

MTNL/RA/TRAI CP-04 /2015  
Dated 21.09.2015

To,

The Advisor (TD & QoS)  
TRAI, New Delhi

Sub. : Comments on TRAI Consultation Paper on “compensation to the consumers in the event of Call Drops”, dated 4th September, 2015.

The TRAI issued above referred Consultation paper on 04.09.2015 on the aforesaid subject and asked the various stakeholders to comment on the issues involved in the consultation paper. In this regard the following is submitted for consideration:

**Q1. Do you agree that calling consumers should not be charged for a call that got dropped within five seconds? In addition, if the call gets dropped any time after five seconds, the last pulse of the call (minute/second) which got dropped, should not be charged. Please support your viewpoint with reasons along with the methodologies for implementation.**

**MTNL Comments:**

The call drops in any network are inevitable and TRAI’s QoS parameters allow 2% margin for call drops. As call drop information is not part of the charging systems therefore, the calls of duration of 5 sec or less not to be charged or making the last pulse free is not technically feasible. Therefore we do not agree that the calling customers should not be charged for the call that got dropped within 5 seconds or more. Telecom operators design RF network based on estimated RF path losses from user to Base station on uplink and base station to user on downlink. Many factors affect RF signal coverage like clutter, terrain, frequency of spectrum, user terminal type, proximity to tower etc. To support this, the reasons are given as below:

### **1) Mobiles comes with varying receiver sensitivity:**

Receiver sensitivity is one of the key performance measuring parameters for any mobile handset. The bad receiver sensitivity causes issues like handover failure, call drops & poor voice quality. The better is the handset sensitivity, better will the receiver performance. Since handsets come with varying receiver sensitivity, at the same place , a customer with better receiver sensitivity will not face call drops issues as compared to the customer having mobile with poor receiver sensitivity.

### **2) High penetration losses in urban areas:**

In urban areas, like metro cities owing to high rise buildings with uneven clutter and structures of public places like Malls, cinema halls, hospitals having thick clutter, the signal cannot successfully penetrate in every nook and corner of the buildings.

Very High dense urban buildings, congested commercial areas of Metro cities, heritage buildings in important commercial area have thick walls and offer high attenuation to electromagnetic signal, resulting in low indoor signal level, causing call drop. So it would be highly challenging to provide 100% coverage. So there will always be some spots where the service provider network would be absent leading to call drops.

Sudden fading, due to users moving inside elevators and other closed areas, will change RF characteristics and could cause call drops.

### **3) Multiple factors not in control of Service provider:**

There are multiple factors which lead to call drops, some under control & some not in control of service providers like spectrum availability, cheap wideband boosters, and site's exit due to EMF concerns. It is not practical to differentiate call drops based on such factors. Hence blaming the service provider only for the poor retain-ability is not justified.

Telecom operators maintain the network as per TRAI benchmark for call reliability with less than 2% DCR. Operators are under obligation with latest stringent directions to meet all TRAI QoS parameters in every district area, which would further reduce dropped calls in network and customers will experience better performance.

Operator controls on call drop issues are limited to following items:

1. RF network coverage and optimization.
2. Call drop KPI analysis.
3. Handover success rate and neighbor list optimization
4. BTS Power audit.
5. CBBH traffic analysis and addressing DCR cell faults.

6. Limiting hardware faults, link fluctuations, VSWR faults and congestion.

In view of continuous efforts in addressing above issues and maintaining network within TRAI benchmark for call drop, compensation for call drop is not practical.

Further, perception of call drop differs with customer assuming call drop, though call released abruptly by other user or due to other operator network and end up in compensation claim in originating call network.

As per above submission, it is suggested that for the instances of call drops beyond the control of TSP, penalizing TSP will not be justified/fair. Further such clearly unidentifiable reasons of call drops will lead to disputes and may disturb the business environment.

For specific subscribers, complaining overcharging (for high rate plans), the subscribers may be advised to migrate of pay-per-second plans, as such plans will not cause any financial loss to subscribers even in case of call drops.

Hence, present status of charging dropped calls should be continued without any change, as mobile network in India is matured.

**Q2: Do you agree that calling consumer should also be compensated for call drops by the access service providers? If yes, which of the following methods would be appropriate for compensating the consumers upon call drop:**

**(i) Credit of talk-time in minutes/ seconds**

**(ii) Credit of talk-time in monetary terms**

**(iii) Any other method you may like to suggest**

**Please support your viewpoint with reasons along with the methodologies for implementation.**

**MTNL Comments:** As per above submission in Q1, MTNL suggests that no further compensation should be provided to calling subscribers for call drops.

**Q.3: If the answer to the Q2 is in the affirmative, suggest conditions/limits, if any, which should be imposed upon the provision of crediting talk-time upon call drop and usage thereof.**

**MTNL Comments:** Not applicable in view of the answer provided in Q.2.

**Q4: Is there any other relevant issue which should be considered in the present consultation on the issue of call drops?**

**MTNL Comments:** The following points may be considered:

1. It may be advertised by concerned authorities that radiation from cell towers is not harmful which shall facilitate installation of more towers.
2. TRAI may advertise in print and electronic media indicating that use of unauthorized repeaters is a punishable offence.
3. The concerned authorities should coordinate with civic bodies to arrest ceiling of towers which is the main source of call drops.

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