

VTL/Reg/TRAI/1509/4762
September 21, 2015

Smt. Vinod Kotwal
Advisor (F&EA),
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
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New Delhi — 110 002

Subject: VTL Response on Consultation Paper on “Compensation to the Consumers in the event of Dropped Calls”


Ref: TRAI Consultation Paper No. 4/2015 dated 4th September, 2015

Respected Madam:

Videocon Telecommunications Limited welcomes the opportunity to give our comments to TRAI's consultation Paper on “Compensation to the Consumers in the event of Dropped Calls” Please find attached herewith our response on the same.

This is for your information and kind consideration please.

Kind Regards



Meena Bisht
Sr. Manager
Regulatory Affairs
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Encl.: as above

VTL Response to Consultation Paper

on

'Compensation to the Consumers in the Event of Dropped Calls'

1. Do you agree that calling consumers should not be charged for a call that got dropped within five seconds? In addition, if the call gets dropped any time after five seconds, the last pulse of the call (minute/second) which got dropped, should not be charged. Please support your viewpoint with reasons along with the methodologies for implementation.

Response: Call drop is a phenomena for which various entities are responsible like TSP on both ends of the call (For Network Quality), Public & Private organizations (For opposing tower installation, sealing) and Govt agencies (for Spectrum scarcity and 24x7 Power un-availability), location where tower is installed, availability of network of other operator in case of roaming etc. If we consider TSP's Network as quality factor alone, Call Drop rate will be with-in the permissible limits. Govt needs to provide support in resolution of issues related to spectrum availability and uniform guide lines for acquiring tower space. We recommend that it should be considered as a public service so that RWAs and other public organizations do not oppose it unreasonably.

It is also strongly recommended that awareness programs for public organizations, RWAs are taken up by the Government to remove myths about health issues from tower EMF radiations. It will help in reduction of opposition by RWAs and other public organizations. Hence, we respectfully submit that not charging the customers for dropped calls is not the appropriate solution for resolving the issue of call .

Q2: Do you agree that calling consumer should also be compensated for call drops by the access service providers? If yes, which of the following methods would be appropriate for compensating the consumers upon call drop:

- (i) Credit of talk-time in minutes/ seconds
- (ii) Credit of talk-time in monetary terms
- (iii) Any other method you may like to suggest Please support your viewpoint with reasons along with the methodologies for implementation.



Videocon Telecommunications Limited

Response: We have already mentioned in response to question 1 above, that if we consider the TSPs network quality factor alone then we are very much in the permissible limits of call drops and hence Q2 above does not arise.

Q3: If the answer to the Q2 is in the affirmative, suggest conditions/limits, if any, which should be imposed upon the provision of crediting talk-time upon call drop and usage thereof.

Response: NA

Q4: Is there any other relevant issue which should be considered in the present consultation on the issue of call drops?

Response: We would like to submit that instead of not charging the customer or giving compensation on account of call drops, following actions are urgently required to improve the Quality of Services and reduce the incidences of call drops:

- Uniform Tower policy and RoW guidelines.
- Increase quantum of spectrum and expedite spectrum harmonization.
- Removal of Interference – intra country and cross border.
- Major campaign initiatives by the Government on educating citizens on no health impact due to EMF radiation.