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Dear

Sri A. Robert J. Ravi, Advisor (CA&QOS)

Telecom Regulatory Authority of India,

Mahanagar Doorsanchar Bhavan,

Jawahar Lal Nehru Marg,

New Delhi-110002

Sub: Suggestion on Consultation Paper-Press Release No. 227/2012

Dear Sir,

This has with reference to your Consultation Paper on "Review of implementation of the Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006 dated 21st March, 2006" released on 27th November, 2012-12. We give our suggestions on questions No. 6 & 7

TRAI should play a pivotal role in appointment of auditors do and fixing of professional fee for compliance with regard to Code of Practice for Metering and Billing Accuracy. In other words the TRAI should directly appoint the auditors from the panel of auditors formed by them. This concept is based on the methodology followed by other regulators like CAG, RBI, Excise Department, etc where they form the panel of auditors and appoint them for the respective companies.

In case the appointment of auditors and fixing of Professional fees are performed by TRAI, the same will fulfill the objective of compliance with regard to Code of Practice for Metering and Billing Accuracy in the following ways:

1. This will give more independence to the auditors as a result the quality of audit will improve
2. This audit will get due importance. Presently, this audit is not being given due

conducted.

3. This will give more authorities to auditors as a result in depth audit will be conducted. The auditors will be accountable to TRAI

4. The quality of data provided by Service Providers will improve as a result the reporting will be more true and fair
5. The cartel between auditors and companies will be broken since some auditors are influencing the Companies in appointment of auditors of their choice after completion of their tenure
6. **Fixing of Professional Fee by TRAI**
 - a. Presently, the quality of this audit has come to a stage where the auditors are ready to compromise with the services by charging very less professional fee. Therefore, the fee structure should be fixed by TRAI based on the followings:
 - No. of circles,
 - No. of Subscribers,
 - No. of plans and
 - Complaints referred by TRAI

Thanking you
Yours faithfully,

For Chandra Wadhwa & Co.



Chandra Wadhwa
Sr Partner