

Dated 17<sup>th</sup> December 2012

Mr. Robert J. Ravi,  
Advisor (QOS)  
Telecom Regulatory Authority of India  
New Delhi

Dear Sir,

With reference to the Consultation Paper on Review of 'The Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006, dated 27<sup>th</sup> November 2012, inviting comments on the questions raised in the consultation paper, We submit our comments on the same as below:

**Question 1:**

**What are your views on imposing financial disincentives for delay in submitting audit reports of the metering and billing system and what should be the quantum of such financial disincentives? Please give your comments with justification.**

**Comments**

It is recommended that there should be clause for imposing financial disincentives for delay in submitting the audit report of the Metering and Billing System except where there is reasonable reason for non submission of the report on time.

The quantum of such financial disincentives should be at the rate of Rs. 50000/- per day in submitting the Audit report.

**Question 2:**

**What are your views on imposing financial disincentives for delay in submission of Action Taken Reports on audit observations of the metering and billing system and for providing false information or incomplete information and what should be the quantum of such financial disincentives? Please give your comments with justification.**

**Comments**

There should be a clause for imposing financial disincentives for delay in submitting the Action Taken report of the Metering and Billing System except where there is reasonable reason for non submission of the report on time.

The quantum of such financial disincentives should be at the rate of Rs. 50000/- per day in submitting the Audit report.

**Question 3:**

**What are your views on the proposal for audit of the CDRs for at least twice a year- three months CDR pertaining to first half year and three months CDR pertaining to second half year? Please give your comments with justification.**

**Comments**

For covering the reasonable number of subscribers CDR's, the audit of the CDR's should be conducted twice in a year, so that the problem of the archive CDR's is solved.

**Question 4:**

**What are your views on the proposal for simultaneous reporting of instances of overcharging to TRAI by the auditor, monthly progress report on the action taken by service providers on such audit observations and financial disincentives on delayed refund of such overcharged amounts? Please give your comments with justification.**

**Comments**

As if the audit of CDR's are conducted twice in a year the report on overcharging cases should be reported to the TRAI on half yearly basis, so that the action for correction should be taken on reasonable time.

**Question 5:**

**Do you support mandating service providers to undertake a thorough analysis of each audit observations and the requirement to furnish a detailed comment on each audit observation, as proposed above, including financial disincentives for submitting audit reports without adequate comments? Please give your comments with justification.**

**Comments**

Yes, it is suggested that the service providers mandatory undertake a thorough analysis of each audit observations and the requirement to furnish a detailed comment on each audit observation to ensure the corrective action should be taken properly on time.

**Question 6:**

**Do you support nomination of auditor by TRAI and appointment of the nominated auditor by the service provider? Please give your comments with justification.**

**Comments**

For the independent & transparent view of the audit working, the independent auditor for the Metering & Billing System of the different service provider should be appointed by the TRAI. If the auditor is independent, there must be a value addition in the audit working.

**Question 7:**

**What are your views on the proposal for fixing of remuneration of auditor by TRAI and what should be the quantum and methodology for computation of audit fees, in case the same is to be fixed by TRAI? Please give your comments with justification.**

**Comments**

The auditor remuneration should be fixed by the TRAI on the basis of quantum of the business of the service provider. Certain minimum and maximum amount can also prescribed for remuneration considering the smallness or very large size of base of subscribers / business.

**Question 8:**

**What are your views on the proposals relating to tariff plans to be covered for audit? Please give your comments with justification.**

**Comments**

For the better result, it is recommended that, to bring more transparency two / three plans of the six-months or at least one plan introduced in every month, with highest number of subscribers, is also covered in audit. As the data of the new plan easily available and any discrepancy arise in the new plan will be removed on time.

Please find the above in order for doing the needful

Thanking you,

With Regards,

Aditya Agrawal

(Mob. 9654486424)