

## [Aircel Comments to TRAI Consultation Paper on Complaints / Grievance Redressal in the Telecom Sector](#)

Aircel is pleased to offer comments to the TRAI Consultation paper on Complaints / Grievance Redressal in the Telecom sector and would be happy to explain further, should TRAI desires so.

### **Preamble:**

At the outset, we appreciate TRAI's efforts and regular initiatives to help strengthen and improve quality of redressal of consumer grievances. The telecom sector has been witnessing increase in subscriber base, which is no lesser than any global telecom growth benchmark. All this can be achieved with consumers placing trust and faith in the service quality of the telecom operators and with operators continuously reviewing their service quality and improving the same based on consumer's feedback.

We would like to make following comments before giving question-wise response to the consultation paper.

### **A. No Study conducted on proposed Ombudsman mechanism**

We would like to request the Authority that firstly a study should be conducted on the qualitative and quantitative benefits of the Ombudsman proposal in the telecom sector. In our view, public policy matters should be initiated based on strong evidence/fact based proposals, which can withstand technological advancements of the dynamic Indian telecom sector.

It is essential to have critical cost-benefit analysis of all such regulated structures being mandated at first place and as to why such structure requires base-level modifications after few years.

### **B. Existing Process:**

It is imperative to draw Authority's attention towards a brief snapshot of the existing consumer grievance redressal mechanism being put in place under TRAI's guidance and regulations:

- i. **Toll free Consumer Care number (198):** The consumer care number has been established under TRAI regulations and its performance is measured vide strict SLAs by us. User-friendly IVR tree and trained agents are its trademark and huge number of calls for complaints, queries and service requests are resolved through this consumer care number. It has been our constant endeavor to continuously improve upon the IVR functionality as well as training of agents, to suit consumer needs and resolving it at the quickest possible.

Furthermore, lot of effort is devoted into making available access of such services & systems to the agents, which would address the most relevant and desired needs of consumers at large. Considering the scale of customers approaching this level, this by itself is a humungous activity and ever evolving.

- ii. **Appellate Authority + Advisory Committees:** The industry has thrived in the past decade with telecom density increasing from 13% in 2006 to 84 % in 2016 (figures in approx). This wouldn't have been possible without the trust of the consumers and the effectiveness of the consumer grievance redressal mechanism. Having said so, it would be natural expectation from the sector Regulator for adopting a positive/pragmatic view and for giving much deserved appreciation considering the efforts being put into by the operators. The positive approach of looking at glass as half full than to be half empty, would have made the less numbers of appeals to be a sign of an effective & working consumer grievance redressal structure than to be something suspicious requiring additional layers.

It is pertinent to highlight that we have established appellate authorities in all circles with senior level officials handling the appeal and they are being advised by the Advisory committees consisting of a member from the consumer organisations registered with TRAI.

- iii. **Web based complaint monitoring system:** As per TRAI regulation, we have also implemented a web-based complaint monitoring mechanism whereby consumer can lodge complaint and track its status/resolution.
- iv. **Company stores:** We have opened huge number of stores in all service areas and are also handling consumer complaints from the walk-in customers at these stores, besides the customer acquisition and request handling.
- v. **Point of sales:** A large number of Points of sales have also been trained to handle selected type of consumer complaints, for giving quick and easy access to the consumers.
- vi. **Monitoring of complaints at social sites:** We are proactively monitoring various social and blogging sites (like Twitter, Facebook, Jago grahak etc) for engaging with the consumers, taking their feedback and resolution of their complaints. This is also

an effective mechanism considering the increased digital awareness and consumers being easy accustomed to such social mediums.

- With above structure and huge number of consumer touch points, we are handling almost 1.5 crores monthly interactions with our customers.
- Out of approx. 2.5 lakhs complaints getting logged through different channels, approx. 98% get resolved within defined SLAs.
- The appeals being logged are 0.4 % approx (i.e. 300/350 in number) of the total complaints. We request that efficacy of appeal mechanism should not be questioned without quoting facts or statistical analysis, instead it should be acknowledged that operators are putting are leaving no stone unturned in complaint resolution at the first layer, for increased consumer satisfaction. It is our ever increasing endeavor to continuously strengthen our grievance redressal touch points & mechanism, based on consumer feedback and guidance from the TRAI.
- The complaint handling teams at operators have strict KPIs for satisfactorily resolving consumer complaints.

**Therefore, keeping all above in view we verily believe that the existing process which has been established after long deliberations and huge efforts have been put for implementation and educating the consumers; it is working well and no additional layer is required to be introduced.**

### **C. Additional measures**

**Consumer workshops by TSPs:** TRAI has also asked operators to conduct consumer workshops in 25% of the total DHQs in a licensed service area in a year, translating to covering the entire service area within 4 years. These consumer workshops help TSPs build connect with the consumers and to suitably educate them about the various consumer friendly initiatives and collect feedback from them for improving systems & processes.

**Consumer workshops by TRAI:** Besides TSPs, TRAI also conducts consumer workshops regularly which are participated by TSPs and presentations are given to the consumers on the consumer friendly initiatives and grievance redressal mechanisms, implemented by TSPs. It is also an important forum to gauge consumer's feedback, to eventually improve upon systems & processes.

