



Vodafone Counter to TRAI Consultation Paper on Review of Network Related Quality of Service Standards for Cellular Mobile Telephone Service dated 5 August 2016

We are pleased to submit our counter response to the comments received from various stakeholders on the consultation issued by the Authority on the above subject.

1. At first, we note that there are no comments from any consumers /consumer advisory groups to this consultation, which demonstrates that the QOS issue is confined only to small localized pockets and that the same needs to be identified and addressed on this basis, rather than reviewing the parameters/benchmarks for the entire network/service area.
2. We also note that there appears to be an overwhelming view amongst all stakeholders that the parameters should continue to be prescribed on a network/LSA level only.
3. In fact several stakeholders have highlighted the constraints of prescribing the benchmarks at a sub service area wise level citing the challenges being faced at the local area level. It is submitted that these issues were raised even earlier in response to the Authority's call drop consultation. We once again urge the Authority to address/deal the contentions of the stakeholders in a reasoned and transparent manner as has also been highlighted by the Hon'ble Supreme Court.
4. Further, we request for the Authority's support in addressing these concerns so that the common objective of providing quality services to subscribers can be achieved. We would like to once again record our appreciation for the Authority's support in addressing EMF related concerns and request that similar support may also be extended in addressing issues with local civic bodies, use of illegal repeaters, etc.
5. We also note that the Authority did not raise the issue of whether the QOS benchmarks should continue to be prescribed at a LSA level, rather the views of the stakeholders have been sought on the presumption that the decision of sub service area level will be taken by the Authority. The same is evident from the issue below:

In case QoS is mandated at a sub-service area level, which option (LDCA-wise or District Headquarter/ city/ town-wise or BTS-wise) you would recommend? Please comment with justifications.

Accordingly, we note that one stakeholder has simply responded from amongst the options tabled by the Authority and made their submissions on that basis.

6. It is our respectful submission that the key question of whether the QOS benchmarks should continue to be prescribed at a LSA level, ought to have been first raised by the Authority for stakeholders' comments, rather than proceeding on the presumption of a change to a sub-service area level.



7. We also note that almost all stakeholders have urged for continuing with the existing QOS benchmarks. It is respectfully submitted that it is the full intention and effort of Vodafone to ensure that our Network QOS performance is well within the benchmark levels prescribed by TRAI and our request to continue with existing benchmark levels is based on international best practices and ensuring regulatory compliance.
8. We believe that if the TSPs are meeting the benchmarks prescribed by the Authority (despite the constraints and challenges that the Authority is well aware of) then the Authority should support their efforts and continued compliance, rather than modify the benchmarks to make compliance more difficult. It is re-iterated that the issues are mostly at a localized level and we urge again for the Authority's support in addressing these external challenges. It is respectfully submitted that making the benchmarks more stringent will not change the ground realities.
9. We reiterate and emphasise that the RLT parameter is an internal network planning/configuration parameter and should not be prescribed as a QOS benchmark. We note that this parameter is not applicable to CDMA systems, and in case the same is prescribed only for GSM, it will result in uneven regulation. We would also like to submit that the proposal by some stakeholder for standardizing of the RLT benchmark /suggesting an optimum value, demonstrates lack of understanding on how networks are operated and managed.
10. The anomalies in the methodology in calculating the worst affected cell has been highlighted by some TSP stakeholders. It is reiterated that the current methodology adopted by the Authority does not identify consistently underperforming cells for corrective actions, which is the intent of the Regulation. We request the Authority to consider the submissions of the stakeholders in this regard and address this concern.

New Delhi
7 October 2016