

Date : 15/11/2016

To,
Mr. Kasim (Advisor - B&CS)
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg,
(Old Minto Road), New Delhi - 110002.

Dear Sir,

Subject: Response to the consultation on Draft Standards of Quality of Service and Consumer Protection (Digital Addressable System) Regulations, 2016

Please find our response on the above subject. We would be happy to discuss some of key aspects, if desired.

Yours Faithfully,

For INDUSIND MEDIA & COMMUNICATIONS LTD.

Subhashish Mazumdar
Authorized Signatory



IMCL's Response on Draft QoS (Quality of Service)Regulations

We are thankful to TRAI for the new draft Regulations "The Standards of Quality of Services and Consumer Protection" in Digital Addressable systems.

We are submitting our responses as below for finalising the regulation:

Chapter II – Subscription to TV broadcasting services

(2) Every distributor of TV channels shall adopt consumer friendly methods employing multiple means such as a telephonic call to Customer Care Centre, short messaging services (SMS), e-mail, mobile apps etc. to request for subscription of TV broadcasting services.

Response : Call centre currently available and its number can be published in website for addressing new enquiries. Also email or web form on new enquiry can be made available.

(4) Every distributor of TV channels shall offer all a-la-carte channel(s) and bouquet(s) on monthly subscription basis to consumers.

Response : Facility available. All channels to be configured on a-la-carte basis in the system. This is fine

4. Procedure for connection

(2) The distributor of TV channels or local cable operator, as the case may be, shall provide TV broadcasting services to the consumer only after obtaining completed Consumer Application Form and provide a copy of the said form to the consumer.

Response : The KYC can be set mandatory in the system. It can be made LCO's responsibility to adhere to the compliance of the CAF form.

Chapter III – Maintenance of Service after initial Subscription

9. Temporary suspension of TV broadcasting services

(1) Every distributor of TV channels or local cable operator, as the case may be, shall, upon request from the subscriber, temporarily suspend the TV broadcasting services :

Response- (OK with TRAI) : Provided that such request shall be made by the subscriber at least fifteen days prior to the date of such suspension.

Provided further that such temporary suspension shall be for a minimum period of one month and multiple thereof, but limited to maximum of three months in a calendar year.

Charge an amount not exceeding Rs. 25 as restoration fee from subscriber for resumption of services has to be configured. Suggested that the package disconnection should be effective the expiry of package.

Chapter IV - Customer Care and Complaint Redressal

14> Customer Care Centre –

1. Having Toll Free Number –

Response:

a. Yes -Toll Free Numbers

b. Call Centre Timings – 8.00 am (8 Hours) to 11.00 pm (23 Hours)

c. Language option – from 2 to 8 , depending on region location

Additional cost of multilingual call centre executives over standard 2 languages is Rs. 3,000 per month per executive

d. IVRS –

(a) the first level of the Interactive Voice Response System (IVRS) provides for language selection;

(b) the second level of the Interactive Voice Response System (IVRS) provides for options relating to the broad categories of complaints and service requests

(c) the third level of the Interactive Voice Response System (IVRS) provides for a sub-menu under service and complaint requests, separately; Provided that the sub-menu in the third level shall also contain an option enabling the customer to speak to a customer care agent.

Response : The following are estimated :

Cost of development of IVR 3 levels with payment gateway will be Rs. 500,000

Cost of payment gateway integration for customer self care will be Rs. 250,000

Cost of VOX for recording of call will be Rs. 25,000

e. Web based complaint management system –

Response: Web based Complaint Management can be in phases within one year of Digitalisation

2. Engaging Customer Care Centre – **can be Outsourced and engaged with professionals**

3. IVRS – **First Level IVRS should be essential , Second level and Third level with Sub Menus can be in phases**

4. Response Time for Customer Service Centre for answering the Calls within the specified duration is followed.

5. Awareness of Toll Free Number – Displayed on the Home Page of Website, Barker Channel, Scroll of In-House Channels, OSD, Bills and Receipts issued. **(IN Digital has LCN 100 with TVC slot, therefore we require Second Channel for Customer Information) may be with LCN 101**

Response:

It has been principally agreed that there would be a channel which will be dedicated for customer information and whose LCN no will be common across all providers.

Also the IVRS can be made phase wise over a period of 2 years

15> Complaint handling by Customer Care Centre

1. Every call is entered in the CRM with unique Docket / Ticket Number
2. On every call Docket / Ticket Number and (TAT) the time within which the complaint is likely to be resolved is informed to the Customer
3. After resolution of Complaint informing the Customer is not done. LCO Subscriber's Complaint is attended and resolved by the LCO, however it is not informed to us after resolution (dark area)

Response: The responsibility goes to the LCO to close the complaints as required by the QOS. These points to be captured in the agreement signed between MSO and LCO stating the responsibility borne by respective parties to achieve the QOS

16> Time Limit for Redressal of Complaints

1. Redressal of Complaints
 - a. All Direct Point Complaints are responded within eight hours.

- b. 90% of 'NO Signal' complaints are restored within 24 Hours of receipt of such complaints in Direct Points.
- c. Billing related complaints received from Direct Point Customers are redressed within 7 days of receipt of such complaints and Refunds if any are made within 30 days of the complaint.
- d. 90% of all complaints of Direct Point Customers are redressed within 48 Hours
- e. No complaint except billing in Direct Point remains unresolved beyond 72 Hours

Response : Regarding LCO Subscriber's Complaint, there is no revert from the LCO and also there are no Repeat calls therefore we can assume that these Complaints are also attended and resolved.

