

Wg Cdr Anil Nag (Retd),
T-460, Ashiana Utsav,
Village Machhwa,
Kalwar Road,
Jaipur - 303706 (Rajasthan)
Mobile : +91 98680 71898
Mail : wgcdrnag@gmail.com

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Counter Comments : Consultation Paper No. 4/2015
Compensation to the Consumer in the Event of Dropped Calls

Dear Madam,

1. My counter comments on this consultation are as follows.

Service Organisation and TSPs : The Sum and substance of their submissions are :

2. COAI, AUSPI and all TSPs have commented that they have done all that they could, they are doing all that they can and will do everything that should to adhere to the laid down QoS parameters including dropped calls.

3. They have indicated various sums of money they have invested a few lakhs of crore of rupees in building up telecom infrastructure.

4. That dropped calls are due to external factors like spectrum , inability to install towers , and poor quality of hand sets. Apparently as per them it the central, state and local self governments and consumers who are responsible for it.

5. They are opposed to any compensation to consumer for dropped calls.

Counter Comments :

6. Dropped calls and poor QoS are a menace that happens far too frequently. There is no getting away from it, any amount of studies to the contrary notwithstanding. It is for TRAI and other expert bodies to decide on methodology to determine and measure it.

7. They may have spent a fortune on setting up infrastructure. But their exposure to credit from Indian banking system has remained static at around Rs 90,000/ crore for quite a while. It is not known where did they get all this money from. Hence, their claim in this aspect may not be sustainable.

8. Poor quality of service and problem of dropped calls is more pronounced in city outskirts and sparsely habitated areas where problem of installing towers does not exist. Hence, it is more of an excuse than a real problem. I live and interact with those living in these areas in Jaipur and know it firsthand.

9. The consumer must be compensated for the dropped calls for sure. The consumer is not obligated to pay for deficiency in service. **As an immediate measure all pulse rates other than per second pulse rate must be abolished. There should be only one pulse rate and that is per second**

pulse rate. This way consumer will be spared the double whammy of not only poor QoS but paying for it. It should be universally applicable, be it local area or roaming.

10. **Any suggestion that consumer can exercise his choice to change over to per second plan is not acceptable as it comes with cost and validity and other issues related to other pulse rates.** MTNL has suggested this approach.

11. I have commented in detail about this per second billing which may please also be referred.

Other Stakeholders:

12. I have nothing much to comment on the views of other stakeholders. However, I reiterate all that I submitted in my comments dated 21.09.2015. Please include those as my counter comments as well including these.

Conclusion:

13. The problem of dropped calls and poor QoS is acute. TRAI may please address both and find immediate and long term solution to these problems. Per Second rate and abolishment of all other rates can be implemented immediately. Other solutions can follow later.

14. Please consider these as my submission for OHD as well.

Thanks and Kind Regards,

Wg Cdr Anil Nag (Retd)
28th September 2015

Smt. Vinod Kotwal,
Advisor (F&EA)
TRAI
New Delhi