

Comments on Consultation Paper on “Review of measures to protect interest of consumers in the telecom Sector”

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Issue 5.1) This benchmark can be deleted as there is no shortage for landline telephones.

5.2) It will be wiser if the authority remove the benchmark for the parameter from mandatory compliance as the present service providers are running after consumers.

5.3) Fault repair must be instant. Quick action is the need of the hour. Business hours shall be 24 hours a day or round the clock. Need for separate benchmark for urban areas and rural and hilly areas shall be dispensed with. Service provider must opt for suo-motto rent rebate, after 24 hours delay in rectifying the fault. Once the number portability is introduced, delayed fault repairs may force consumers to change their service providers. This can act as a deterrent for delayed fault repair.

5.4) Subscribers shall have the option for adjusting the rebate from their bills. At present rebate is not given for the first 2 days. This shall be deleted and rent rebate shall be from day two onwards.

5.5) Make the rebate payment mandatory.

5.6) Remove this parameter as suggested in the QS Regulations 2009 from mandatory compliance as enforcement of number portability can ease the situation.

5.7) The modified provision for termination of service (2.20 i-iv) can be accepted in total.

5.8) Explicit consent of the customer in any form, acceptable to service provider, is a must.

5.9) The time period of 4 weeks provided for resolution of billing/charging complaints is not at all reasonable because all service providers are using computerized accounts. So the periods can be reduced to 1 or 2 days.

5.10) We cannot agree with the present provisions regarding a period of 1 week. It shall be done on the same day, as the bills are computerized.

5.11) The argument that time is needed to find out roaming charges etc is far from reality. Refund of deposit etc must be done atleast on the second day.

5.12) Increase the interest rate for the delayed payment from 10% to 20% after 24 hours.

5.13) In the present lethargic administrative setup and absence of competition and non-readiness of service providers “service provisioning/activation time” by BSNL takes more than 15 days. Encouraging competition the time delay can be reduced considerably.

5.14) Broadband setup must be made an independent wing. In majority of places old telecom wiring (lines) in the subscriber premises leads to poor quality of broadband reception. This calls for up gradation of technology.

5.15) Rebates to be paid to broadband subscribers must be doubled or shall be in proportion to the financial loss incurred by the subscriber.

5.16) The audit of all plans whether covered or not covered as per present provision in the current audits is a must by taking random samples. Otherwise service providers may opt for ways to exempt the plans, where maximum unfair trade practices are carried out. Copies of inadequacies pointed out by the agencies and the action taken report by service providers may be sent to media for publication.

5.17) Subscribers are totally unaware of about the premium rate services, which are never fixed, changing even over night. Printed information pamphlets on premium charges must be given to pre and post paid customers. At present restricted, unfair and fraudulent charges are on the

increase only. Alert messages or announcements through IVR will be of help only if vernacular language is opted. Majority being illiterate and destitute 85% of Indian population are cheated on a day to day basis.

5.18) Information related to last call duration, call charge, validity period, and account balance excluding announcements of their special recharges, packages must be displayed for sufficient long time duration so as to enable one to read it fully. Include facility for obtaining information by sending SMS or toll free number.

5.19) Immediately after recharging/top up of prepaid connection, no fixed fee other than applicable taxes and Rs.2 per top up charge shall be charged on recharging, as mandated by TRAI. However at present coupons are provided for Rs.55 and Rs.110 for values worth Rs.50 and Rs.100 respectively in Kerala. Also electronic charging/top up for any amount is done any where at special rates. It is regretted that sale bills are not provided. Unfortunately TRAI mandates are ignored. Who can be of help in enforcing TRAI mandate?

5.20) The awareness about the call centres can be increased only through the vernacular medium by conducting classes at village levels and distributing awareness pamphlets. Also the need arises in educating the retailers of SIM cards etc. Call centre information can be printed on mobile bills for post paid customers. Copies of TCPRG regulations in vernacular languages should be kept at retail counters of all service providers. A common number for wire line, mobile and broadband call centres can be introduced soon after mobile and land line number portability is introduced. Above all partnership with CAG members must be mandatory in awareness creation.

