

Airtel response / inputs to the Draft 15th Amendment to the TCCPR 2010

1. This proposal does give a direction (way forward) to subscribers of call back numbers / entities whose resources have been disconnected, and to the Operators on what to do after Notice 2 / 3 has been issued.
2. The Amendment should explicitly mention that it applies only to subscribers of call back numbers and entities, and not to direct telemarketing numbers disconnected for UCC violations.
3. The Operators should be allowed to recover from such customers the expenses which may reasonably be incurred in such restoration.
4. Reasonable time to be allowed to operators for such restoration – 2-3 days for Mobile and 7-10 days for Landline / DSL / PRI lines.
5. The Regulation should provide for suspension/barring of violating and associated numbers for 21 days. Operators to be allowed to suspend the number(s) and not permanently disconnect the same for such period so as to allow restoration without having to recreate the number. This will save precious time and effort for both the customer and the operator. Recreating the number (if disconnected) involves time, effort, cost and has a dependency on availability of network elements (number series, availability of port on the pillar/DP in case of land line). This would require fresh documentation, creation in CRM, verification, installation, activation etc.
6. Therefore it is recommended that the Regulation should specify a time-limit (say 2 weeks) within which time such affected parties can approach TRAI for restoration.
7. Postpaid - customer to clear all outstanding dues of the suspended/disconnected number before such restoration.
8. Prepaid – balance forfeited on such suspension / disconnection not to be refunded / adjusted / should be left at operator's discretion.
9. TRAI to roll back through a refund / adjustment the penalty paid by the TSPs, for complaints basis which the customer number(s) was disconnected, in subsequent SCNs as TRAI has found merit in the case and has allowed restoration of the number(s).

10. Subscriber to follow all the activation requirements for such restoration, if suspension is not permitted OR the restoration request comes after the allowable window. Customer would be required to furnish complete documents in case of restoration of a disconnected number.
11. We recommend that it be made mandatory for such customer to register for telemarketing.
12. TRAI should remove history of such numbers from Modules 1-4 on the NCPR and create logs of restoration with details of prior disconnection in a new module.
