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13<sup>th</sup> February 2015

**Telecom Regulatory Authority of India**  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg, Old Minto Road  
New Delhi-110002

**Kind Attention : Shri A. Robert J Ravi, Advisor (QoS & CA)**  
**Subject : Response to TRAI Draft Amendment (Fourth) to the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services Regulations, 2009**

Dear Sir,

This is with reference to the draft amendment issued by TRAI on 28<sup>th</sup> January 2015.

We are pleased to submit our comments and views on the consultation on Draft Amendment (Fourth) to the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services Regulations, 2009

We hope that our submissions will merit your kind consideration.

Thanking you

Yours faithfully,  
For **Vodafone India Limited**

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**Vodafone's response to the TRAI Draft (Fourth) Amendment to the Standards of Quality of Service of Basic Telephone Service (Wireline) and Cellular Mobile Telephone Service Regulations, 2009**

At the outset, it is our continuous endeavor to provide the best in class telecommunication services and thereby meet all the Quality of Service (QoS) parameters laid down vide the TRAI regulations. We are of the firm belief that the QoS of Networks & Customer Service are the key differentiator for customers in this competitive market and therefore adequate investments are being made on a continuous basis for improving the customer service and network performance and even investing in additional frequencies.

The explanatory memorandum of the draft amendment has raised concern about the penalty not being sufficient deterrent for repeated violations. However, it has also been acknowledged that the over-all compliance levels have increased. In fact the biggest deterrent against not meeting the benchmark is the fact that the performance is uploaded on the TRAI web-site which has an extremely undesirable consequence of negative media reporting which impacts the brand value.

Apart from our reporting of the Quality of Service performance on a monthly/quarterly basis, we are also subjected to quarterly audits for both our submissions and live data measurements. Additionally Drive tests are also being carried out by these auditors for mapping the network availability. We strongly believe that there is a robust level of trust between the regulator and the service providers for quality of service issues. Therefore, in case of certain force majeure conditions, we ensure that any such occurrences are reported pro-actively to the Authority well in time. A few examples of such instances are:

1. Jammu & Kashmir floods
2. Uttar Pradesh floods
3. Severe cross-border interference in 2100 MHz frequency
4. Spectrum re-farming in Delhi and its impact on QoS

Besides the force majeure conditions (listed above); there are several other difficult circumstances which lead to an impact on the Quality of Service performance and could lead to repeated non-compliance. A few such examples are:

- a) **Local Law & Order issues** - Certain Circles and areas within certain circles (eg. LWE areas) are constantly affected by Law & Order issues, thus making it a very difficult for our personnel to reach and service the BTS sites.
- b) **Extremely poor supply of electricity by the SEB's** – The power situation in certain states is in an extremely bad state. There are long periods of power outages or the quality of power supply (frequency and voltage variations) is extremely poor. The back-up capabilities – inverters and gen-sets have limited capacities and thereafter for longer power outages the BTS fails.
- c) **Site acquisition** issues in some specific areas like Delhi's Lutyen's zone, Cantonment areas, Hilly areas, areas under the control of railways, forest land, etc.

Notwithstanding the above, since the concern of the Authority is in regards to repeated non-compliance, we believe that the majority of the repeated non-compliance are due to identified external factors which the Authority does examine and does accept the explanation provided by the service providers.

However there are two parameters (listed below) for which we have found the benchmark quite challenging. The parameters are:

1. Worst affected cells having more than 3% TCH drops (call drop rate):
2. Percentage of calls answered by the operators (voice to voice) within 90 seconds ( $\geq 95\%$ )



We would like to avail this opportunity to request for a review of the two parameters. If the concerns are suitably addressed, then the debate on repeated violations would become unfruitful.

### **1. Methodology for reporting of Worst affected cells having more than 3% TCH drops (call drop rate):**

Finally, we would also like to highlight the technical difficulty being faced in achieving the benchmark levels for the parameter TCH drop <3%, which is a concern being faced by several other operators.

This parameter was being measured and calculated on the basis of a cumulative cell wise performance. We have strong technical reasons to believe that our method for the calculation was the appropriate methodology. However, vide TRAI's letter dated 1<sup>st</sup> April 2014, the methodology of calculation was altered and we were asked to calculate on a daily average basis.

The basic rationale for calculating this parameter on a 'monthly cumulative cell-wise actual' method is that congestion behaviour, on a daily basis, is dynamic and therefore nobody can ensure that the benchmark is being met on any single day. The key issue is that if a cell is consistently having a poor performance during the month, then those cells need to be focused upon by the operator to ensure improvement to achieve overall meeting of the benchmark.

In this regards, we have made several representations through our industry association COAI (dated 12<sup>th</sup> June, 2014 & 17<sup>th</sup> October, 2014), expressing our concerns related to this measurement methodology and have sought a review. In a meeting called by TRAI on 12th August, 2014 to discuss several issues related to Quality of Service and we had also raised the above concern during the meeting.

**We respectfully urge the Authority to consider our concerns and modify the calculation methodology accordingly.**

### **2. Percentage of calls answered by the operators (voice to voice) within 90 seconds ( $\geq 95\%$ )**

The consultation paper has raised a concern over customer service parameters. Basis our experience of the last few years, there is one parameter which the entire industry has faced challenges in meeting consistently – Call Centre.

The Authority had conducted a consultation for the review of the Quality of Service parameters in June, 2014 and this was one of the parameters reviewed. The amended regulation was issued in August, 2014. We are pleased to note that the Authority acknowledged the complexity and the challenge faced by the industry in meeting the original benchmarks. However, while the time to answer the call was increased from 60 seconds to 90 seconds, the compliance percentage was made more stringent – from 90% to 95%.

With these revised benchmarks we have observed deviations in 2 circles in QE Sept'14 & deviations in 1 circle in QE Dec'14. We believe that the tightening of the % from 90 to 95% has again made the parameter difficult to comply. However, only a few months have passed since the amendment. Based on the performance of a few more quarters, a clearer picture will emerge in regards to this parameter.

Apart from this parameter, there are no other CS parameters where we are experiencing repeated failures. **Therefore, we request that the regulation may be retained in the current form without any amendments. This regulation already has a penalty escalation clause and on repeated violation the penalty gets raised to Rs. 1 lac.**