

To,

The Advisor (QoS)
TRAI, New Delhi

Sub. : Comments on TRAI Consultation Paper on “Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services” .

TRAI issued consultation paper on 21.05.2014 on the aforesaid subject and asked the various stakeholders to comment on the issues mentioned in the consultation paper. The following is submitted for consideration to TRAI:

- MTNL provides Basic and Broadband Telecom services through underground/ Duct, Paper core/ Jelly filled cables.
- Underground Cables are frequently damaged during the process of development works undertaken by various Government civic/ development agencies.
- The underground and duct cables are frequently stolen by antisocial elements and restoration takes longer time due to delayed digging permission from local authorities in time and various other constraints.
- Most of the cables are very old having many joints resulting in low insulation problems, which in turn, puts barrier to provide satisfactory service.
- Additionally, Mumbai is lying within Sea, salty water is always available even on 6” deep in most of the places, and due to this most of the underground cables are getting corroded in fair seasons also resulting in sudden cable faults.
- **Comparison with other Private Operators for Land Line services is not appropriate here because of the following:-:**
 - a) In addition to above reasons and the fact that other private operators have their connections mostly either on Optical Fibre or on wireless , private operators are not affected on a significant scale by multiple diggings by various Civic/ Development agencies, and therefore, they do

not need to go to them time and again for digging permissions which could very adversely delay the repair. Whereas MTNL's land line connections are mostly on old Underground cable.

- b) The fact that Optical Fiber itself is not prone to theft as compared to U/G Copper Cables.
- c) The fact that Private Operators Do Not Provide connections to all & sundry unlike MTNL, which being a PSU, does indeed provide connections everywhere as a Social Obligation being its main criteria. In fact, Private Operators provide connections on pick & choose basis to Corporate customers in large buildings only, whereas, MTNL has to broad base its customers on all classes irrespective of whether it is economically viable or whether they stay in large buildings or hutments, & slums where no proper underground cable network on long term basis can be laid, and hence, being long overhead cables/wires in these narrow lanes, these are prone to frequent faults and many times difficult to repair within norms.
- d) Wherever customer want a connection, MTNL book it and in few cases it is not feasible to provide the connection within prescribed time limit. In these cases, it requires cable laying, retrieval of cable pair etc. which depends on permissions by Municipal, Traffic authorities etc.
- e) MTNL being PSU, cannot straight way buy from open market, as MTNL has to follow the lengthy procurement procedures established by Government. This sometimes affects QoS. This is more observed during recent times due to adverse financial condition of the company and sometimes because MTNL has shortage of material because of delay by suppliers/vendors.
- f) Due to above reasons and during the event of major breakdowns, lot of calls land on call centre and there is delay in answering and it becomes difficult to achieve the parameters of calls answering within specific periods.

In view of above, it is submitted that MTNL units are not able to comply/achieve the TRAI issued benchmark values for some parameters in the reports in spite of all out efforts.

Further, the point wise submission to issues raised in Consultation paper is as follows:

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.

MTNL Reply: Kindly refer point (1) of the annexed table.

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.

MTNL Reply: Kindly refer point (2) of the annexed table.

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

MTNL Reply: Kindly refer point (3) of the annexed table.

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.

MTNL Reply: Kindly refer point (4) of the annexed table.

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.

MTNL Reply: Kindly refer point (5) for Basic service and point (9) for CMTS service, of the annexed table.

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.

MTNL Reply: Kindly refer point (6) for Basic service and point (10) for CMTS service, of the annexed table.

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.

MTNL Reply: Kindly refer point (7) for Basic service and point (11) for CMTS service, of the annexed table.

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?

MTNL Reply: Kindly refer point (8) for Basic service and point (12) for CMTS service, of the annexed table.

Besides the above submission for Basic and Cellular services it is requested that TRAI may consider the below submission of MTNL for QoS parameters revision in reference to Broadband services through Fixed wireline also, in view of the reasons enumerated above:

S.No	Parameter	TRAI Benchmark (existing)	PROPOSED BENCHMARK VALUE
1	Service provisioning	100% within 15 days	95% within 15 days
2	Fault Repair by next working day	≥ 90%	≥ 80%
3	Fault Repair within 3 working days	≥99%	≥ 95%

