

**S K Gupta, Advisor (QoS),  
Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg, New Delhi-110 002.  
Tel.: 011-23230404  
Fax: 011-23213036  
E-mail : [advqos@traigov.in](mailto:advqos@traigov.in)**

**CONSULTATION PAPER ON REVIEW OF MEASURES TO PROTECT INTEREST OF  
CONSUMERS IN THE TELECOM SECTOR**

Sir,

1. Please refer to TRAI Consultation paper No: 10/2010 on Review of measures to protect interest of consumers in the telecom Sector. Comments on selected issues are at following paragraphs.

**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?**

2. **Tariff Plans.** In addition to the proposed audit of tariff plans TRAI may consider an order wherein each TSP provides a brief on its tariff plan prior to its launch. These maybe sampled to cover the early period of their launch for anti-consumer/ competitive provisions. For example a TSP launched its data card with a provision that tariff plans will be changed only at the end of the billing cycle and not at anytime on pro-rata basis as is the norm.

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

3. **Call Centre Awareness**

(a) The call centre numbers must be prominent by displayed on the home page of every service provider at a pre-designation location (Top rt corner ect) irrespective as to how it affects the aesthetics of the web page.

(b) Same is the case of bills/e-bills. Front side top in English and local language and a readable font size. The other details like that of the nodal officer may be displayed on the last page as is the case at present.

(c) Call centre details must be pre-fed into SIM of the service provider for all pre-paid and post-paid customers.

(d) As per Regulation 20 of Telecom Consumers Protection and Redressal of Grievances Regulations 2007 every Service provider shall publish a —Manual of Practice for handling consumer complaints containing following information relating to Basic Telephone Service, Cellular Mobile Telephone Service and Broadband Service. I could access the manual with relative ease only in the case of Vodafone. Regulation 20 should be elaborated to include internet access.

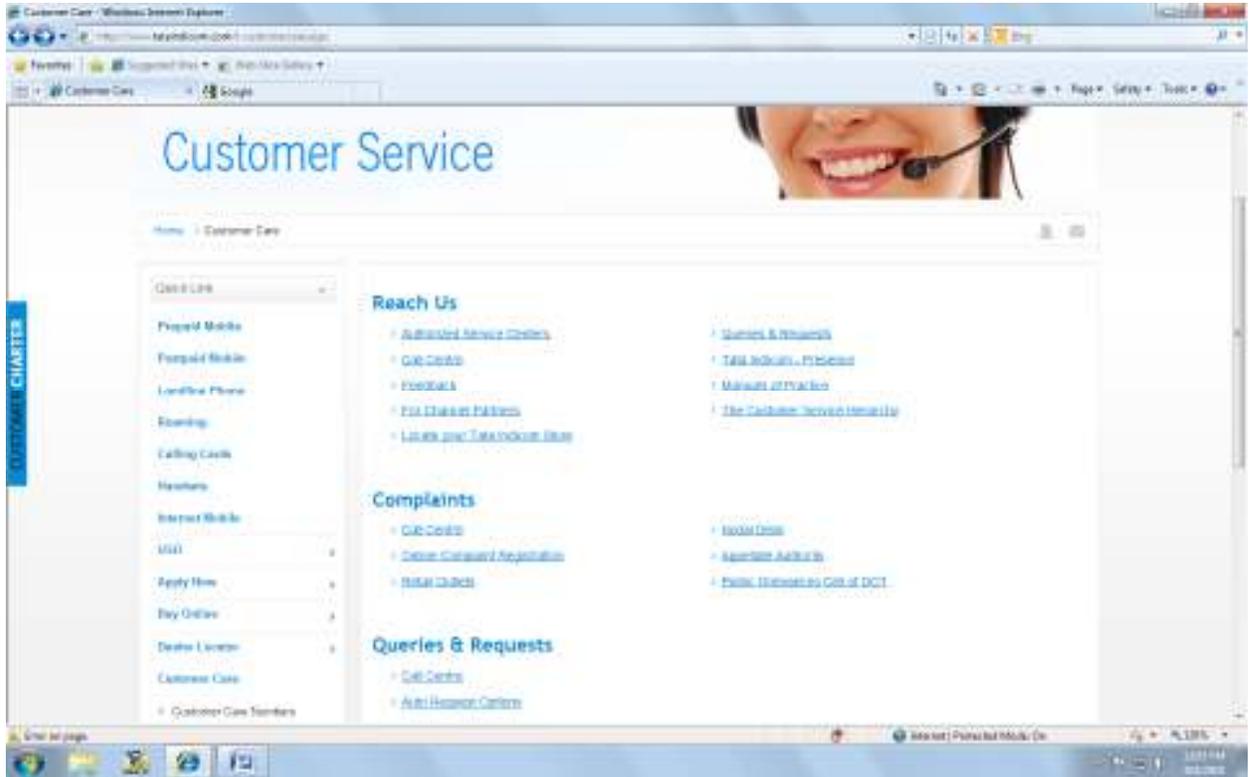
### **How can we enhance accessibility of call centres for booking the complaints?**

