---- Original Message -----

From Avick Chakraborty <avickc@gmail.com>
Date Sat, 05 Sep 2015 08:20:36 +0530
To advfea1@trai.gov.in
Subject Attn. Smt. Vinod Kotwal, Advisor (F&EA) - Response to Consultation Paper on Compensation to the Consumers in the Event of Dropped Calls

Respected Madam,

Please find below responses to the questions posted in the consultation paper.
I am an Individual, Indian. I have registered on TRAI website. However, the login is not working at the site due to a technical glitch. However, I am sending my comments though mail for consideration and inclusion for comments and counter comments:
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.
Response:
There are two kind of call drops. The consultation paper talks about one, but ignores the other which is a major chunk of the call-drops those are unaccounted.
First type of call drop (say, Type-A) is as described in the consultation paper - when the call drops without any voluntary termination/disconnection by subscriber. This is counted. However, there is another type (say, Type-B) of induced or forced drop due to call quality getting deteriorating after some duration of the call and the subscriber is forced to disconnect the call with a "I will disconnect and call back that may make the call quality better" frustration. I think when people and parliamentarians talked about call drops, they mostly meant the second type as call drops. As in this case, the call gets disconnected by the subscriber due to bad/deteriorating call quality, IMO, technically it is not counted as call-drop by the operators and are excluded from reports. Even-if they claim it to be included, there would be extremely difficult to verify as there are subjectivity/interpretation involved in determining subscribed initiated termination of call due to bad call quality. This type of call-drops must also be addressed.
Solution: For Type-A of call drops, I agree to the proposed measure in Question-1. However as this will not take care of Type-B of call drops those are practically majority of call-drops, as an additional measure, operators must be directed to charge the consumers ONLY on Actual Bulk Seconds Consumed. This may mean a forced per second tariff for all the plans. Per Minute billing is anti-consumer for Type-B of call drops even after proposed measures in Q1 of the consultation paper.

Q2: Do you agree that calling consumers should 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
Response:
As described in my response to Q1, there are two types of call-drops. Type-A and Type-B.
For Type-A of call drops, measures of Q2 will be applicable, but for Type-B of call-drops, this measure may be subjected to dispute as it will be difficult to prove, hence needs a different approach to address. I will give responses separately for Type-A and Type-B:
Type-A: The proposed measures of penalty sounds too steep a penalty to operators. I would propose a credit of 50% of the bulk seconds consumed before the call drop to the consumer as penalty instead of full credit of the talked seconds. However, to be fair to operators, the credited seconds can only be used to call the same number(s) dropped earlier. So that when the subscriber makes next call(s) to the a dropped number, credit from dropped seconds will be used, not for other calls. Here also per second charging for

all tariff plans bring in clarity for this penalty and fairness of consumption of penal seconds as well.
Type-B: As this is subjective and the forced drop was actually initiated (call termination) by subscriber out of frustration, the natural tendency will be that the subscriber will try to call the same called number (forced to terminate) again. Steep penalty here will be subjected to disputes, may be unfair to operators and prone to misuse by a section of subscribers. However a nominal penalty of 10 seconds of credit should be given, if a subscriber calls same number as consecutive call within 60 seconds of termination of last call to a number which can be considered due to forced call-drop/termination. However, this 10 seconds can not be carried forward and must be consumed in the ongoing consecutive call for a call duration of 20 seconds or more otherwise only 50% of actual consumed seconds credit will be given. For example, if he makes a call only for 14 seconds in next call to same number within 50 seconds of termination of last call, only 7 second (50%) credit will be used and 7 seconds will be charged. Instead, If he makes 21 seconds of next call, he will be charged only for 11 (21 - 10 credit seconds).If the call drops again (Type-B) and subscriber calls the same number again in next 50 seconds a upfront 10 seconds credit for that next call will be available as penalty seconds credit which must be consumed in same call or will lapse and so on. As 10 seconds is too small, I think a bad/over-smart subscriber will not be willing to misuse this comparing against the inconvenience of calling again and spending time to get connected.

Q3: 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.
Response:
Noted in response to Q2.

Q4: Is there any other relevant issue which should be considered in the present consultation on the issue of call drops?
Response:
The paper talks about Call-drops, but misses another very relevant "drop" today. This is net connectivity drop. When a user tries to load a webpage, he starts consume data. However, if the net connection drops while the page is being loaded, he looses most of the data consumed so far while loading. A fresh duplicate data is consumed for same page load next time due to the drop. Though some systems has the cache mechanism than reduce some loss, a large data is lost despite that. TRAI must initiate consider to address that data loss. In the interim, all operators must be asked to charge only per byte of data data consumption and not currently as charged causing loss to consumers.