Nishthaa India is an initiative to make citizens' voice matter in the functioning of the government they choose. It is a Trust of journalists, public intellectuals, administrators, lawyers, and professionals from corporate India. It seeks to expose big-ticket corruption, demand better governance, evaluate policy priorities and ignite public discourse on state institutions and their performance. Essentially, it exhorts us "to be the change we want to see in the world".

Following is our point-by-point input to the Consultation Paper on Compensation to the Consumers in the Event of Dropped Calls dated 04.09.2015.

Section	Nishthaa Inputs
2.13 & 2.14	As per drive test results none of the TSPs except one were found to be within the prescribed benchmark of <=2% for call drop rate yet all the TSPs have reported their compliance to TRAI. This clearly highlights the shortcomings of the reporting mechanism currently in place. It can be easily argued by TSPs that the reports were submitted for the entire network while Drive Tests were only performed to cover a small part of the network. The method of quarterly reporting of QoS parameters by TSPs to TRAI is insufficient to handle the complexity of the issues involved and is outdated. TRAI should implement an on-line network-monitoring portal. This is a browser-based portal that makes network parameters of all TSPs of all circles visible to TRAI in an on-line manner. Such a portal can simply be developed by TSPs so that they allow a view to TRAI of their on-going network performance. These systems already exist with all TSPs and reputed equipment manufacturers like Ericsson, Nokia, and Huawei etc supply them. The network data can be organized and analyzed on a per-circle, per-cell or collection of cells, per time duration basis etc. TRAI can also dwell deeper into precise reason for the call-drop as reported by the wireless (GSM/CDMA/WCDMA/LTE) system. These systems report detailed reasons for any abnormal call terminations. Typically the system reports even more details than what is enumerated in section 2.9. TSPs already have all these parameters in their network. All they need to do is to consolidate the data in the format prescribed by TRAI in an on-line system. We believe that this can be done very quickly with minimal investment required from both TRAI and TSPs.
2.18	We agree that investment in network infrastructure must keep pace with the growth in traffic. TSPs must invest back increasing revenue back into the

	network so as to ensure that they comply with all QoS parameters prescribed by TRAI. The penalties stipulated by TRAI for violating the QoS parameters are miniscule when compared to TSPs annual revenue. TRAI must exercise all other powers at its disposable to ensure that TSPs would face severe penalty when they either violate the QoS norms or report artificial inflated compliance to the QoS norms. We believe that later is the case more often than not. On-line monitoring suggestion made above would address this issue.
Q1:	We agree but our view is even more stringent than what is suggested here. As noted in 2.21, 71% of the mobile consumers are on per-second billing. These consumers would not get any benefit from the proposed scheme in Q1. TRAI should arrive at certain duration of an average call across India from the information furnished by TSPs. This information should be published annually by TRAI. Let us assume that for 2014, it was 120 secs. Then any dropped call within first 120 secs should not be charged at all. If a call drops after 120 secs, then call can be charged normally without the last pulse of the call. TSPs implement billing either using post-paid billing system or an on-line prepaid billing system. In either of the two cases, system can be easily configured to indicate in the CDR (Call Data Record) that this call terminated abnormally. The billing systems (whether pre-paid or post-paid) can then easily apply the billing algorithm suggested above. TRAI should publish the average call duration on an annual basis, which would take care of the changing consumer behavior so prevalent in mobile communication.
Q2:	Yes calling consumers must be compensated for call drops by TSP. The most preferred scheme for both consumers and for TSPs will be (ii). In India, 95% or more are prepaid consumers. They understand the concept of *balance* in their account very well. So if there is any dropped call, they should get a credit into their *balance*. They can see this balance going up and would know that they have actually received the credit for the dropped call. All TSPs have Pre-Paid systems and they can easily implement such a scheme.

	For simplicity, TRAI may specify representative tariff to be Rs. 1 as compensation for all dropped calls. We have already suggested a revised billing scheme for the dropped calls. In addition to the revised tariff scheme as suggested in Q1, a compensation of a certain fixed amount (irrespective of the call duration for the dropped call) should be provided to the consumer. If TRAI observes that TSPs collectively or individually are not reducing their call drop rate, it can revise the fixed compensation from Rs. 1 to any higher (or lower amount) if required.
Q3:	In our opinion, if cost of a call that drops mid-way through the conversation is adjusted as suggested in Q1 and a fixed compensation of a certain amount, irrespective of the duration of the dropped call, is given to consumer, it should be sufficient for the consumers.
Q4	Currently due to high call drop rate, consumer is the only party that is suffering. We have to create sufficient incentives for TSPs to reduce their call drop rate. In summary, this can be done by the following measures: 1. On-line monitoring of QoS parameters by TRAI and imposing penalties as per rules on TSPs that violate the QoS norms. The paper-based reports can be done away with completely. This way TSPs would know that their networks are being monitored by TRAI and they can't hide behind differing interpretations of various QoS parameters and also masking the underlying issues by taking averages over a large number of cells within a circle. 2. Lost revenue due to revised tariff schemes for dropped calls as proposed in Q1. 3. Additional cost of compensating consumers as proposed in Q2.

The information presented here is from Nishthaa. For any further discussion, we can be contacted via phone/email at the contact information given below.

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