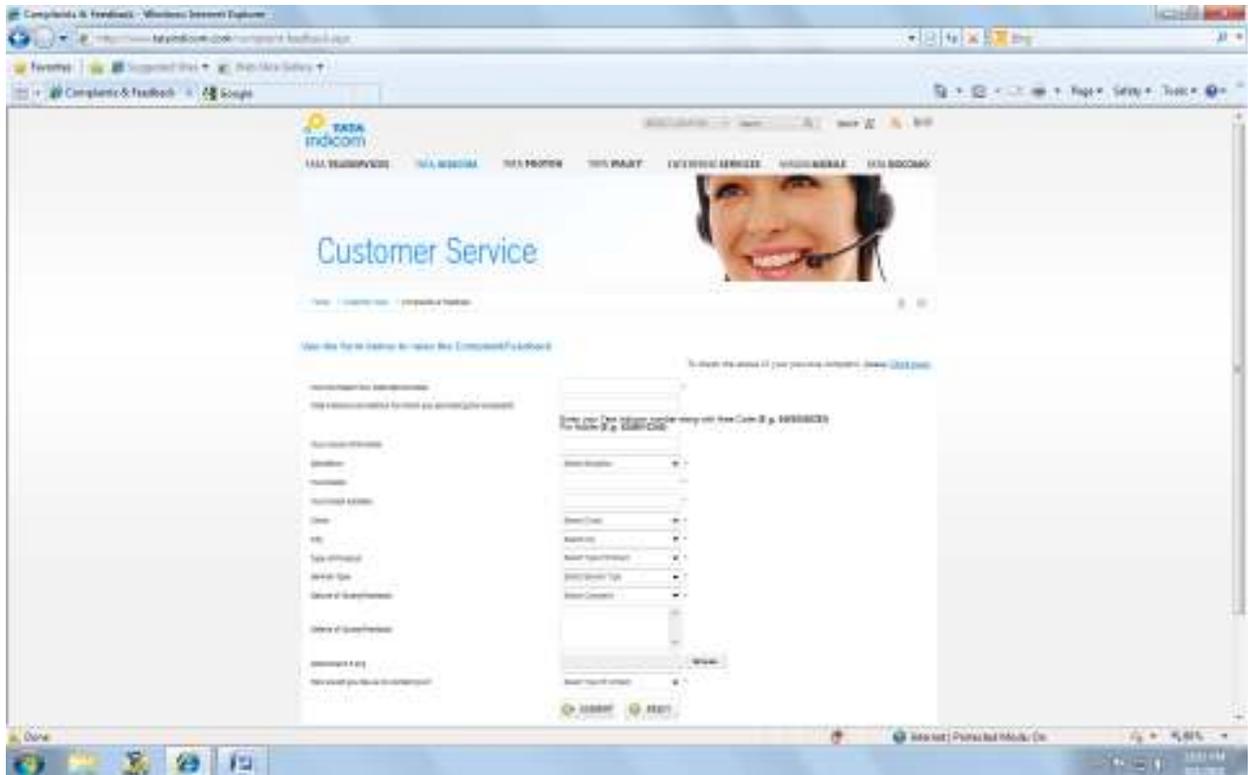
4. **Accessibility of Call Centers.** The QoS parameters used to assess performance of call centre requires a re-look. Issues of call drop during the session, time taken by the operator to understand, login and provide to you a complaint number need to be considered. Call centers take inordinate amount of time to verify your status (despite the fact that you have keyed in your details and confirmed it through the IVRS); complaint number generation can take upto 3 mins while the customer is kept on hold. At this stage if the call drops, he has to repeat the entire procedure again.