17> Redressal of Complaints by Nodal Officers

1. Appointment of Nodal Officer –**Yes – OK IN Digital has state wise Nodal Officers. List is available on the website.**
2. IN Digital Nodal officer list carries, Name of the Officer, Address, Mobile Number and Email ID
3. Change in the IN Digital Nodal Officer list is update and also informed to TRAI
4. In Case Customer is not satisfied, can always contact the Nodal Officer (YES)
5. Every Nodal Officer shall, -----
 - a. ***Register every complaint lodged by the subscriber – OK, require process to register the complaint in MQ-CRM for IN Digital and in ICC for NXT Digital***
 - b. ***Issue an Acknowledgement on receipt of the mail – We acknowledge the mails on receipt as well as after redressal.***
 - c. ***Redress such complaints within 10 days – YES, we follow***

18> Complaints forwarded by TRAI

- a. ***All such Complaints will be attended, responded and resolved expeditiously and informed to the Authority after resolution.***

19> Maintenance of records of Complaints

1. All Complaints are registered in MQ-CRM & ICC and can be retrieved as and when required.

Response: Billing provision to be given to LCO to punch the subscriber payment in the system and have triggering mechanism of email, sms as a payment receipt methodology.

Chapter V – Billing and Payment

24. (4) Every distributor of TV channels shall, either directly or through its linked local cable operator, as the case may be, issue a receipt to every post-paid subscriber for every payment made by a subscriber and shall enter the details of the receipt including the date and serial number of the receipt, amount paid by the subscriber management system of the distributor of TV channels against the name of the subscriber, within seven days of the payment made by the subscriber.

Response: To establish the payment receipt mechanism for the operator and make the LCO responsible for making the receipt entry and capture in the agreement with the LCO his responsibilities towards achieving the QOS

Chapter VI - Customer Premise Equipment

26. Supply and installation of the Customer Premise Equipment

(1) Every distributor of TV channels or local cable operator, as the case may be, shall provide to subscriber the conforming to relevant Indian Standards set by the Bureau of Indian Standards

Ok -BIS certificate of all STBs

(6) Every distributor of TV channels or local cable operator, as the case may be, shall be responsible for maintenance of Customer Premises Equipment offered under sub regulation (4) and sub regulation (5) for a minimum period of five years and the subscriber shall not be required to pay any charge towards repair and maintenance of the Customer Premise Equipment during such period.

Response: Connect with point no. 5. The above mentions of no charge for repair and maintenance of STB for a period covering 5 years, in the STB rental scheme where the ownership of the STB lies with the DPO. For outright purchase by subscriber provision of one year warranty and reasonable annual maintenance scheme thereafter.

(7) Every distributor of TV channels providing direct to home services may charge an amount not exceeding rupees two hundred and fifty as visiting charge per registered complaint of a person to subscriber's premises for repair and maintenance

We are not commenting on the point

Response: HITS or for that matter Local Cable Operator should also be eligible for the recommended charge as a visiting charge per registered compliant requiring visit of a person to subscriber's premises for repair and maintenance, specially applicable to HITS operator as they also provide pan India services including in the far flung areas of the country. Maintenance support is not available locally for HITS operator similar to DTH.

While the DTH services include outdoor equipment, the cable operator has his line and junction boxes which take an outdoor path into the room which may also be required for troubleshooting an issue.

Chapter VII – Publicity of Information and Consumer Awareness

26. Supply and installation of the Customer Premise Equipment

(1) Every distributor of TV channels shall establish a website.

Available

(2) Every distributor of TV channels shall provide a hyperlink for consumer corner on the home page of the website which shall be clearly visible and noticeable to visitors without scrolling the page

(3) The consumer corner hyperlink referred to in sub-regulation (2), shall point to another web page where the information in accordance with Schedule II of these regulations shall be available

(4) The web page referred in sub regulation (3), shall also have provision for login to the subscribers to access information specific to such subscriber in accordance with Schedule II to these regulations.

28. Consumer care Channel

(1) Every distributor of TV channels, who is offering any kind of platform services, shall designate a channel for the purpose of consumer awareness and the same shall be referred as consumer care channel.

Discussed earlier

30. Publicly of Information by broadcasters

(1) Every broadcaster shall publicise the MRP of its pay channel (s) and bouquet (s) through multiple means of communication such as website, scrolls in the concerned channels, periodically for wide publicity amongst the consumers and submit details of such measures to the authority.

Not of concern to us

Chapter VIII – Miscellaneous

32. Manual of Practice

(1) Every distributor of TV channels or local cable operator, as the case may be, shall publish a manual of practice, which shall contain information in accordance with Schedule IV to these regulations

Response: OK with this

33. Display of channels in EPG

(1) Every distributor of TV channels shall list all channels available on its platform in the electronic programme guide in the respective genres along with applicable a-la-carte prices.

Provided that in case of pay channels distributor of TV channels shall indicate MRP declared by the broadcaster in the electronic programme guide and for the free to air channels such prices shall be indicated as zero.

Response : Since the platform has a single EPG across the country display of differentiated pricing in relation to the price offered in each of the regions would not be possible.

35. Appointment of compliance office and his obligations

(1) Every distributor of TV channels shall, within thirty days from the date of commencement of these regulations, appoint a compliance officer.

Response : Ok with us
