

10<sup>th</sup> June 2014

**Shri A Robert J Ravi**  
**Advisor (QoS)**  
**Telecom Regulatory Authority of India**  
**Mahanagar Doorsanchar Bhawan,**  
**Jawahar Lal Nehru Marg,**  
**New Delhi – 110 002**

**Subject: TRAI Consultation Paper on Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services.**

Dear Sir,

Please refer to the TRAI's Consultation Paper No. 04/2014 dated 21<sup>st</sup> May 2014 on Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services, wherein comments of stakeholders have been invited.

In this regard, please find enclosed the response to the Consultation Paper from Bharti Airtel Ltd. for your referece.

We trust our submissions will be favorably considered by the Authority.

Thanking You,

Yours faithfully,  
For **Bharti Airtel Ltd.**



**Ashwani Rana**  
**Chief Regulatory Officer - Operations**

**Encl: a/a**

**Airtel Response to TRAI Consultation Paper on Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services**

**Introduction:**

The quality of service provided by the service provider is an important determinant for a customer's choice of service provider in a multi-operator environment. Quality of services is one of the key differentiators, especially so when tariffs are almost comparable across service providers given the dynamics of the market they have to compete in.

Given the high level of market competition in India today, service providers continuously work towards betterment of network and customer service quality parameters in order to acquire new customers and retain existing ones to grow their market share. From a brand perspective, this goes a long way in delivering the promise to the customer and helps in tangible growth of the brand.

While service providers put in their best efforts to maintain / exceed the minimum quality of service benchmarks, it is opportune that TRAI is considering review of some of the parameters for Basic (Wireline) and Cellular Mobile Services.

Presently, for some of the parameters the benchmarks require 100% achievement which is an idealistic scenario and cannot be achieved due to practical difficulties which at times are beyond the service provider's control – these facts have been duly recognized and is the rationale for the initiation of this Consultation. In view of these complexities which we have explained in our response to the various questions in the consultation, it is earnestly requested that there should not be any parameter which has 100% benchmark mandated in the regulation. Instead, we would suggest that a maximum of 98% be kept which is realistic and achievable considering the different challenges, constraints that service providers have to face. This notwithstanding, service providers assure that they will closely monitor how they can improve upon the quality parameters so that customer satisfaction levels can be enhanced and there is closure of all cases within realistic timelines which can be achieved.

We give below our responses to the questions raised in the Consultation Paper released by TRAI:

**Question 1: In your view, does the benchmark for the parameter "Fault incidences (No. of faults/100 subscribers/ month)" for Basic Telephone Service need revision? If so, what should be the benchmark? Please give your comments with justification.**

**Airtel Response:** As noted by TRAI in the Consultation Paper, there are various practical difficulties which service providers face leading to faults which are caused due to factors beyond service provider's control. Some of these challenges are heavy rains during monsoon season and poor drainage system leading to flooding, delays in granting of permissions for network restoration work, cable cuts by other operators due to their network expansion activities, development work of road expansion, metro rollout in different parts of the city (there are many cities where Metro work is underway), etc leading to damage of underground cables of service providers. Apart from these reasons, faults could be attributed on the customer's side as well for issues such as CPE faulty (where CPE is owned by customer), internal



wiring issues, pirated operating systems, cookies, virus, etc. Despite all these factors, service providers' try to minimize the faults on best effort basis.

Considering these limitations, we agree with the suggestion for revising the benchmark and suggest that the benchmark for this parameter be reduced to  $\leq 10\%$ .

**Question 2: In your view, does the benchmark for parameter "Fault Repair by next working day" for Basic Telephone Service need revision? If so, what should be the benchmark for faults repaired by next working day and by 3, 5 or 7 days? Please give your comments with justification.**

**Airtel Response:** In addition to factors affecting Fault incidences as mentioned in our response for Question 1, following are the challenges in repairing the faults by next working day, by 3,5 or 7 days:

- Customer availability at home,
- Repeated re-scheduling of appointment time by customer,
- Delay in permission for digging,
- Cable Theft, Cable Burnt,
- Approval time to procure the - material consumption in some areas on account of repeated cuts damage, Theft, Burnt etc,
- Network Impacts due to repeated cuts,
- No action by concerned authorities to process pending approvals in a timely manner.

Considering the above constraints, we agree with TRAI's proposal of revising the benchmark for this parameter as: By next working day  $\geq 70\%$  and within 3 working days: 80% with a minor consideration of 98% repair within 5 working days. It will be extremely difficult to meet 100% benchmark for fault repair in 5 days as there may be some extraneous factors beyond service provider's control which could result in delay beyond 5 days.

**Question 3: What are your views on relaxing the benchmark for parameter "Mean Time to Repair (MTTR) to  $\leq 12$  Hrs" for Basic Telephone Service? Please give your comments with justification.**

**Airtel Response:** We are committed to monitor the performance of all QoS parameters on regular basis and fixing the complaint within the TRAI specified timeline is our topmost priority. However, there are certain cases, wherein repair time is not in our control i.e complaints requiring Government permission, faults lying on busy and critical road section, floods, rains, local issues, government projects of road widening, Elections etc. which leads to high MTTR. In some cases, a single instance of non-compliance, affects and distorts the entire efforts put in to meet the customer satisfaction.

In the view of above, we suggest to keep benchmark as  $\leq 8$  Hrs for 90% cases or  $\leq 12$  Hrs for 98% cases. This parameter should also factor the time of the day when the complaint is logged by the customer as well as the working hours which are available to the service provider to repair the fault.



