

**Reliance Communications Limited’s Response to the Consultation Paper on  
Complaints / Grievance Redressal in the Telecom Sector**

**Executive Summary**

- A. Despite a substantial increase in the subscriber base from Dec 2013 till Jun 2016, the existing 2–tier complaints redressal system has withstood the test of time and has been able to deliver the required results in terms of improved customer satisfaction.
- B. No changes are required to be made to the existing system as it has proved its efficacy over the years.
- C. In view of the plethora of mandated grievances redressal mechanisms already available for the customers, there is no requirement of establishing a separate - independent and appropriately empowered - structure to resolve telecom sector complaints and grievances.
- D. There is no need for revisiting the option of establishing an office of Telecom Ombudsman as despite the increase in customer base over the years, the number of complaints have remained static and well below the benchmark set by the Authority.

**Q1: Is the complaint redressal mechanism, as presently existing, adequate or is there a need to strengthen it?**

**Q2: Are there any specific changes that can be made to the existing system to improve it?**

**Our Response**

Yes, the complaint redressal mechanism, as presently existing, is considered adequate to handle the customer complaints.

No changes are required to be made to the existing system as it has proved its efficacy over the years.

Year	Number of complaints received by		Total	Customer Base	%
	DoT	TRAI			
2013	37202	20161	57363	933000000	0.006%
2014	52265	20386	72651	996400000	0.007%
2015	63964	23293	87257	1036410000	0.008%
2016 (upto June)	29426	9276	38702	1058030000	0.007%

- 1. As can be observed from the table above, despite an almost 12% increase in the customer base from 93 mn in Dec 2013 to more than 1 bn in Jun 2016, the customer complaints have remained static at around .007% of the subscriber

**base.** Therefore, it clearly brings out the fact that the existing 2–tier complaints redressal system has withstood the test of time and has been able to deliver the required results in terms of improved customer satisfaction. **The disparity pointed out in the CP in the number of complaints and appeals handled by the various TSPs can be attributed of the lower level of awareness of the availability of the redressal system among the customers.**

2. The Authority has laid down the standards of QoS to be provided by the service providers and ensure the quality of service by mandating all TSPs to submit performance report against the QoS parameters. Authority also conduct the periodical survey of such service provided by the service providers so as to protect interest of the consumers of telecommunication service. The Authority has clearly defined performance benchmarks for customer service QoS parameters such as Metering and Billing Credibility, Resolution of Billing and Charging related complaints, response time to the customers for assistance. Operators failing to meet these benchmarks are subjected to financial disincentives . Authority has also appointed agencies to verify the information provided against the QoS performance parameters.
3. Even the customer’s complaint redressal mechanism is subjected to audit by the authority wherein the Authority empanelled Metering and Billing auditor examines the customer’s complaints received in the complete year and validates whether the TSP had provided satisfactory resolution for the same. Any observations revealed in these audits are reflected in the Audit Report and TSPs are mandated to submit the Action Taken Report for the same.
4. Service differentiation is key factor for a TSP to retain the customers in their network. TSP have taken many initiatives such as **Live Chat with customer care executives, mobile application** to mange services, register complaints, service duplicate bill requests, etc. With the increased adoption of data enabled smart phone, such measures have provided an effective channel, to the customers, to raise their complaints / grievances and seek resolution.

### **Our recommendations**

5. **Despite a substantial increase in the subscriber base from Dec 2013 till Jun 2016, the existing 2–tier complaints redressal system has withstood the test of time and has been able to deliver the required results in terms of improved customer satisfaction.**
6. **No changes are required to be made to the existing system as it has proved its efficacy over the years.**

**Q3: Should a separate - independent and appropriately empowered - structure to resolve telecom sector complaints and grievances be established?**

**Q4: If yes, please comment with regard to the organization; its structure; kinds of complaints to be handled and its powers?**

**Our Response**

**No, there is no requirement of establishing a separate - independent and appropriately empowered - structure to resolve telecom sector complaints and grievances.**

