



Comments on Draft Standards of Quality of Service of Basic Telephone Service (Wireline) and Cellular Mobile Telephone Service (Fourth Amendment) Regulations, 2014

Reliance Communications Ltd (RCOM) on Draft Standards of Quality of Service of Basic Telephone Service (Wireline) and Cellular Mobile Telephone Service (Fourth Amendment) Regulations, 2014.

1. RCOM welcomes the opportunity to provide its comments on the Draft Amendment (4th Amendment) on the Standards of Quality of Service of Basic Telephone Service (Wireline) & Cellular Mobile Telephone Service Regulations 2014.
2. TRAI, through this draft amendment has proposed increase in the amount of financial disincentive towards contravention to prescribed benchmarks in the aforesaid Regulations.
3. At the outset we wish to inform the Authority that RCOM is committed to comply with the provisions of the Standard Quality of Service Regulations and its amendments for both cellular as well as basic services (wireline) and we are of the view that the TSPs should not be imposed financial disincentive with an assumption that such financial disincentive shall act as deterrent to the TSPs and any increase in the amount of financial disincentive shall lead to better Quality of Service.
4. It is worthwhile to mention that in the highly competitive market like India, wherein the customers have the freedom to switch to any network of their choice, it is imperative for the TSPs to regularly monitor their networks and customer services to provide good quality of service to the customers. Moreover, with comparable tariffs and equivalent services, the operators themselves are under pressure to maintain their QoS standards, in case they need to sustain in the market. Hence, it is submitted that the QoS are driven by market forces and no further financial disincentives should be levied upon TSPs.
5. Further we request the Authority to consider below submissions before making any final decision on this matter.
 - a. **Calls to general enquiry numbers of TSPs should be excluded from measurement of parameter '*Percentage of calls answered by the operators (voice to voice) within 90 seconds (Benchmark : 95%)*':**

Today, TSPs have setup different mechanism/modes of communications like Short Text Messages, emails, brochures, websites, commercials and advertisements, mass media etc., to address the queries of their customers and to spread all necessary information related to customer service. However, voice call is still the preferred mode for customers to enquire the features of products and services by contacting the call center executive. Thus, with the generation of new technology and services, not only the calls made by the subscribers to speak to the contact center executive for enquiry of the features of products and services has risen but also the average duration period of each call has witnessed manifold increase. Hence, the TSPs are providing sufficient information to its customers to meet their expectations, however, meeting the benchmark has become all the more strenuous despite

optimal utilization of the resources creating unwarranted queues while servicing the customers.

Therefore, it is requested that for the purpose of measurement, the calls made on number 198 which caters both for complaints as well as service requests should only be considered and calls made to general enquiry numbers of individual operators should be excluded.

b. Common Exclusions for external factors beyond control of TSPs:

It is requested that TRAI should not levy penalty on TSPs if they are not able to comply with benchmarks due to factors beyond their control like Natural Calamities, Law & Order related issues, border site coverage restriction etc.

6. We hope that the Authority shall consider the above submissions before taking final decision on this matter.
