

TRAI/Aircel/Corr/2013/

14th Aug 2013

Shri A. Robert J. Ravi
Advisor (CA & QoS)
Telecom Regulatory Authority of India
MTNL Telephone Exchange Building
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi – 110 002

Sub: Response to Draft Telecom Consumers Complaint Redressal (Second Amendment) Regulation, 2013.

Dear Sir,

This is with reference to "Draft Telecom Consumers Complaint Redressal (Second Amendment) Regulation, 2013." dated 30th July 2013.

In this regard, we hereby enclosed our response to the above mentioned draft amendment. The response has also been sent through e-mail at advqos@traai.gov.in.

We hope TRAI will take our inputs into consideration while formulating the amendment regulation.

Yours Sincerely
For Aircel Group



Ramesh K
Sr. General Manager – Corporate Regulatory Affairs

Encl: as stated above

Aircel Limited :

Aircel Group Response to
Draft Telecom Consumers Complaint Redressal
(Second Amendment) Regulations, 2013

48

Issues-wise Response

Proposed Amendment 1:

- in sub-regulation (1), after third proviso, the following proviso shall be inserted, namely:-
"Provided also that the Complaint Centre shall register appeal, if any, preferred by the consumer through Consumer Care Number."
- in sub-regulation (9), in clause (b), for the words "the broad categories of complaints and service requests", the words "appeal and the broad categories of complaints and service requests" shall be substituted.
- In regulation 9 of the principal regulations, for sub-regulation (2), the following sub-regulation shall be inserted, namely:-
"(2) A consumer may prefer an appeal under sub-regulation (1) either directly to the Appellate Authority through email or facsimile or post or in person, or through the Consumer Care Number of the complaint centre established by the service provider.
Explanation: For the purpose of this sub-regulation post include courier."

Aircel Response:

In this regard, we would like to state that while fax, post, in person etc is acceptable modes for raising of an appeal however, call to a consumer care number is not an acceptable mode for lodging an appeal. Appeals should only be allowed to lodge through written modes only which should clearly highlight the customer issue as well as detailed reason as to why he is not satisfied with the earlier complaint resolution.

You would appreciate that this reasoning is important in case of successfully closed complaints otherwise even if the appeal is decided as per internal norms, the customer would again land up as dissatisfied since, he may have been expecting resolution as per his own understanding.

Proposed Amendment 2:

- (b) for sub-regulation (5), the following sub-regulation shall be substituted, namely:-
"(5) Every service provider shall earmark or allot sufficient telephone lines or connections to be called "Consumer Care Number" and ensure that its Complaint Centre is accessible to its consumers in person as well as through voice call, SMS, email and post."

Aircel Response:

We agree with the proposal except for the SMS mode. , Our circle offices are always available for the customers accessing in person. With regard to SMS mode, it would not be possible to address customer complaints or appeals if it is received through SMS. It will lead to shortfall in details of event, which are required to resolve a complaint. This will in turn lead to more dissatisfaction & frustration at customers end and will not serve the purpose.

Proposed Amendment 3:

In regulation 7 of the principal regulations, in sub-regulation (3), in clause (b), for sub-clause (i), the following sub-clause shall be substituted, namely:-

“(i) communicate to the consumer, through SMS or email or post, the details of action taken on the complaint and the procedure for preferring appeal to the Appellate Authority; and”

Aircel Response: We agree with the amendment.

Proposed Amendment 4:

In regulation 14 of the principal regulations, for sub-regulation (4), the following sub-regulation shall be substituted, namely:-

“(4) On disposal of the appeal, the secretariat of the Appellate Authority shall intimate the decision, through SMS or email or post, to the appellant and the service provider.

Aircel Response: We agree with the amendment.

X-----X-----X