

**Uninor Response**  
to  
**Consultation paper on Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services’ (CP 4 of 2014)**

At the outset, we welcome TRAI’s initiative to issue this consultation paper to review the existing benchmarks of Quality of Service specified for various parameters w.r.t. wireline and wireless services basis TSPs representations of practical difficulties in achieving the prescribed benchmarks.

Since Uninor is currently providing only prepaid mobile services hence our response is limited to Q5, Q6, Q7 and Q8 related with Cellular Mobile Telephone Services.

**Uninor Response to the issues under consideration**

**Question 5:** In your view, does the benchmark for parameter “Resolution of billing/charging complaints” within 4 weeks for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.

**Response to Q5:** We agree with the TRAI’s proposal in view of unforeseen reasons resulting in delay in resolution of complaints beyond 4 weeks.

**Question 6:** In your view, does the benchmark for parameter “Period of applying credit/ waiver/ adjustment to customer’s account from the date of resolution of complaints” for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.

**Response to Q6:**

The time period for posting waiver should be reviewed as suggested by TRAI. However, it should be clearly specified in the amended regulation that 1 week period for this purpose should be counted after expiry of complaint resolution period which is proposed by TRAI as 98% within 4 weeks and 100% within 8 weeks. Accordingly, if complaint resolved within 4 weeks and 8 weeks – TSP should get 5 weeks and 9 weeks respectively for posting the waiver.

We request TRAI to clearly define the complaint resolution period in the amendment to remove all ambiguity / issues which is commonly observed during the metering & billing audit.

**Question 7:** In your view, does the benchmark for parameter “Percentage of calls answered by the operators (voice to voice) within 60 seconds” for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Can the ‘Percentage of calls answered by the operators (voice to voice)’ be made within 90 seconds instead of 60 seconds? Please give your comments with justification.

**Response to Q7:** We agree with TRAI proposal of revision in the benchmark for this parameter which is not met by most of the TSPs despite of various efforts and initiatives taken due to its very stringent benchmark.

We suggest to amend the benchmark for this parameter in line with the benchmark specified by TRAI for the Broadband services as “Percentage of calls answered by the operators (voice to voice) within 60 seconds” to  $\geq 60\%$  due to following reasons:

- Customer feedback basis various interactions is to get his/her query resolved for which he is complacent with waiting for some additional time period. Resolution quality is found to be the prime factor in managing customer experience in our segment of customers.
- In a business scenario of maximum calls being received at toll free customer complaint number of 198 and customers having the liberty of calling multiple times, delivering on high service levels of achieving 90% of calls answered within 60 seconds is a constant challenge. We believe that downward revision in the benchmark, while increasing the bandwidth for service provider will not impact customer much since there will only be a delay in the time taken to answer the call.
- Spurts in calls are sometimes encountered as a resultant of new promotion / product launch, unexpected event etc. This leads to sudden influx of calls at call center, impacting service delivery. While the customer is complacent with waiting for some additional seconds in order to be able to receive the update, the impact on service level is immediately seen. The above suggested revision in the benchmark will surely give the service provider higher bandwidth in handling calls in such circumstances as compared to meeting existing benchmark.
- Customer behavior as per trends show high calling patterns during certain time periods of the day - for instance, evening peaks are generally seen between 6 to 9 PM wherein maximum call volume is received. High resource planning is required for these time periods to be able to meet the existing benchmark, even though the resources may remain underutilized at other points of time resulting in higher cost to the service provider. The proposed revision of benchmark will help in better resource utilization for service provider

**Question 8:** Shall the benchmark for parameter “Termination/ closure of service” for Basic Telephone Service and Cellular Mobile Telephone Service be revised? If so, what shall be the revised benchmark? Please give your comments with justification.

**Response to Q8:** We agree with the proposal of revision in the benchmark from 100% within 7 days to 95% within 7 days.

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