



Ref. No. TTL/TRAI//T-70/2015
21st September- 2015

Smt Vinod Kotwal
Advisor (F&EA)
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg, Old Minto Road, New Delhi – 110 002

Subject: Response to TRAI Consultation Paper on Compensation to the consumers in the Event of Dropped Calls

Dear Ma'am,

This is in reference to Consultation Paper No. 4/2015 dated 4th September 2015 on Compensation to the Consumers in the Event of Dropped Calls.

As desired, we hereby enclose our comments to the questions raised in your above-mentioned consultation paper. We sincerely hope that our views would be given due cognizance.

Thanking you and assuring you of our best attention always.

Yours sincerely,


Satya Yadav
Addl. Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
Tata Teleservices (Maharashtra) limited

Enclosure: As above

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TTL Response to Consultation Paper on Compensation to the Consumers in the Event of Dropped Calls

Question1: Do you agree that calling consumers should not be charged for a call that got dropped within five seconds? In addition, if the call gets dropped any time after five seconds, the last pulse of the call (minute/second) which got dropped, should not be charged. Please support your viewpoint with reasons along with the methodologies for implementation.

TTSL Response: Not charging the customer for a call that got dropped within five seconds is not desirable. Both mobile connection and an initiation of a call costs to TSP. If the call is dropped in less than five seconds, it would have used extensive network resources already of the originating and called TSPs. It is in TSPs interest to let the call continue as no TSP would afford the dropping of call within five seconds.

Similarly, any TSP would desire that the same calls continue for much longer duration having used its signaling and other authenticating resources initially.

Quality of Service (QoS) is not only a part of our License conditions but we consider and operate by engaging ourselves in continuous quality improvement as we deem QoS to be very important for their competitiveness in the market. For monitoring the quality, regular tests are carried out, which help us in benchmarking ourselves against competitors. The dropped-call rate is one of the key performance indicators (KPI) used by us as a TSP to assess the performance of our networks as it has a direct influence on the customer satisfaction

We aim at reducing the calls dropped in the network as much as practical and affordable by improving radio coverage, expanding the capacity of the network and optimising the performance of its elements and all these do require considerable efforts, continuous and significant investments on the part of TSPs.

Therefore, as a network management best practice, it is in our interest that the initiated call is materialized and completed in the first attempt itself and call drops are minimized. It is brought out that call drops (in-spite of our best endeavour and efforts mentioned above) mostly occur due to reasons which are beyond our control. Some out of those extraneous eco-system and other reasons are mentioned below (Despite of our own actions of optimization):

State bodies initiate actions against the towers; Restrictions imposed by State Governments and Municipalities; Issues pertaining to Right of Way (RoW); Frequent fiber cuts due to other infrastructure projects; Site outages on account of long power failures; Owners/legal issues; Stringent emission norms etc. as explained in earlier interactions with TRAI and the authorities. Customer's unpredictability of sudden movement into certain fringe and shadow areas also add to call drops in some cases.

It may be noted that a TSPs also get financial disincentives in any case, if they fail to meet the performance benchmark laid by the Authority. Also, the fraction of split second time duration of call charges would give rise to huge billing complains based on timing perception of the complainant

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Question 2: Do you agree that calling consumer should also be compensated for call drops by the access service providers? If yes, which of the following methods would be appropriate for compensating the consumers upon call drop?

- (i) Credit of talk-time in minutes/ seconds**
- (ii) Credit of talk-time in monetary terms**
- (iii) Any other method you may like to suggest**

Please support your viewpoint with reasons along with the methodologies for implementation.

TTL Response: We don't agree that TSPs can compensate the Consumer for call drops. Call drops mostly occur due to reasons which are beyond TSPs' control as explained in response to Question no 1. Moreover such compensation will lead to increase in number of billing related complaints from the consumers, will also add further into the stretched balance sheets of the operators and may act as deterrent to investment in the infrastructure required to improve the services.

Question 3: If the answer to the Q2 is in the affirmative, suggest conditions/limits, if any, which should be imposed upon the provision of crediting talk-time upon call drop and usage thereof.

TTL Response: No Comments.

Question4: Is there any other relevant issue which should be considered in the present consultation on the issue of call drops?

TTL Response: In addition to our stated response to Question no 1, we would like to emphasize that maintaining and improving the QoS is a continuous process and it is our earnest request and suggestion that the Government as well as TSPs work together mutually on the challenges discussed many times between the two sides.

A handwritten signature in blue ink, appearing to be 'A. Chawla', with several diagonal lines drawn over it.