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Encl. :a/a

S. No.	PARAMETER	TRAI BENCHMARK VALUE(EXISTING)	REVISED BENCHMARKS PROPOSED TO TRAI	REASONS FOR NON-COMPLIANCE FOR BENCHMARKS
BASIC SERVICE				
1	No. of faults/100 Subs./Month (BASIC)	<=5%	<=10	<p>(1) During rainy season, number of fault increases due to old underground cable with low insulation.. It is also established fact that the number of fault rises during raining season due to seepage of water in the cable and difficulty in carrying out the repair and maintenance work at that time.</p> <p>(2) Theft of DPs and cables by unknown antisocial elements and subsequent delay by local government agencies in providing permission for digging .</p> <p>(3) Frequent Damage of underground cable network during the process of development work undertaken by various govt/semi govt/ private Agencies, over which MTNL has no control..</p> <p>(4)MTNL has Old legacy network of PCUT cables which are prone to faults and having many joints resulting in low insulation problem.</p> <p>(5) Faulty concealed wiring done by subscribers.</p> <p>(6) Delay in tracing of fault due to road widening and construction of flyover</p> <p>(7) The duct manholes are filled with water all the times, making the cable maintenance work more difficult.</p> <p>(8)In Mumbai area due to availability of salty water at 6" deep in most of the places, the underground cables are subjected to corrosion resulting in sudden cable fault.</p>
2(a)	Fault repair by next working day(BASIC)	>=90%	>=70%	<p>(1) During rainy season, number of fault increases due to old underground cable with low insulation. It is also established fact that the number of fault rises during raining season due to seepage of water in the cable and difficulty in carrying out the repair and maintenance work at that time.</p> <p>(2) Theft of DPs and cables by unknown antisocial elements and subsequent delay by local government agencies in providing permission for digging extends the time for repairing. .</p> <p>(3) Frequent Damage of underground cable network during the process of development work undertaken by various govt/semi govt/ private Agencies, over which MTNL has no control. Further the repair work gets delayed due to delay in permission by various civic agencies. Moreover this is very labor intensive job and manual work is involved.</p> <p>4)MTNL has Old legacy network of PCUT cables which are prone to faults and having many joints resulting in low insulation problem.</p> <p>(5) Faulty concealed wiring done by subscribers which is not in the control of MTNL.</p> <p>(6) Delay in tracing of fault due to road widening and construction of flyover</p> <p>(7) Subs premises closed during office hours.</p> <p>(8) delay in fault tracing because of non-cooperation of local civic bodies.</p> <p>(9) The duct manholes are filled with water all the times, making the cable maintenance work more difficult.</p> <p>(10) In Mumbai area due to availability of salty water at 6" deep in most of the places, the underground cables are subjected to corrosion resulting in sudden cable fault.</p>
(b)	by next 3 days	100.00%	>=80%	
©	by next 5 days	>=100%	>=90%	
(d)	by next 7 days	NA	95.00%	
	by next 15 days (PROPOSED CATEGORY)		99.00%	
3	Mean Time To Repair (BASIC)	<=8 hours	<=12 hrs	Justification is same as per S. No 2 above.
4(a)	CCR with in local network	>=55%	Parameter may be dropped.	As the switching capacity of MTNL is sufficient to handle the traffic and MTNL is achieving the benchmarks. As mentioned in Consultation Paper, all operators are meeting benchmark for this parameter, hence being a redundant parameter it may be dropped from the list of QoS benchmark parameters.
(b)	ASR (Answer to Seizure Ratio)	>=75%		

BASIC SERVICES

5	Resolution of Billing/ charging complaints	100% within 4 weeks	90% within 4 weeks and 100% in 8 weeks	1
6	Period of applying credit/ waiver/ adjustment to customer's account from date of resolution of complaint	100 % within one week of resolution of complaint	95%	The resolution of complaint is done within 7 days, but credit adjustments can be done in the next billing cycle only. Also for some unforeseen reasons the request for revision may be considered.
7	percentage of calls answered by the operators (voice to voice) within 60 seconds	>=90%	>=60%	During the major breakdown due to the reasons enumerated at Sr No 1, more calls land on call centre and there is delay in answering it. Also as the benchmark value for this parameter for Broadband services is >=60%, therefore the value for this parameter may please be revised as requested in line of broadband services.
8	Termination / Closure of service	7 days	>=90% in 7 days and 100% in 15 days.	Due to customer retention effort/ recovery of CPEs/ settlement of billing. The period should start from the date of clearance of all dues on the part of subscriber.

CMTS SERVICES

9	Resolution of Billing/ charging complaints	100% within 4 weeks	95% within 4 weeks and 100% in 8 weeks	The complaints which pertains to period up to three months old only, shall be categorised under the purview of this category. As for complaints related to earlier period requires old database to be referred which requires more time for processing, hence the same shall be resolved on best effort basis only.
10	Period of applying credit/ waiver/ adjustment to customer's account from date of resolution of complaint	100 % within one week of resolution of complaint	95% in one week and 100 % in 15 days.	For postpaid services, the resolution of complaint is done within period mentioned at 9 above. The adjustment is applied within 7 days, however customer shall be able to see the affect only in the next bill. Also for some unforeseen reasons like IT outages, revision may be considered.
11	percentage of calls answered by the operators (voice to voice) within 60 seconds	>=90%	The parameter may be revised to "percentage of calls answered by the operators (voice to voice) within 90 seconds"	The parameter may be revised to "percentage of calls answered by the operators (voice to voice) within 90 seconds". Additionally there should be one time exemption in penalty in a year.
12	Termination / Closure of service	7 days	>=90% in 7 days and 100% in 15 days.	Due to customer retention effort/ recovery of dues/ settlement of billing. The period should start from the date of clearance of all dues on the part of subscriber.

