

## Comments on Draft Regulation “The Telecom Consumer Complaint Redressal Regulation (Second Amendment), 2013”

1. Reliance Communications Ltd (RCOM) is thankful to the Authority for giving an opportunity to respond on the proposed amendment to the Telecom Consumer Complaint Redressal Regulations regarding registration appeals before the Appellant Authority at Call Centres.
2. We recognize the advantages for consumers of having easy access to an Appellate Authority. However, we are not in agreement with the TRAI to have a direct registration of appeal at the consumer care as it will open floodgate of appeals and would interfere with the dispute resolution mechanism.
3. The Authority would appreciate that appellate authority is supposed to decide on the resolution passed by the call centre executive. The mandate of the appellate authority is to ensure that the customer grievance is heard in an unbiased manner and redressal is not denied on a flimsy and useless ground. The proposed process of registration of complaint by the same call centers which has heard the grievance at first level would not be consistent with the objective of unbiased hearing.
4. The Authority would appreciate that if the consumer care starts registering the appeal directly, then many consumers would seek the option of registering their appeals to the Appellate Authority. This would result in tremendous increase in appeals before the Appellate Authority. This would make it almost impossible to handle such large number of appeals by a single appellant authority. **Thus the proposal is likely to bring huge cost and administrative implications upon the operator and may slow down the process of delivering decisions at appellant authorities.**
5. As submitted above registration of appeals at call centres would result in deluge of appeals and may require multiple appellant authorities. Due to increase in complaints with the Appellant Authorities it would be difficult for Authorities to meet the specified SLA in the Regulation. As a result even more pressing appeals of aggrieved consumers would lose the precedence which is deserved.

6. The option of providing the Appellate desk at Customer Care will lead to increase in call volumes and in the bargain will result in appeals even on flimsy grounds.
  7. **In view of the above suggest that no change is required in the current mechanism of lodging an appeal before the Appellate Authority. These Authorities should continue to work on standalone basis and as a separate independent entity the way these are working now.**
  8. **In case TRAI still believes that registration of appeals at call centres is required then we propose that the customer must be asked to provide the "SR ID" to authenticate the appeal at tier-2 level. This will enable only the genuinely aggrieved customer in reaching the Appellate.**
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