**Metering and Billing Audits:** TRAI is also monitoring complaint handling process vide these audits and the TRAI empanelled auditor looks deep into entire consumer complaints dump and their root cause analysis for all billing complaints. Wherever there is a need to go beyond and based on guidance from the auditor as well, TSPs are proactively giving waivers/refunds.

**Mobile Number Portability:** It is pertinent to mention that Mobile Number portability has given lot of impetus to the consumer service and satisfaction index and ensured that TSPs work beyond their traditional ways of grievance redressal, in their endeavor to reduce genuine customer port-out to other TSPs.

#### **D. Complaints received by DoT & TRAI**

During our analysis of the complaints received by DoT from Jan'16 onwards, we have noticed that almost 72% of complaints have already been resolved by our consumer care number or the appellate authority. This indicates that almost 72% of the complaints do not need any further action from operator side.

We would also like to state there is sufficient follow up and engagement by DoT to address the concerns/complaints of consumers as being received on its PG portal.

**Hence, the number of complaints being received by DoT does not form any benchmark or basis for introducing an additional layer of grievance redressal.**

#### **E. Proposed additional measures:**

- **Participative and collaborative approach:** As rightly highlighted in para 3 page 5, that the role of TRAI is “...to protect the interest of service providers and consumers of the telecom sector...”, we feel that there is a growing need for TRAI to play a more participative and collaborative role in supporting, developing and help building an improved and effective grievance redressal eco system, for both TSPs and consumers to gain together.
- We suggest that TRAI should form a committee chaired by a senior official from TRAI and with participation from senior officials of TSPs and their team. This committee should adopt a participative and collaborative approach and should generally review the complaint & IVR handling process and introduce standardization and uniformity across TSPs, to the extent possible.

The committee may also look into top complaints, escalations. With details from all TSPs, the Committee should also take up handset related problems with handset manufacturers for speedy resolution.

- We also propose that each TSP must identify one SPOC at their corporate level (not lower than a DGM rank person) to review & represent TSP at a national level. The current process does not necessitate requirement of a corporate level owner of redressal mechanism.
- **Social channels to be integrated:** In last few years, there is a significant growth of social channels being used by customers to seek attention and redressal of their grievances, and all the TSPs have already intensified their participation on these social care platforms to identify and address customer grievances. Standardization in fixing responses, resolutions and SLA/timelines for these social care platforms will be helpful. This will help build a comprehensive resolution framework encompassing all the existing service channels.
- Increase in awareness of appellate mechanism and making it consumer-friendly
- Present SLA of 39 days can be reduced suitably, to encourage consumers for going to appeal level in case not satisfied with resolution of complaints at the first level.
- Increased use of CUTCEF for consumer awareness.
- Increase registration of more number of consumer organizations, to have representation from larger geography and segment of society. Presently, only 56 consumer organizations (approx.) are registered with TRAI, for all 23 licensed service areas.

**We strongly believe that if above measures are put in place , we will be jointly able to keep an eye on customer grievance redressal as well as collectively work towards improvement & development of entire telecom service eco system thru balanced & constructive participation of all the stakeholders.**

#### **F. Ombudsman not fit for Telecom Sector**

- Nature & Number of complaints as well as the amount involved is at stark variation to the Banking or Insurance industry.
- We would like to submit that telecom today is amongst the most regulated industry with significant financial disincentives in place. We also urge TRAI to consider the volumes of

subscribers and their issues which get addressed by TSPs and which beats any other industry by many miles.

- Comparing Banking sector where very heavy financial transactions take place, with telecom where the financial value of the transactions are extremely low. Telecom is probably the only industry which still recognizes paisa as a unit, as calls are still rated in paisa. Introduction of any layer like Ombudsman will only add to more complexity with no real advantage to the redressal process.

### **Question-wise Response**

**Q1: Is the complaint redressal mechanism, as presently existing, adequate or is there a need to strengthen it?**

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**Q2: Are there any specific changes that can be made to the existing system to improve it?**

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**Q3: Should a separate - independent and appropriately empowered - structure to resolve telecom sector complaints and grievances be established?**

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**Q4: If yes, please comment with regard to the organization; its structure; kinds of complaints to be handled and its powers?**

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**Q5: Is establishing an Office of Telecom Ombudsman an option that should be revisited, especially given the experience of the past few years of increasing numbers of complaints?**

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**Q6: If yes, how should it be created – the legal framework? What should be its structure? How should it be funded? What types of complaints should it handle? What should be its powers, functions, duties and responsibilities?**

#### **Aircel Comments:**

It is our considered view that the present multi layered consumer grievance redressal system is sufficient and working effectively to deal with the consumer complaints. We urge Authority to adopt a collaborative approach in fine tuning the existing layers of grievance redressal and mechanism instead of recommending an additional layer, which will make the entire process complex and confusing for the consumers as well as TSPs.

In case Authority still wishes to pursue formulation of Ombudsman type additional layer of grievance redressal, then the cost to implement should be incurred by TRAI or DoT, without any burden of additional cost/human effort on operators.

We request Authority to read our comments given above, before the questions, as part of our comments to the questions herewith, with summary submissions as follows:

**Summary Submissions:**

1. Existing process working well
2. Additional measures also available besides 2-layer grievance redressal mechanism.
3. To fine tune further, TRAI should adopt collaborative and participative approach
4. TRAI should look into additional proposed measures and guide the industry
5. Ombudsman not fit for telecom sector
6. Conduct evidence/fact based study on effectiveness & cost-benefit analysis

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