

To,
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VOICE comments on-

THE DRAFT STANDARDS OF QUALITY OF SERVICE OF BASIC TELEPHONE SERVICE (WIRELINER) AND CELLULAR MOBILE TELEPHONE SERVICE (SECOND AMENDMENT) REGULATIONS, 2012

Based on VOICE'S regular, broad and continuous interaction with consumers from all over India, we propose **QOS should be changed to Quality of Consumer Experience (QOE)** which is more relevant to the consumers because in today's all pervasive and fast growing communication environment, all consumers are not expected to be tech-savvy. Consumers are unable to identify with the technical QOS requirements. Consumers need requirements/parameters which can be experienced/ascertained by them.

Secondly, the Telecom Service Providers (TSPs) also need to move further from just fulfilling the Regulator requirements (mostly paper-satisfaction) to a more consumer centric QOS which is dynamic in nature.

Consumer perception is that their genuine concerns are not being addressed either by the TSP/ISP or TRAI since there is no direct 2-way dialogue between the consumer and TRAI.

And **CONSUMER DETRIMENT should be part of all QOS/QOE requirements.** Every non-performance on the part of TSP/ISP results in to monetary loss as well as lost opportunity to the consumer apart from inconvenience/sense of harassment in getting his grievances resolved which so far has never been addressed. May be this non-recognition of CONSUMER DETRIMENT and not compensating the consumers for the same is contributing to casual attitude of TSPs/ISPs towards resolving consumer complaints and consequent non-adherence to the specified QOS.

VOICE fully agrees with the concept of "Financial Disincentives" and would like it to be taken a step further by proposing that-

- 1. Financial Disincentives for repeat defaulters should be related to their revenues for the subject month/quarter/year as the case may be.**

2. **CONSUMER DETRIMENT/Compensation:** As has been highlighted earlier, Telecom services are today critical for transacting day to day business for consumers. Poor QOS/QOE leads to direct monetary losses measurable in Rs. Apart from cost of lost opportunity. Hence it is high time compensation to consumers in relation to CONSUMER DETRIMENT is introduced. This will not only be justice given to the consumer but also will be a deterrent to the ISPs/TSPs to improve their QOS leading to improved QOE for the consumer.

In conclusion, VOICE is of the view that QOS regulations now should be taken to the next level as Telecom services have matured and can start taking lead in setting international benchmarks in CONSUMER QOE.

At VOICE, we are always available to provide any clarification or further input required to improve consumer experience.

Hemant Upadhyay

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