**Question 4: What are your views on removing the parameters for Basic Telephone Service (a) Call Completion Rate within a local network or, (b) Answer to Seizure Ratio (ASR) from reporting of compliance to TRAI? Please give your comments with justification.**

**Airtel Response:** We agree to TRAI's view that with reduction in landline telephones, sufficient exchange capacity exists in TSP's network and there are no more technical constraints in meeting the parameter.

Therefore, as suggested in the Consultation Paper, we agree with the Authority's proposal to discontinue reporting of the parameter "Call Completion Rate" however monitoring of this parameter is to be sustained. We assure TRAI that by withdrawing this parameter, the customer experience will remain un-impacted.

**Question 5: In your view, does the benchmark for parameter "Resolution of billing/charging complaints" for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.**

**Airtel Response:** The existing benchmark for this parameter is 100% within 4 weeks for Basic Telephone Services and Cellular Mobile Telephone Service. In this regard, we would like to state that there are certain unforeseen reasons such as technical problems in the system or customer un-reachability which results into delay in resolution of complaints beyond 4 weeks in few cases. Since the benchmark for this parameter is 100%, therefore these few genuine cases result into not meeting the benchmark. Therefore, we propose to revise the benchmark for parameter "Resolution of billing/charging complaints" for Basic Telephone Service and Cellular Mobile Telephone Service to 98% within 4 weeks.

**Question 6: In your view, does the benchmark for parameter "Period of applying credit/ waiver/ adjustment to customer's account from the date of resolution of complaints" for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.**

**Airtel Response:** The existing benchmark for the parameter "Period of applying credit / waiver/ adjustment to customer's account" is 100% within 1 week of resolution of the complaint. It has been our observation that this benchmark could not be met for some cases due to technical issue wherein the credit posted into customer account fails and requires IT assistance in rectification and subsequent re-posting of the waiver goes beyond the specified 7 days benchmark.

Further, as per the company's internal process, depending on the waiver amount in some cases, the approval for waiver posting is vital which sometimes results in delays as the period of 7 working days is less - this may happen in case of corporate customer accounts where the waiver amounts may be high.

Therefore, we propose to revise this benchmark to 95% within 1 week of resolution of the complaint.



**Question 7: In your view, does the benchmark for parameter “Percentage of calls answered by the operators (voice to voice) within 60 seconds” for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Can the ‘Percentage of calls answered by the operators (voice to voice)’ be made within 90 seconds instead of 60 seconds? Please give your comments with justification.**

**Airtel Response:** There are a number of challenges in meeting the benchmark for the parameter “Percentage of calls answered by the operators (voice to voice) within 60 seconds”. This is entirely driven by the capacity at various call centers and a robust forecast process. Some of these are mentioned below:

- It has been our experience that the attrition rate of customer care agents at the call centres is very high i.e. upto 30%, which poses massive challenge in maintaining the required capacity at call centers at all times. Also, absenteeism of the agents is very high specifically during various festival seasons and examination period.
- Apart from the capacity issue, there are other unforeseen instances wherein the call center operations are disrupted. For example, during recent elections, service providers were forced to shut down their call center on Election Day in one of the service areas.
- Due to number of strikes / protests and Bandhs called by either State government or other political / social organizations like we witnessed recently in case of Bandhs in Telengana, curfew in J&K service area, etc, the agents are not able to report at the call center thereby affecting the count of call centre agents answering customer calls.
- Attendance in Call centers is also impacted during monsoon/winter season in certain parts of the country due to heavy rains, floods, fog, snowfall and such seasonal disruptions / natural calamities like floods, etc for which any kind of forecasts will not hold good thereby impacting capacity at the Call Centre to answer / receive calls.
- The call centre traffic forecast is done approximately 1 quarter in advance in a scientific manner given the normal traffic conditions and projected customer growth so that the Call Centre is able to gear up with the forecasted increase in traffic volume. However, despite this traffic forecasting and adequacy in number of agents who will handle the traffic, there may be an unforeseen spike for some time owing to new products that get launched in view of the market dynamics (competition launching schemes / offers / products which need to be matched) or customer behavior which cannot be predicted resulting in increased calls from customers – hence the forecasting of call volumes goes awry and we are unable to meet the benchmarks. This problem gets accentuated if other factors like strikes, floods / heavy rains, etc happen which results in reduced attendance at the Call Centre.

In view of the above, we would like to state that only due to 2 - 3 days of disruption in the call center operation on account of the above mentioned challenges, we tend to miss the current benchmark for the entire quarter.



Therefore, it is proposed to revise the benchmark for this parameter similar to broadband parameter to "> 60% calls to be answered (voice to voice) within 60 Seconds at Level I and > 80% calls to be answered (voice to voice) within 90 Seconds at Level II."

**Question 8: Shall the benchmark for parameter "Termination/ closure of service" for Basic Telephone Service and Cellular Mobile Telephone Service be revised? If so, what shall be the revised benchmark? Please give your comments with justification.**

**Airtel Response:** The existing benchmark for the parameter "Termination/ closure of service" is 100% within 7 days for Basic Telephone Services and Cellular Mobile Telephone Service. There are challenges faced in meeting the benchmark of 100% within 7 days as 7 days period is too short for making retention efforts and also towards recovery of CPE (in case where the CPE is our property).

Apart from this, the disconnection command in the system sometimes does not get successfully executed in certain cases due to various reasons like for example, the disconnection command does not get executed if any other customer initiated request related to service provisioning or account updation is pending in the system. Such failure of disconnection commands also lead to not meeting the benchmark of 100% within 7 days. Therefore, we propose to revise this benchmark to "95% within 7 days of the customer request".



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