



SSTL/Reg/TRAI/ 1406/227

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Advisor, CA & QoS
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi – 110 002

Subject: Response to TRAI Consultation Paper on 'Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services' dated 21st May 2014

Dear Sir,

At the outset we appreciate and welcome the Authority's consultation paper on 'Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services' dated 21st May 2014 at this juncture.

With reference to above please find enclosed our comments and point wise response to the consultation paper on 'Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services' dated 21st May 2014.

We hope that the Authority will consider our views and comments enclosed while, reviewing the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services.

Thanking you,

With Regards,

For Sistema Shyam TeleServices Limited

Suresh Yadav
Dy. Director, Corporate Regulatory

Enclosed: As above

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Response to TRAI Consultation Paper on 'Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services' dated 21st May 2014

1. Sistema Shyam Teleservices Ltd (SSTL) welcomes TRAI's initiative to review and revise the existing QoS Benchmarks by considering the practical and genuine difficulties faced by the TSPs.

2. TRAI has generally followed free market economics and allowed markets to address tariff concerns. We expect similar forbearance regulations with regard to quality of service starting with the cellular mobile telephone service which is highly competitive. Mobile market is truly competitive as there are on an average 6-7 operator in each service area and mobile service subscribers have option to change service providers through MNP without changing their mobile number. In the competitive market the quality of service is a differentiator and consumer decision to choose a particular network based on tariff and quality ensures effective market competition.

3. The uniform quality enforced through Regulation is not consistent with free market dynamics as it does not allow innovation and differentiation based on QoS in the market. The minimum quality of service also hinders segregation of market based on quality of service. Market segmentation based on quality is natural in free market economic for example in civil aviation there are low cost service and full service. This kind of segregation is not allowed as Regulations specify minimum benchmarks to be met. The QoS benchmark specified through regulation impose unnecessary cost on networks especially if subscribers do not get such QoS. Thus external Regulation are detrimental to the growth of competitive services like cellular mobile telephony.

SSTL's comments on the specific issues raised by TRAI in the Consultation paper On Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services are as follows:-

1. In your view, does the benchmark for the parameter "Fault incidences (No. of faults/100 subscribers/ month)" for Basic Telephone Service need revision? If so, what should be the benchmark? Please give your comments with justification.

SSTL Response

There is need to review the benchmark for QoS parameter "Fault incidence (No. of faults/100 subscribers/month) for Basic Service as multiple



conditions impact wireline network. Few reasons for faults unique to the wireline service are given below:

- i. **Customer Premises wiring and equipment related faults.** There are complaints purely related to CPE or internal wiring at customer's premises. These kind of complaints are not entirely within service provider's control and depends on the quality of wiring or CPE at customer end.

As maintenance of wiring rests with the building owner, it is also not possible in many cases to timely resolve the complaint. Till the time building wire gets repaired customer doesn't want to close the complaints. This is also major concern due to which operators are unable to provide timely resolution to end customers.

- ii. **Theft of overhead wire:** There are cases where operators are forced to lay down the overhead cables due to unavailability of required permission for underground RoW from the competent authorities. As a result there are frequent cuts or theft of these drops.
- iii. Some issues like Electricity / Power supply not available due to State Electricity Power failures, Heavy rainfall /floods etc are not within realm of service provider and result in excessive complaints.

In view of the above and considering the fact that maintenance of last mile connectivity is difficult in wireline networks, the benchmark for parameter "Fault incidence (No. of faults/100 subscribers/month)" for Basic Service may be enhanced from 5% to 10%.

2. In your view, does the benchmark for parameter "Fault Repair by next working day" for Basic Telephone Service need revision? If so, what should be the benchmark for faults repaired by next working day and by 3, 5 or 7 days? Please give your comments with justification.

SSTL Response

As mentioned in our response to Question 1 above that there are number of factors relating to maintenance of last mile connectivity due to which the fault incidents are high in wireline networks. Many reasons are not even in the realm of service providers and due to these reasons it is not possible to close the complaint within 24 hours. The reasons for delay in rectification in certain cases are reiterated below:

- i. **Delay due to underground and duct cables are stolen:** There are number of utilities which frequently carry out digging for

rollout/maintenance of their infrastructure. As a result there are frequent instances of fiber/wire cuts. The repairing requires permissions from local civic authorities which causes delay in restoration. During monsoon season, permission for digging the roads has been barred by the civic authorities.

