

To,  
**Smt. Vinod Kotwal,**  
**Advisor (F&EA),**  
Telecom Regulatory Authority of India,  
New Delhi

Dear Madam,

I would like to Thank You for giving Opportunity to Present Counter Views on the subject by bringing Consultation Paper

All the Operators seems to Believe that Call Drop is not their Problem and are blaming other Parameters for the same and seems that they are not responsible for call drops.

According to them There is No Loss to Customer when there is a Call Drop and There is No Extra Income to them due to this.

What would happen if a customer is trying to connect to a Call Center and there is a call Drop ? As this kind of calls are associated with Longer Hold Time, every time you Reconnect again you need to go through Various Menu option and Mostly Speak with a New Customer Care agent and explain Entire Ramayana to that Person right from Beginning. **In this case there is a Criminal Wastage of Time (for Redial and Repeat of Conversation) and Resources (Service Provider would Charge for Both Calls) of Customer.**

Still Service Providers Say that they does not get any Extra Money .....Obviously Telecom Operator would get Extra Revenue

Whose Responsibility is to Setup Infrastructure so that there are No Call Drops of within the Limit Set up by TRAI ? is it Service Provider or Customer ?

Recently in One Interview on CNBC-AWAAZ <https://www.youtube.com/watch?v=uaKCxPCZSGs>

Rajan S Mathews, Director General, Cellular Operators Association of India from had said that

***"We do not have Enough Cell Towers and We do not have enough Spectrum"***

***"You cannot take 5 Kilo and Put it in 2 Kilo Bag, it is going to Burst"***

**Whose Responsibility is to Build Towers ? Why did Service Provider did not take more Spectrum in Recent Auction**

**Who has asked to Service Providers to Put 5 Kilos in 2 Kilo Bag ? When Telecom Service Providers know that they have only 2 Kilo Capacity then they should either Increase the capacity of Bag from 2 Kilo to 5 Kilo and then Add or only put 2 Kilo in a 2 Kilo Bag (Meaning they should not acquire more Customer then their Capacity)**

Vodafone has in its comments said ***"We are Compliant with the QOS Parameters laid down by the Authority"***

**While the findings of the Authority are Totally Different in Mumbai and Delhi when Authority did an Independent in June and July by TRAI**

**For Mumbai**

**5Overall Operator Analysis**

KPI	Idea	Airtel	Vodafone	Reliance (GSM)	Aircel	Tata (GSM)
Call Attempt	570	529	535	575	550	546
Blocked Call Rate	10.00%	3.02%	3.93%	31.13%	4.36%	4.58%
Call Setup Success Rate (>=95%)	90.00%	96.98%	96.07%	68.88%	95.64%	95.425
Dropped Call Rate (<=2%)	5.56%	0.97%	4.83%	2.29%	3.19%	5.51%
Rx Quality (0-5) (>=95%)	86.46%	91.11%	89.56%	85.53%	85.60%	89.50%
Handover Success Rate (>=95%)	97.87%	96.74%	97.54%	98.01%	96.86%	95.40%

Vodafone's Reply Figure for June is 1.11 % and for July is 1.10 % While By TRAI's Report is 4.83 %. There is a Huge Difference in Figures by Vodafone and TRAI

**For Delhi**

KPI	Aircel	Idea	Vodafone	Airtel	Reliance	Tata (CDMA)
Call Attempt	441	782	490	587	603	723
Blocked Call Rate	3.27%	48.96%	4.71%	8.16%	9.44%	2.80%
Call Setup Success Rate (95%)	94.82%	97.16%	95.72%	91.96%	82.71%	99.16%
Dropped Call Rate (2%)	5.18%	2.84%	4.28%	8.04%	17.29%	0.84%
Rx Quality (0-5) (95%)	82.69%	91.12%	90.67%	84.32%	85.36%	99.68%
Handover Success Rate > 95%	97.85%	98.65%	94.15%	95.94%	96.86%	94.12%

Vodafone's Reply Figure for June is 1.06 % and for July is 1.32 % While By TRAI's Report is 4.28 %. There is a Huge Difference in Figures by Vodafone and TRAI

As can be seen in above example that there are More Reds then Greens and most of the Operators have failed in Blocked Call Rate, Call Setup Rate, Dropped Call Rate, RX Quality

Authority should ensure that the Service Providers should not acquire more than what their actual Capacity to Serve. Their New Acquirement should be halted till the time they increase their capacity

It is a high Time that customer should not be taken from Ride and Appropriate Compensation should be given by Telecom Operators for Call Drops.

Hope Authority Takes a View of the above and come with Detailed Order soon.

Thanking You,

**Bhavesh Harish Patel**

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