (Q 5.43 to Q 5.49)

The service providers 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.

In today's competitive environment, it is the endeavor of each service provider to retain subscribers. Hence maximum numbers of complaints are resolved at the call center and the nodal officer level. **The complaints escalated to the Appellate Authority are minuscule when compared with the total subscriber universe.**

Moreover, over the years all operators have invested heavily in the call centers so as to make the call centers more and more robust. Operators have also continuously invested in training the manpower at the call center.

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 some of the following measures-**

- **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.
- The time frame of acknowledgement of complaint by the Appellate Authority **shall be reduced from the present time of 3 days to 2 days.**
- **Time taken for redressal of grievances at Appellate Authority should be reduced to 60 days.**

Providing usage details in respect to Pre-paid mobile connections:

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)

COAI Response

- It is an endeavor of the service providers that information pertaining to “call charges” and the balance left is made available to prepaid subscribers after completion of every call.
- **It is pertinent to mention here that billing system for pre-paid and post-paid works differently.** Further, in pre-paid, the operators have different systems for (say) caller tunes, SMS, and other VAS services. Therefore, it takes some time to collate the data.
- For providing the itemized usage data for the last 30 days to the pre-paid subscriber, the time limit within which the information should be provided should not be more than 15 days.

CHAPTER –IV OTHER ISSUES

PROVISION OF VALUE ADDED SERVICE WITHOUT EXPLICIT CONSENT

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)

COAI Response-

- As mentioned by the Authority also, TRAI has come up with several directions in association with the industry 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 OBD subscriptions have double confirmation prompts.
- A short code 155223 has also been allotted as VAS helpline for registering subscriber’s request for unsubscribing to any VAS service.
- VAS services shall be activated only after compliance and following of the laid down guidelines by TRAI on this and any shortcomings highlighted by customers would be rectified/streamlined. Adequate care will be taken and processes would be made more robust.
- Prior to activating the VAS service, the service provider shall ensure that complete information regarding tariff is made available to the subscriber.

CONSUMER AWARENESS BY SERVICE PROVIDERS

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

COAI 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 analysed for understanding the behaviour 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.
- **We would also request CAGs to take initiatives for educating the customers.**

WEB BASED TELECOM CONSUMER GRIEVANCE MONITORING SYSTEM (TCGMS)

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

COAI Response-

TRAI is already in the process of implementing such a system. **We welcome the initiative** of the Authority to implement Web based monitoring system. 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.