- ii. **Customer Premises issues:** There are complaints because of internal/in-building wire, CPE not working etc. These are the key concerns due to which operators are unable to resolve customer complaint in time bound manner since operators are dependent on building owners for repairing of internal wiring and equipment vendor for repairing of CPEs.
- iii. **Unavailability of customer:** There are many instances when customer premises found locked or concerned person is not available even after seeking appointment. Occurrence of this issue delays the resolution to be provided and unnecessarily causing in delay in resolution.

In view of the above it is suggested that the revised benchmark for "Fault Repair by next working day" for Basic Telephone Service should be as follows:

- **For urban areas:** By next working day: $\geq 70\%$; within 3 days: 80%; within 5 days: 90%; and within 7 days: 100%;
 - **For rural and hilly areas:** By next working day: $\geq 60\%$; within 3 days: 70%; within 5 days: 80%; within 7 days: 90%; and within 10 days: 100%.
3. What are your views on relaxing the benchmark for parameter "Mean Time to Repair (MTTR) to ≤ 12 Hrs" for Basic Telephone Service? Please give your comments with justification.

SSTL Response

In view of the reply given in 1 & 2 above, we are of the view that this parameter should also be reviewed and the benchmark should be enhanced to ≤ 15 Hrs.

4. What are your views on removing the parameters for Basic Telephone Service (a) Call Completion Rate within a local network or, (b) Answer to Seizure Ratio (ASR) from reporting of compliance to TRAI? Please give your comments with justification.

SSTL Response

We agree with the TRAI that the QoS parameter Call Completion Rate (CCR) or Answer to Seizure Ratio (ASR) should not be mandated as service providers have sufficient exchange capacity and there are no technical constraints in meeting this parameter. SSTL has consistently met this parameter.

5. 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.

SSTL Response

Although operators are sensitive regarding resolution of complaints but in certain cases like International roaming subscribers where reconciliation of International Roaming TAP files/CDR takes time and therefore resolution of complaint may take more than 4 weeks time. Thus it is not always possible to meet the 100% benchmark. In addition there could be certain unforeseen instances which may delay resolution of complaint beyond the benchmark.

Therefore, it is suggested that the Authority should review the benchmark for the said parameter and revise that to 98% in 4 weeks and 100% with 8 weeks.

6. 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.

SSTL Response

The benchmark of 100% for "credit/ waiver/ adjustment to customer's account" within 7 days from the date of resolution of complaints is too stringent as there can be certain cases of delay due to unforeseen instances. Therefore, **we suggest to notify the revised benchmark of 95% for credit/waiver within one week and 100% within 2 weeks.**

7. 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.

SSTL Response

The benchmark specified for QoS parameter "Percentage of calls answered by the operators (voice to voice) within 60 seconds" is very stringent especially in market like India which is a growing market and new subscribers are joining network. In India subscribers prefer to call the call centres instead of using alternative options like SMS, Self care – website etc. for complaint registration or information. Whenever there is launch of new service, new tariff or new media campaign, we observe sudden surge in calls to the call centre. These spikes in number of calls are erratic and it is difficult for service providers at all times to handle all calls within QoS benchmark. Service Providers have invested heavily and created large capacities in call centres with thousands of seats but still it is not always possible when there is deluge in calls for queries on new tariff or services.

We would like to reiterate that cellular mobile market is highly competitive and thus suggest to follow free market economic and follow forbearance policy relating to QoS for mobile services.

Notwithstanding our views on forbearance of QoS for cellular services, we suggest that QoS parameter for "Percentage of calls answered by the operators (voice to voice) within 60 seconds" should be revised to 70%.

8. 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.

SSTL Response

The existing benchmark for the said parameter should be reviewed, as there are few exceptions when customer is not contactable or in case of corporate customers etc. The said benchmark should be relaxed to 95% within 7 days.