महानगर टेलीफोन निगम लि०
(भारत सरकार का उद्यम)
Mahanagar Telephone Nigam Ltd.
(A Government of India Enterprise)
CIN: L32101DL1986GOI023501

स्वच्छ भारत
एक कदम स्वच्छता की ओर

MTNL/RA/TRAI-C.P./Grievance Redresal/2016
Dated 07.09.2016

To,

The Advisor (CA)
TRAI, New Delhi

Sub. : Comments on TRAI Consultation Paper dated 28.07.2016 on "Complaints/Grievance Redressal in the Telecom Sector".

TRAI issued Consultation paper on 28.07.2016 on the aforesaid subject and asked the various stakeholders to comment on the issues involved in the consultation paper. In this reference following comments are submitted for consideration:

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

MTNL Comments: In MTNL, in accordance with the TRAI's 2-tier system, MTNL customer can book their complaints on1500 (for Landline/Broadband), 1503 (for Mobile) & 1504 (for Broadband).

In addition, MTNL customers can also book their complaints/grievances via

- Common Helpline No.1130 for all services
- FRS No. 198 or xxxx2198(xxxx exchange code)
- SMS / Mobile App/Email
- MTNL websites
- PG Web portals of GoI& TRAI
- Social media
- In person / written complaints
- Through TAC (Telecom Advisory Committee). Following are the functions of TAC:
  a. TAC shall work as interface between telephone consumers and BSNL/MTNL.
  b. Giving the public a confidence that their grievances are properly represented and redressed.
  c. Educate public/bring awareness, among telephone consumers about the various services provided by BSNL/MTNL.
  d. To suggest measure for efficiency.

In view of above, there are multiple systems/mechanism for complaint / grievance redressal, which are available with MTNL customers. Therefore, MTNL considers that **TRAI's existing 2-tier complaint / grievance redressal mechanism is ADEQUATE**.

Q2: Are there any specific changes that can be made to the existing system to improve it?
MTNL Comments: Mobile App and social media may also be used as alternate means for registering complaint/grievance.

Q3: Should a separate - independent and appropriately empowered - structure to resolve telecom sector complaints and grievances be established?
MTNL Comments: In view of above, not required.

Q4: If yes, please comment with regard to the organization; its structure; kinds of complaints to be handled and its powers?
MTNL Comments: Not applicable in view of reply to Q3 above.

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?
MTNL Comments: As mentioned in the consultation paper itself that "amount involved in most of the consumer complaints related to telecom service is meagre", therefore, MTNL considers that the establishment of an office of TELECOM OMBUDSMAN is not an option to revisit.

Moreover, if it involves financial burden, in terms of the revenue of the service providers (say, less than 0.01%) to meet its expenses", then MTNL opposes for any revisit in this matter. If such financial burden is borne by Govt/DoT, then MTNL has no objection.

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?
MTNL Comments: Not applicable in view of reply to Q5 above.

If it is created with financial burden borne by Govt/DoT, then MTNL is in favour. And, in such a situation, following comments may be considered :

(a) how should it be created?

It should be created in the way BANKING OMBUDSMAN in India has been created.

(b) What should be its structure?

It should have similar structure as that of BANKING OMBUDSMAN in India.

(c) How should it be funded?

Sole funding byGovt/DoT& without any financial burden on telecom service providers & without any linkage with the percentage of revenue of thetelecom service providers.

(d) What types of complaints should it handle?

Only telephone/landline, internet/broadband & mobile related complaints/grievances received from individual customers who has subscribed that service.

All other complaints/grievances, which includes group complaints, third party complaints, suggestions, policy related, etc. should be excluded from the purview of such institution.

(e) What should be its powers, functions, duties and responsibilities?

It should have similar powers, functions, duties and responsibilities as that of BANKING OMBUDSMAN in India.

07/09/16.

(R.K. Gupta)
DE(RA),CO