

CHAPTER-3 ISSUES FOR CONSULTATION

Question 1: What are your views on imposing financial disincentives for? Delay in submitting audit reports of the metering and billing system and what should be the quantum of such financial Disincentives? Please give your comments with justification.

Opinion: In such cases it is better thing to impose financial disincentives up to Rs.10, 000/-

Question 2: What are your views on imposing financial disincentives for? Delay in submission of Action Taken Reports on audit observations of the metering and billing system and for providing false information or incomplete information and what should be the quantum of such financial disincentives? Please give your comments with justification.

Opinion: In case of failing to submit the action taken reports and providing false information it is better to impose fine up to Rs.50, 000/- this is a good stand

Question 3: What are your views on the proposal for audit of the CDRs for at least twice a year- three months CDR pertaining to first half year and three months CDR pertaining to second half year? Please give your comments with justification.

Opinion: Better to have 6 monthly audit systems

Question 4: What are your views on the proposal for simultaneous reporting of instances of overcharging to TRAI by the auditor, monthly progress report on the action taken by service providers on such audit observations and financial disincentives on delayed refund of such overcharged amounts? Please give your comments with justification.

Opinion: simultaneous reporting of instances of overcharging to TRAI by an auditor, and monthly progress report on the action taken by service providers is suggestible, on such audit observations and financial disincentives on delayed refund of such overcharged amounts should impose 10 times of the over charged amount

Question 5: Do you support mandating service providers to undertake a thorough analysis of each audit observations and the requirement to furnish a detailed comment on each audit observation, as proposed above, including financial disincentives for submitting audit reports without adequate, comments? Please give your comments with justification.

Opinion: Audit reports without comments quiet wrong, there should be solid comment on each audit observations failing which may consider implementing serious action by TRAI

Question 6: Do you support nomination of auditor by TRAI and appointment of the nominated auditor by the service provider? Please give your comments with justification.

Opinion: I strongly support TRAI to appoint an auditor and the nominated equal rank auditor by the service provider is good at a glance, appointed and nominated auditors both carry the responsibility of justifying the work

Question 7: What are your views on the proposal for fixing of remuneration of auditor by TRAI and what should be the quantum and methodology for computation of audit fees, in case the same is to be fixed by TRAI? Please give your comments with justification.

Opinion: TRAI has to pay the remuneration to an auditor on the basis of work and payment may be considered according to the wage scale of a contract worker when used in the service, there must be clear and strong agreement in between the auditor and the TRAI. For service location it can be made easy to pay up to 1 lakh is sufficient

Question 8: What are your views on the proposals relating to tariff plans to be covered for audit? Please give your comments with

Opinion: Limited tariff plans to impose each year by the service provider gives the auditor to cover for audit

Thanking you sir,

Yours sincerely

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Registered CAG with TRAI.