



VIL/LT/13-14/323
14th Aug 2013

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg,
New Delhi-110002

Kind Attention: Shri A. Robert J. Ravi-Advisor (CA & QoS)
Subject: Draft Amendment to Telecom Consumers Complaint Redressal Regulations, 2012.

Dear Sir,

This is with reference to the Draft Amendment to Telecom Consumers Complaint Redressal Regulations, 2012.

We are pleased to submit our comments and views on the above captioned amendment (attached).

Thanking you

Yours sincerely,

For Vodafone India Limited, Vodafone Mobile Services Limited, Vodafone West Limited, Vodafone South Limited, Vodafone Digilink Limited, Vodafone Cellular Limited, Vodafone Spacetel Limited and Vodafone East Limited.

A handwritten signature in blue ink, appearing to read 'Sundeep Kathuria', is located above the printed name.

Sundeep Kathuria
EVP- Regulatory Affairs
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Vodafone's response to TRAI's Draft "Telecom Consumers Complaint Redressal (Second Amendment) Regulations, 2012"

We observe from the Explanatory Memorandum to the **Draft "Telecom Consumers Complaint Redressal (Second Amendment) Regulations, 2012"** that the Authority has expressed concerns on issues related to accessibility and awareness in respect of the Appellate Authority. Further, the said Explanatory Memorandum indicates as if the accessibility to the Complaint Centre is currently only via telephone lines.

We wish to bring to the kind attention of the Authority that that multiple modes/channels are existing for our subscribers to express his complaints in Complaint Centre which are as follows :-

1. Call Centre 198 & 10 digit number (for external)
2. Walk in to our complaint centres
3. Walk in to any Vodafone Store
4. Letter (through post/courier/personal visit)
5. E-mail (email address is provided on SUK, Bills and Website)
6. Fax (number is provided on SUK, Bills and Website)
7. For UCC complaints 1909

Similarly, in respect of appeals also, the customer can file the same via e-mail, post/courier, fax, walk-in to our complaint centres. The details are to be given in a structured format to facilitate redressal.

Further, the information regarding the Complaint Centre and the Appellate Authority is amply publicized to the customers via the various methods like:

- a) Information on SUK
- b) Bill
- c) Website

Advertisements in Newspapers Additionally, we also inform the customers regarding the process of complaint redressal mechanism and appellate authority in our replies sent to the customers, so that they can contact the next level, in case they are not satisfied with the resolution given at the call centre level. This clearly indicates that customers are well aware regarding the various levels for the complaint redressal mechanism. This process of informing the customers regarding the mechanism of complaint redressal is available since last many years.

The Authority has observed in the said Explanatory Memorandum that in spite of a large number of complaints not redressed or resolved at complaint centre level, no appeals are received by the Appellate Authorities. We would like to submit that there exists various levels within the organization and complaints are redressed and resolved appropriately. .

We respectfully submit that the customers are aware regarding the Appellate Authority and the same is easily accessible to the customers.

The Authority has proposed the following amendments in the Regulations. Our comments regarding the various draft amendments are as follows:-

Amendment 1:

In regulation 3, sub regulation (5), the following sub-regulation shall be substituted, namely:-

"Every service provider shall earmark or allot sufficient telephone lines or connections to be called "Consumer Care Number" and ensure that its Complaint Centre is accessible to its consumers in person as well as through voice call, SMS, email and post."

As stated earlier, we submit that the complaint centre is already accessible to the customers in person email, fax and post in addition to phone lines. Therefore, there is no need for any amendment in the current regulation as we are already following this practice. Further, such practices are well engrained for many years and it will not help in mandating the same since it may later result in micro-regulation which is not required at all.

In regards to the Authority's proposal of making the complaint centre accessible to the customers via SMS, we would like to submit that complaint centres work under the QoS benchmarks regulated by TRAI for call centre performance as well as turnaround time (TAT) for complaint closures.

Calls received by the call centre follow a process of discussion between the customer and the call centre agent. On the basis of the issue raised by the customer, the call centre agent accesses data of the customer's account which helps in identifying the validity of the grievance. In most instances, the issue is resolved on call only.

Similarly, all letters/e-mails/walk-ins are not necessarily complaints and therefore post screening they are tagged as queries, requests or complaints and thereafter actioned accordingly.

