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Mr. Vamg

13 August 2013

The Advisor (CA & QoS)  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
Jawaharlal Nehru Marg, (Old Minto Road),  
New Delhi – 110002

Kind Attention: Mr. A Robert Jerard Ravi

Sub: Response to the draft Telecom Consumers Complaint Redressal (Second Amendment) Regulations, 2013

Dear Sir,

We would like to highlight following issues with regard to the draft Telecom Consumers Complaint Redressal (Second Amendment) Regulations, 2013.

1) Accessibility of the Complaint Centre to the consumers in person

- a) Currently, our complaint centers are regionally operated, wherein the complaints are handled in a centralized manner with each complaint centre managing complaints for more than one services area.
- b) We understand that there is a need to ensure accessibility of our complaint centre to the consumers in person at various touch points for receiving their complaints. The Authority would appreciate that same is rightly possible through our various touch points in the field such as My Idea / Idea Points etc. which are very much within reach of consumer as well.

2) Accessibility of the Complaint Centre of the telecom operator to its consumers through SM:

In this regard we would like to submit that it not realistic to follow the method of receiving complaints from the consumer **through SMS due to the following reason:**

- a) Each SMS would require to be eyeballed and tagged in specific category of complaint. This would require additional investments in terms of manpower, training and time. Also there are chances that customer may not be able to make the Service providers understand the crux of the issue and there might be undue delays in accepting, understanding and resolving the issue and eventually effecting the turnaround time for complaint resolution.
- b) Registration of complaints through SMS would be perplexing as it will be difficult for the operators to identify the nature of complaint.



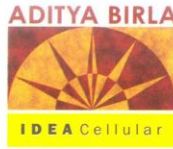
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- c) The complaints received on SMS may not carry the necessary details of the complaint, and operator will find it difficult to resolve the complaint. For understanding and resolving each such indistinct complaint, additional efforts such as call back to the customer would be required, which would unnecessary increase the quantum of work and slow down the resolution time.
- d) There is a strong likelihood for receiving non-genuine complaints i.e. various queries, junk, obscene and frivolous SMS etc., being sent by the consumers to our complaint center.
- e) The Authority would appreciate that currently, there are enough channels whereby a customer can register the complaint with their service provider such as Complaint center (Toll free198) / Web / Showroom / Email / Appellate Authority / CAG Member. Such channels are well publicized through various means like newspaper, SMS, Telephone bills, in built SIM feature etc.

**3) Acceptance of the Appeal through written communication**

- a) It has been proposed vide this draft amendment that the consumer may prefer an appeal either directly to the Appellate Authority through email or facsimile or post or in person or through the Consumer Care Number of the complaint center.
- b) We submit that all the modes as mentioned in the draft amendment are currently being practiced except for the Consumer Care number of the complaint center. We would like to recommend that Appeal to Appellate authority should not be taken on Consumer Care number of the complaint centre as upon taking the appeal on call, the voice of the customer is lost as it would be written by the agent based on his interpretation, hence taking appeal on SMS or call will dilute its sensitivity and/or the actual voice of customer.

We also request the Authority to kindly consider the practices followed in other Industries like Banking and Insurance sectors wherein appeals are taken in written form for all Ombudsman resolution which is similar to our Appellate Authority.

**4) Intimation of decision of disposal of Complaint**

We welcome the Authority's suggestion regarding intimation to the customer on disposal of the complaint through SMS as the same would be the most convenient and fastest mode for both the sender and receiver.

Sincerely Yours  
For IDEA Cellular Limited

  
Ajay Sharma  
GM – Corporate Affairs



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