Reliance Communications Ltd. (RCOM) response to TRAI's Consultation Paper on 'Review of Telephone Services (Wireline) and Cellular Mobile Telephone Services'

Preface:

India is a fledging market from the data services utility per se. Voice and SMS services are now replicated by the multiple of online customer friendly applications providing voice, data and content sharing as per the user requirement. With the advent of 3G and 4G services, the market trend is moving towards faster speed and consumer dependence on web based services. In fact, Government is also supporting/motivating masses towards e- governance and more usage of data services.

This has become possible due to the world class network laid down by TSPs, who are competing in the fiercely competitive Indian telecom market. Operators are also putting in best of their efforts to ensure the QOS standards, which are the real judge to retain a customer in the network.

In fact , in the hyper competitive market like India, wherein the customers have the freedom to switch to any network of their choice, it is imperative for the TSPs to regularly monitor their networks to provide good quality of service to the customers. Moreover, with comparable tariffs and equivalent services, the operators themselves are under pressure to maintain their QoS standards, in case they need to sustain in the market. Hence, QoS are driven by market forces and a light touch approach should be adopted for QoS benchmarks.

Further, we welcome TRAI's initiative to revise the existing QoS Benchmarks by considering the practical and genuine difficulties faced by the TSPs and request that considering the best efforts of TSPs and market mechanism/competition to take care of QoS benchmark, **the financial disincentives should be removed on QoS parameters**.

Executive Summary:

We would like to reiterate our request of not levying any penalty on QOS benchmark and suggest for the new/revised benchmark in the table below:

Sr. No	Parameter	New benchmark/request
1	Fault incidences (No. of faults / 100 Subs / month) (**Wireline**)	**≤10%**
2	Fault repair by next working day (**Wireline**)	**In rural areas :** (a)70% by next working day (b) 80% within 3 working days (c) 90% within 5 working days (d) 100% within 7 working days **In urban areas :** (a) 70% by next working day

		(b) 85% within 3 working days (c) 95% within 5 working days (d) 100% within 7 working days
3	Mean Time to Repair (MTTR) **(Wireline)**	$\leq$12 hrs
4	CCR and ASR (**Wireline**)	ASR to continue
5	Resolution of billing/charging complaints" for Basic Telephone Service and Cellular Mobile Telephone	No change in existing benchmark
6	Period of applying credit/ waiver/ adjustment to customer's for Basic Telephone Service and Cellular Mobile Telephone	No change in existing benchmark
7	Percentage of calls answered by the operators (voice to voice) within 60 seconds" for Basic Telephone Service and Cellular Mobile Telephone	90 seconds
8	Termination/ closure of service" for Basic Telephone Service and Cellular Mobile Telephone	95% in 7 days and 100% within 14 days.

Our response to the queries sought by TRAI is as below:

Question 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.
&
Question 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.
&
Question 3:

What are your views on relaxing the benchmark for parameter "Mean Time to Repair (MTTR) to $\leq$ 12 Hrs" for Basic Telephone Service? Please give your comments with justification.

RCOM Comments:

The basic services (wireline) are mostly provided through underground cables and overhead cables. TSPs have to face multiple of issues while maintaining network/services to their customers. Some of these issues are as under:

- Damage of connecting cables due to repair and development work (like construction of Flyovers, expansion of Highways and infrastructure, Metro railway services etc) being undertaken by various Govt. authorities & civic bodies.
- Services also get affected due to major power failures / disruption in electric supply leading high dependence on battery backups and alternate means to ensure uninterrupted power supply, which has its own limitations of approx 4 to 6 hours of power backup.
- Restoration of connections in case of issues related to cable thefts by miscreant etc takes considerable time for TSPs.
- Many a times, the faults repair gets delayed in cases wherein there is an issue with the connections / equipment at customer premises, however, the same cannot be rectified due to non availability of customer during the visit to his premises.

Worthwhile to mention that the restoration of such faults involves major digging works/ authorities permission etc which has a challenge in itself considering the lengthy clearance process to be obtained from local civic authorities and private bodies / individuals.

In view of the above, it can be inferred that, even if TSPs are putting best of their efforts in restoring the faults at the earliest, they face challenges in the restoration works which is beyond their control. **We therefore suggest below revision to existing parameters mentioned in Q1, Q2 & Q3 above.**

Sr. No	Parameter	Our request for New benchmark
1	Fault incidences (No. of faults / 100 Subs / month)	**<10%**
2	Fault repair by next working day	**In rural areas :** (a) 70% by next working day (b) 80% within 3 working days (c) 90% within 5 working days (d) 100% within 7 working days **In urban areas :** (a) 70% by next working day (b) 85% within 3 working days (c) 95% within 5 working days (d) 100% within 7 working days
3	Mean Time to Repair (MTTR)	**<12 hrs**

Question 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.

Our Comments:

Since, the values of ASR provides an indication of Quality of Service provided by the switching system, hence, it is felt that ASR should be part of compliance reporting for checking the QoS of TSPs. However, in case of any non compliance, no financial disincentive should be levied on the TSP.

Question 5:

In your view, does the benchmark for parameter "Resolution of billing/charging complaints" within 4 weeks for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.

Our comments:

We believe that the existing benchmark of 4 weeks is the sufficient time for resolution of complaints pertaining to billing and charging disputes. However, it should exclude the billing / charging disputes related to International roaming subscribers as it takes time to exchange the International roaming CDRs.

Question 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.

Our Comments:

The existing benchmark of 1 week period for applying credit / waiver / adjustment to customer's account from the date of resolution of complaints seems to be sufficient, and hence, RCOM does not suggest any changes in the existing benchmark.

Question 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.

Our Comments:

Today, TSPs have setup different mechanism/modes of communications like Short Text Messages, emails, brochures, websites, commercials and advertisements, mass media etc., to address the queries of their customers and to spread all necessary information related to customer service. However, voice call is still the preferred mode for customers to get their queries resolved by contacting the call center executive.

With the advent of data services and related multiple of applications used by the masses using different handsets/smart phones, has led to more generic enquiry related calls to the call centers. Thus, with the generation of new technology and services, not only the calls made by the subscribers to speak to the contact center executive has risen but also the average duration period of each call has witnessed manifold increase. There are also incidences where even after adequate marketing campaign/customer education, the launch of new service/product attract multiple calls to the call centers, which takes certain time to ramp up the support services.

In view of the above, **we request TRAI's that the said parameter should be revised to 90 seconds instead the existing 60 seconds.**

Question 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.

We support the view of revising the said parameter considering the challenges faced by TSPs in meeting the existing benchmark for various reasons Viz. Delayed recovery of Customer Premise Equipment (CPE) due to customer convenience & availability etc.

We therefore suggest that the existing benchmark be revised to 95% in 7 days and 100% within 14 days.

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OTHERS:

We welcome TRAI initiative to do away with some of the parameters wherein all operators are meeting the prescribed benchmark. In this regard, we would also like to suggest that the same principle also ought to be extended to the parameters of **Call Set-up Success Rate (within licensee's own network) SDCCH/ Paging Chl. Congestion and TCH Congestion** for cellular mobile services, as in the case of these parameters too, virtually all the service providers have been meeting the prescribed benchmarks from last many quarters.