5. Accessibility of call centers only from the telephone of the same service provider is anti-competitive, inconvenient and lacunae in customer grievance redressal that requires immediate attention. A customer despite having two telephone connections but from different service providers still has to make the effort of locating another telephone to make the service complaint. At place where inter-connectivity does exist its call completion rate and speech quality is so poor that customer is compelled to call from another tele of the same service provider (PI try MTNL to Airtel and vice versa). To this end a single number toll free complaint redressal system would be a great idea.

6. **Internet based Complaint Registration Mechanism.** One measure that can resolve the problem of call centre access is web/internet registration of subscriber complaints. Notwithstanding the effect of internet penetration and literacy level, web registration of complaints has significant potential to achieve subscriber satisfaction. The Regulations (2007) and the TRAI paper have not dwelled on it. While TSPs ask for feedback through this medium they have not used it for complaint registration. However Tataindicom website provides an indication as to how to reach out to subscriber and web registration of complaints. The complaint numbers provided on

registration in this can be of the same format as provided by the call centre with a common database so that progress in future can be obtained through the call centre also.





**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?**

**7. Issue of Docket number by SMS.**

(a) This is a good practice and must be encouraged. Concept of obtaining alternate number from the customer be it landline/mob must be followed by service provider.

(b) Unique format across service providers would be relevance if we implement single agency complaint centre.

(c) A recommendation of 'day-serial number' may be examined. This serial number is given to the customer as soon as he interacts with the voice/operator and is valid till such time docket number is provided. In case of lengthy complaints during call drop/disruption the entire procedure is not repeated and operator can commence from the last interaction. This is relevant as the operator answering the customer the second time need not be the same operator who had received the earlier call. This is more so in case of broadband complaints where

troubleshooting, warranty verification etc are involved prior to issue of docket number to the customer.

### **Misc Issues**

**The following issues may also be considered in addition to issues highlighted for comment in the consultation paper:**

8. In evaluation of the best practices listed out in the paper it is suggested that TRAI should deliberate on the following:

- (a) Consider creating a dedicated sub-org within its overall organisation on the lines of CPD (Pakistan) or CCC (South Africa) to address consumer/subscriber grievance.
- (b) In the second stage establish its own call-centre on the lines of NTRA (Egypt), as the numbers of subscribers and the services provided by the TSPs increase the grievances including the unresolved ones requiring attention of TRAI will increase.
- (c) TRAI should specify its stand when a consumer approaches the Consumer Forum/Court against the TSP. TRAI ideally should be in a position to provide a brief with chronology and docket numbers to the forum/court to put the action of the consumer and the response of the TSP beyond contradiction.
- (d) Consider harmonizing with the provisions of the Consumer Protection Act.

9. What is the status of the under mentioned avenues of public grievance redressal in the current framework of providing redressal:

#### **(a) Public Grievances Cell of DOT**

<b>UNIT</b>	<b>TEL. NO.</b>	<b>FAX NO.</b>	<b>WEBSITE</b>	<b>E-MAIL ADDRESS</b>	<b>POSTAL ADDRESS</b>
PG Cell	011-23356666	011-23357777	<a href="http://www.pgportal.gov.in">www.pgportal.gov.in</a>	<a href="mailto:ddgpg@bol.net.in">ddgpg@bol.net.in</a>	112, Sanchar Bhavan, 20, Ashoka Road, New Delhi 110001

The web-link opens out to:

**(b) Department of Administrative reforms and Public Grievances**



10. Advisories on situations such as loss of mobile phone ect be provided to consumers. This is being done in the case of Reliance communications.
11. I would like to mention a few good practices followed by TSPs:
  - (a) Tataindicom obtains subscriber feedback through SMS on the performance of its call centre. It also seeks feedback on resolution of a complaint on tele.
  - (b) Airtel seeks feedback on the procedure adopted by its representative; whether he displayed his ID card, provided required documentation ect. Physical verification by a supervisor of complaints resolved is also done at times.
  - (c) Airtel intimates through SMS generation of the monthly bill and confirmation of receipt of payment.

Regards

Yours sincerely,

Monish Gulati