



COAI response to the draft Telecom Consumers Complaint Redressal (Second Amendment) Regulations, 2013

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 of the telecom operator to its consumers through SMS for 1st Tier complaints as well as appeals:**
 - a) It has been proposed vide this draft amendment that all the telecom operators have to make sure that their complaint centre is accessible to its consumers in person as well as through voice call, SMS, e-mail and post i.e. operators needs to allow its consumer to lodge complaints through any of the above mentioned modes.
 - b) In this regard, we would like to submit that our member operators have made available multiple channels for subscribers to express his/her grievance and the same are listed as follows:-
 1. Call Centre number
 2. For UCC complaints - 1909
 3. Walk in complaint centres
 4. Walk in to any Store
 5. Letter (through post/courier/personal visit)
 6. E-mail.
 - c) Additionally, all operators work under the QoS benchmarks regulated by TRAI for call centre performance as well as turnaround time (TAT) for complaint closures.
 - d) We would also like to submit SMS is too short to file an appeal (limited to 160 characters) and hence the customer's grievance cannot be captured in this limited / restricted form. Free flow text in SMS cannot be allowed as this will not get properly understood when the message is received leading to further dissatisfaction among the customers.
 - e) Being an appeal, it is important customer voices his grievance in as much detail as possible (through email or letter) so that the views are correctly captured - if this is not done, the customer will feel disappointed that the TSP has not understood his / her problem or concerns and this will lead to further dissatisfaction which is not what the objective is.
 - f) Moreover, at the time of filing of an appeal, it is important for the service provider to know, in detail, why the customer is not satisfied with the resolution provided by the first tier mechanism of consumer care centre. We believe that this is only possible in a structured format where the relevant dates and other details are mentioned.
 - g) Further, many customers may like to file an appeal in regional languages which cannot happen through SMS and will have to go through the letter/ written communication route.

h) Thus, we request TRAI NOT to mandate the registration of complaints via SMS.

2) Accessibility of the Complaint Centre to the consumers in person:

- a) We agree to this clause of the draft Regulation that the operators would ensure accessibility of their complaint center to the consumers in person at various touch points. Further, we believe that our members can possibly provide the addresses and other details of their nodal offices in order to facilitate the accessibility of the complaint center to their consumers in person.

3) Acceptance of the Appeal through a 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) As stated above, it is important for the service provider to know, in detail, why the customer is not satisfied with the resolution provided by the first tier mechanism of consumer care centre. We believe that this is only possible in a structured format such as a letter/ e-mail/ fax/ courier and a voice call at customer care number may not serve the desired purpose.
- c) Hence, we would like to submit that there should be provision for the consumer to directly appeal to the Appellate Authority through written communication i.e. the consumer should make an appeal to the Appellate Authority only via a written communication.
- d) Thus, we request TRAI to allow ONLY the written communication (email, letter, fax) to be accepted as a model for making an appeal to the Appellate Authority.