1. The CP itself has listed plethora of mandated customer redressal mechanisms as given below. These coupled with TSP's own initiatives such as Live Chat with customer care executives, mobile application, etc, are considered adequate to resolve the customers complaints and grievances.
  - a. Call Centre: TRAI has notified a grievance redressal mechanism for the all the service providers under Telecom Consumer Protection and Redressal of Grievance 2007. The regulation mandates establishments of Grievance Mechanism for resolution of consumers' complaints within the company as level of Call Centre, and Appellate Authority. Consumers can contact the Complaint Centre of service provider on toll free number at the first instance for redressal of their complaints. Complaints pertaining to fault repair, service disruption and disconnection of service have to be attended within a maximum period of 3 days. Other complaints to be attended by the Complaint Centre within a maximum period of 7 days, subject to time limits laid down in regulations on quality of service. The cases where no time limit is specified, shall be addressed within 3 days.
  - b. Appellate Authority: If the consumer is not satisfied with the resolution of the complaints, he can approach the Appellate Authority for redressal of his complaints. Appeal may be submitted with Appellate Authority through e-mail or facsimile or post or in person, without paying any fee. Regulations also prescribes establishment of an Advisory Committee to examine and render advice on the appeals filed before the Appellate Authority. Advisory Committee shall comprise of two members, one member being representative of consumer organisation registered with TRAI and second being member from the service provider.
  - c. PG cell of Dot: In case a grievance is not redressed even after exhausting the procedure as prescribed above, an individual complainant without prejudice to his right to approach an appropriate Court of Law, may approach Public Grievance Cell of Department of Telecommunications (DoT) with all documentary

evidence(s) for non-redressal of his grievance at concerned Service Provider level. Customer may submit grievance through Portal, Fax, phone and post.

- d. Twitter sewa: Twitter sewa is also a channel available to the customers to raise the Grievances.
  - e. TDSAT: An Appellate Tribunal, known as Telecom Disputes Settlement and Appellate Tribunal (TDSAT), was established by the Central Government in May, 2000 to adjudicate any dispute between a licensor and a licensee; between two or more service providers; between a **service provider and a group of consumers**; and to hear and dispose of appeal against any direction, decision or order of the Telecom Regulatory Authority of India. The Tribunal, therefore, exercise both original and appellate jurisdiction.
  - f. National Consumer Helpline has been also taking up various issues of consumers to the Telecom companies as well as TRAI.
  - g. Lok Adalats.
  - h. Consumer Courts setup under the Consumer Protection Act, 1986. These courts are also available to the customers for the redressal of the grievances and All TSP have already have setup to address the same. Telecom sector have very less cases in Consumer courts
2. **Mobile Number Portability**. Apart from the above listed grievance redressal mechanisms, the subscribers in telecom sector also have the privilege of mobile number portability. With 7-10 Operators in a LSA and the subscriber having been empowered with the MNP facility, the customer has the option of exercising his choice to shift the operator in case he / she experiences any deficiency in service or the grievance redressal mechanism. **Service portability option available to all Customers makes all the TSPs to go extra miles when it comes to resolving customer complaints.**
  3. **Ombudsman in other Sectors**. It is brought out that the already established Ombudsman in the Indian scenarios that have been elucidated in the CP, are in sectors like Insurance, Banking, Power distribution, etc. Unlike telecom sector, these sectors do not have such robust and uniform complaint / grievance redressal mechanisms and hence the need of an Ombudsman there.

### Our recommendations

4. **In view of the plethora of mandated grievances redressal mechanisms already available for the customers, there is no requirement of establishing a separate - independent and appropriately empowered - structure to resolve telecom sector complaints and grievances.**

**Q5: Is establishing an Office of Telecom Ombudsman an option that should be revisited, especially given the experience of the past few years of increasing numbers of complaints?**

**Q6: If yes, how should it be created – the legal framework? What should be its structure? How should it be funded? What types of complaints should it handle? What should be its powers, functions, duties and responsibilities?**

**Our Response**

**No, there is no need for revisiting the option of establishing an Office of Telecom Ombudsman as despite the increase in customer base over the years, the number of complaints have remained static and well below the benchmark set by the Authority.**

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- 1. As can be observed from the table above, despite an almost 12% increase in the customer base from 93 mn in Dec 2013 to more than 1 bn in Jun 2016, the customer complaints have remained static at around .007% of the subscriber base.** Therefore, it clearly brings out the fact that the existing 2–tier complaints redressal system has withstood the test of time and has been able to deliver the required results in terms of improved customer satisfaction.
- It is felt that the *“experience of the past few years of increasing numbers of complaints”* quoted in the above question is merely a consequence of the increased number of subscribers which would as it is result in increase of number of complaints. Therefore, adding an additional establishment in the form of an Office of Telecom Ombudsman will not serve the requisite purpose.

**Our Recommendation**

- 3. There is no need for revisiting the option of establishing an office of Telecom Ombudsman as despite the increase in customer base over the years, the number of complaints have remained static and well below the benchmark set by the Authority.**