5.21) By imparting proper training to the operators of call centres by service providers and CAGs.

5.22) The location of the menu option for talking to a customer care agent in the IVR system should be the first sub menu at the third layer.

5.23) Yes, TRAI must mandate all service providers to provide complaint booking number accessible from other telecom network also using alternative number, which shall be toll free.

5.24) Docket Number should also be sent to subscriber through SMS, who is booking the complaint. The need arises to keep one complaint register with call centres and retailers.

5.25) Yes, SMS can help in increasing effectiveness of redressal.

5.26) Yes, a unique format for docket number across the service providers will increase monitoring and speedy redressal of subscriber complaints.

5.27) Yes, customers need to be informed about the status of redressal of their complaints, action taken and the results before the closure, in person as per TCPRG and net through SMS.

5.28) The only way is through continuous awareness creation among call centre staff in addition to heavy fines to the service providers as and when the bench mark records low values.

5.29) TRAI has to honour the commitments given to the committee on sub-ordinate legislation and hence the need arises for TRAI to direct the call centres itself to inform the customer about the time limit within which his complaint would be redressed. The reason for the delay if any may be informed to the customer through SMS.

5.30) Improvement of QOS and processes adopted by a service provider is possible only if TRAI monitor corrective actions, in association with CAGs. One of the ways can be encourage competition among service providers. Equally important is adoption for modern efficient infrastructure and management systems, following good business practices.

5.31) Prominent display boards can educate telecom users. Details can be included in the SIM cards also. Introduction of uniform numbers across all service providers is welcome.

5.32) Three days allowed to acknowledge is painful. It should be done instantly, as otherwise it will amount to violation of stipulation by TRAI. Further delay in redressal will multiply the complainant's agony.

5.33) If nodal officer can give an indicative time for redressal it can boost consumer confidence.

5.34) It will be certainly possible to redress the grievance in time.

5.35) A nodal officer with commitments can accomplish timely disposal of consumer grievances.

5.36) The accessibility of nodal officers can be improved by increasing the number of nodal officers or reducing the number of grievances before him by solving them at the call centre itself.

5.37) Only through monitoring by CAGs.

5.38) CAGs can try for feed backs from subscribers.

5.39) Instant redressal from nodal officers.

5.40) Impose heavy fines for non- redressal.

5.41) Regular analysis of consumer grievances at nodal officer level can be monitored through CAGs who can suggest solutions to rectify systemic failures.

5.42) Toll free facility for approaching the nodal officer shall be mandatory. Liberal compensation must be paid to the consumer for the inordinate delay.

5.43) Enhanced awareness creation about Appellate Authority to ensure effective redressal of consumer grievances can be vested with CAGs. Also award of compensation to the consumer shall be made mandatory.

5.44) Seek the help of CAGs

5.45) Acknowledgement of appeal by allotting a unique appeal number shall be done instantly.

5.46) Conveying the tentative time required for disposal of appeal may be intimated instantly to increase consumer satisfaction.

5.47) Feedback on disposal of appeal must be institutionalized to improve the effectiveness of the process.

5.48) Only, if the framework of the Appellate Authority working at present as extended areas of service providers is made an independent and impartial body, it can be an effective redressal grievance authority.

5.49) The maximum time period for deciding an appeal shall be 2/3 days instead of the present 3 months.

5.50) The time limit within which the information about itemized usage charges shall be provided as required from a pre-paid customer shall be 3 days especially because he is paying Rs.50 for 6 months data.

5.51) Further measures needed to effectively control provision of value added services without consent of the subscriber are enforcing present directions and imposing heavy fines on wrong doing service providers.

5.52) Consumer education workshops within their areas must be a fortnightly affair conducted in public/open places with proper publicity through various media. Free pamphlets must be distributed to participants.

5.53) Web based telecom consumer grievance system can be made more effective if CAGs are permitted to be a part of the web net.

A matter of concern is that BSNL still follows the hierarchy, oriented bureaucratic age old system of complaint redressal of grievances. It will be wiser if BSNL too follows TRAI's regulation.