The draft amendment suggests that consumer care number be made accessible through the SMS as well. Due to the limitation in the character length of the SMS, the customer will not be in a position to explain the issue in its entirety. Infact, each SMS sent by the customer would entail our outcall agents to call the customer and understand the issue in detail.

We would like to respectfully submit that this may be an inefficient method of registering complaints for the following reasons:-

- 1) Customer call back will be sent to a different out-calling desk. The call back time would be 24-48 hours. This would lead to
 - a) increase in the time of resolution
 - b) even a query which can be resolved in seconds would be unnecessarily delayed.
 - c) customer may not find it convenient to receive the call from us, this will further increase the TAT.

- d) this will lead to customer dissatisfaction.
- 2) Any message cannot be considered as a complaint. Unnecessary manpower would be required to read each SMS. There would be large number of junk messages. It would lead to agents taking decision on subjective basis, based on their understanding of the SMS content.
 - 3) There may be misuse of this by treating it as a call back facility.
 - 4) This will also require us to increase the staffing of the out-calling agents in a large number. This, we believe, will have a huge cost impact, which is inefficient and unnecessary in light of the several other channels available for the customer to register his complaint.

We therefore have genuine concerns regarding the proposal of the complaint centre to be made accessible to customers via SMS and we request the Authority that the same may not be notified. If it would have been practical, we would have followed it on our own, like we are following the other practices without any mandate from the Authority.

Amendment 2 :

In regulation 3, sub regulation (1), after third proviso, the following proviso shall be inserted namely:-

"Provided also that the Complaint Centre shall register appeal, if any, preferred by the consumer through Consumer Care Number."

In regulation 3, sub-regulation (9), clause (b), following clause shall be substituted:

"The second level of the IVRS provides the option relating to appeal and broad categories of complaints and service requests".

In regulation 9, sub-regulation (2), the following sub-regulation shall be substituted, namely:-

"A consumer may prefer an appeal under sub-regulation (1) either directly to the Appellate Authority through email or facsimile or post or in person, or through the Consumer Care Number of the complaint centre established by the service provider."

As stated above, the customer is suitably informed about the Appellate Authority and he can register appeal via e-mail, post/courier, fax, or by walk-in to the Vodafone Store or Complaint Centre.

We would like to respectfully submit that for filing an appeal, it is important for the Appellate Authority to know, in detail, why the customer is not satisfied with the resolution provided by complaint centre. We believe that this is only possible in a structured format where the relevant dates and other information is required.

Our call centre agents have been trained to resolve the complaints and the effort is towards immediate resolution which is important for overall satisfaction of the customer. .

In case, the Authority mandates that appeal shall be registered at the complaint centre level, we foresee the following concerns:-

- The appeal registration is different from the complaint redressal and the mechanics, skill sets, time required, details required and other parameters vary significantly. The required parameters or skill sets will not be available at the complaint centre.
- This, we respectfully submit, will have impact on the current processes which have been built over a period of time to cater the subscriber base and any change therein of this kind will lead to costs and service implications, which aspect has not been considered in the Explanatory Memorandum.
- Appeal filing and handling is a separate process to be handled by the Secretariat. The complaint centre cannot be given responsibility of the Secretariat since complaint centre is part of the service provider.
- The differentiation between complaint and appeal must be kept and a proper balance between the two has to be maintained. It should not be the case that the processes or the interactions reach to such commonality that the differentiation is lost. This will demean both the complaint centre and the appellate authority and will lead to more confusion in mind of customer and more dissatisfaction.
- Currently, the defined timeline for the appeal process is 39 days. The call centres do not have access to the appeal process and status, which is an independent process. In case any part of appeal registration is handled by complaint centre then it will result in calls for appeal status update in complaint centre and in absence of any further information, it will lead to customer dissatisfaction. This will further require service provider to increase in the resources and will lead to cost increase without any benefit to the customer.
- It would lead to an increase in superfluous calls.

Therefore, we earnestly request that that the service providers should continue to accept appeals only through letter, e-mail, fax, post/courier and further request the Authority to not to mandate any further requirement like accepting appeal through the voice agent at the complaint centre.

We hope you will agree to the above. In case the Authority has a different view then we request for a personal hearing on this important matter.

Vodafone

14th Aug 2013