



12th June, 2014

The Advisor (CA&QoS)
The Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg (Old Minto Road),
New Delhi - 110002

Idea Cellular's response to TRAI Consultation Paper on "Review of the Standards of Quality of Service of Basis Telephone Service (Wireline) and Cellular Mobile Telephone Services"

Sir,

This is in reference to TRAI's Consultation Paper No.04/2014 dated 21st May, 2014 on Review of the Standards of Quality of Service of Basis Telephone Service (Wireline) and Cellular Mobile Telephone Services wherein comments of the stakeholders have been invited.

The Authority would acknowledge that billions of varied transactions are processed in a day and on account of manual dependencies/automation failures/technical malfunctions/ downtimes etc, it is practically impossible to avoid the errors/deviations altogether. While it has always been our endeavor to meet all parameters and provide high class service to our customers, there are chances of deviation beyond the set benchmarks as no system is infallible and 100% foolproof. This has been acknowledged by the Government of India also on various occasions. The Authority will appreciate that the unique and complex environment in which Indian Operators offer services to its customers and the genuine possibility of random "errors of omission" or delays emanating from "external dependencies" are unavoidable. Therefore, there is a need for relaxation in the tight benchmarks set by the Authority and the financial disincentives thereto.

Our responses to the various questions in the Consultation are as follows:

A. Benchmarks Related to Basic services

Question 1, 2, 3 and 4 are not applicable

B. Benchmark related to both Basic and Cellular services

Q5. In your view, does the benchmark for parameter "Resolution of billing/charging complaints" for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.



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Idea Comments:

There are few instances because of various uncontrollable and unforeseen reasons as enumerated above where there could be delay in resolution of 100% complaints within 4 weeks. Hence, a relaxation of 5% in the benchmark for parameter "Resolution of billing/charging complaints" should be given before imposing financial disincentives.

Q6: In your view, does the benchmark for parameter "Period of applying credit/ waiver/ adjustment to customer's account from the date of resolution of complaints" for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.

Idea Comments:

We have internal processes across various functions within the organization which takes time to credit/waive/refund the payments. There could be some cases where the credit/ waiver adjustment cannot be applied within one week. In addition to this, the contractual obligation with international operators suggests that the timeframe to provide the TAP files is of 30 days, thereby making it difficult to meet the existing benchmark. Therefore it is very difficult to apply 100% credit/ waiver adjustment to customers account within one week of resolution of complaint.

The Authority must look into the facts and relax the parameter to 95% within one week of resolution.

Q7: In your view, does the benchmark for parameter "Percentage of calls answered by the operators (voice to voice) within 60 seconds" for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Can the 'Percentage of calls answered by the operators (voice to voice)' be made within 90 seconds instead of 60 seconds? Please give your comments with justification.

Idea Comments:

We have state-of-art customer care facilities so as to provide enhanced customer care experience to our subscribers. However over the years the number of subscribers has increased manifold, thereby increasing the load on call centers. Besides there are issues of system constraints/failure at times.

Therefore we request that the benchmark for parameter "Percentage of calls answered by the operators (voice to voice) within 60 seconds" be relaxed to 60-70%.

Q8: Shall the benchmark for parameter "Termination/ closure of service" for Basic Telephone Service and Cellular Mobile Telephone Service be revised? If so, what shall be the revised benchmark? Please give your comments with justification.

Idea Comments:

It is a general practice to retain the subscribers after the request for termination of service. To retain subscribers within 7 days may not be possible in spite of various efforts in all cases. We therefore request that this parameter be relaxed to 95% within 7 days of request for closure of service. This will benefit both the customer as well as service providers **OR** the benchmark should be 100% within 15 days.

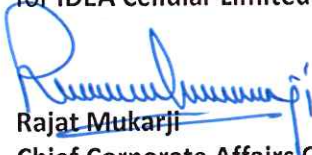
Apart from above mentioned parameters in the Consultation Paper, we would also request the Authority to consider revising the benchmark of parameter "Metering & Billing Credibility – Postpaid & Prepaid—billing/charging disputes" from 0.1% to 0.2%, due to the following reasons:

- Highly complex plan provisioning's / products giving specific benefit to customers.
- Large corporates (having multiple connections) making number of complaints on the same issue thereby increasing the number of complaints though there is only one bill generated.
- Tagging errors by agents while registering the complaint (Understanding issues between customers and agents).

We hope that the Authority will give due consideration to our abovementioned comments before revising the benchmarks.

Thanking You

Yours faithfully,
for IDEA Cellular Limited



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