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To,

**Shri Asit Kadyan,**

**Advisor (QoS),**

Telecom Regulatory Authority of India,

Mahanagar Door Sanchar Bhawan,

JawaharLal Nehru Marg,

New Delhi – 110 002.

**Sub: Consultation Paper on "Review of the Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006"**

Dear Sir,

This is in reference to your above-mentioned consultation paper. In this regard, please find enclosed our response for your kind consideration.

Thanking You,

Yours' Sincerely,

For Bharti Airtel Limited



Rahul Vatts

Chief Regulatory Officer

Encl: a.a

**Bharti Airtel's Response to TRAI's Consultation Paper on Review of The Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006**

We thank the Authority for providing us with an opportunity to present our views on the Consultation Paper "**Review of The Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006**".

Since inception, TRAI has issued various Regulations /Directions to ensure a balance between TSPs requirement for flexibility & freedom to design tariff offerings and market dynamics.

The Code of Practice of Metering and Billing structure has been well designed while keeping in mind the entire life cycle of a customer covering the onboarding process, usage parameters, metering, charging, billing, complaint handling, communication modes etc. Nevertheless, it is worth adding that over the years, even Service providers have also been working on certain stipulated processes to maintain rationality with TRAI regulations/directions, align the objective of bringing uniformity, transparency in their efforts while meeting the standards of accuracy and reliability. Keeping in mind the customers' overall interest, regular assessments of performance with internal and statutory audits are done to minimize incidence of billing issues and process gaps.

Telecom markets are in a continuous state of evolution and are subject to rapid variations basis customer preferences/ popularity of certain services/ social causes etc. Due to lockdown /Covid -19 situations, we have witnessed the paradigm shift in customer choice for telecom services. The services have become as necessary as livelihood, whether it is data usage, data speed, bandwidth, or connectivity due to the increased need for online studies, WFH, or entertainment. Consumers have fully accepted all aspects of telecom, and the service providers have proven themselves to make consumer-friendly prepositions in no time to match market synergies. All these have been possible due to the flexible approach of the Authority.

**Hence, we believe that TRAI's extant guidelines are sufficient and adequately protect the customers' interest.** The TSPs also adhere to the TRAI's guidelines to ensure compliance management and consumers' interest. Further, **any intrusive regulatory framework would be against the Authority's own stated and practiced light-touch regulation policy and would be counterproductive.** Any major changes in well-established regulations may also create unnecessary hindrances. Additional provisions relating to metering & billing processes, excessively or unreasonably, shall restrict the ability of TSPs to carry on its business. In case, post the consultation process, the Authority believes that any additional changes are required in the Metering & Billing regulation, we request that the draft regulation be put up for the

consultative process. The feasibility and resources required may be duly deliberated with the stakeholders before coming up with a final regulation.

In this backdrop, we would like to make the following submissions on the issues raised in the Consultation Paper. We hope that the Authority will consider the submissions favorably.

**Q.1: What changes are suggested in the sampling methodology in order to make it more representative of the post-paid and prepaid user segments or different types of tariff plans? Should the full spectrum of tariff plans be subject to audit? What considerations are required to be taken to address the issues or concerns related to the incidences of wrong charging especially in case of data packs, STVs, multiple tariff packs at a time, etc.? Please give your views with detailed justification.**

**Bharti Airtel's Response:**

We have different categories of products, like Plans/ STV/ Top-up /Combo Vouchers. While we take samples from each category of product, the count is not proportional to the base in each category. As mentioned by the Authority, both prepaid and post-paid services have disproportionate subscription levels, market share, ARPU, charging, and customer scenarios. Hence it will not be advisable to treat the scope of both segments similarly.

Basis current market trends, the major gross adds are on Unlimited products, where there is technically no metering or billing. Hence we should make the audit process much simpler rather than getting into concepts of Plans, Packs, STV, Combo etc. Ideally, we should restrict to top 3 unlimited prepaid products & top 2 Postpaid subscribed plans during the quarter.

Accordingly, It is suggested that auditors should select a total of top 5 tariff offerings across all the categories in the quarter to conduct the audit. This will ensure that the purpose of the Audit is adhered to while limiting the number of offers being selected therein. Also, focusing on the most popular tariff offerings will give maximum purview to cater to the concerns related to wrong charging incidences. The suggested changes will also be in line with the current market dynamics of tariff offerings while making the audit procedure simpler.

**Q.2: How IT tools and new technologies can be used to adopt preventive and proactive ways to avoid occurrences of error in charging or wrong configurations leading to charging? Whether the IT capabilities of other systems available with the service provider may be made available to the auditor for audit purposes? How such tools developed for rigorous testing before launch of new tariff plans can also be used for audit purposes? Please give your views with detailed justification.**

**Bharti Airtel's Response:**

Basis the current process, service providers provide the rated CDRs and the post mediated CDRs to the auditor. Auditors devise rating algorithms to rate post-mediated CDRs and match the amount such derived against the service provider's rated CDR.

Keeping the process aligned, it can be advised to all empanelled auditors to use standardized tools. However, it should be different from TSPs' IT tools to cross-check the mechanisms and gauge / identify the process gap in the Metering and Billing systems of the TSPs.

Additionally, Bharti Airtel, as well as auditors, rely heavily on IT tools, software and rating engines to arrive at discrepancies/clarifications etc. There is no other alternative to identify issues without technical support.

Bharti Airtel has invested significantly on technical billing solutions from global giants such as Ericsson, IBM etc. which are completely automated and seamless. It is not possible to make these billing systems available to auditors, as this would essentially mean delinking the automated process and making manual tweaking changes in production, which might result in actual billing issues.

Hence it would not be feasible for TSPs to share an internal system with auditors for testing. Rather, it should be conveyed to auditors to use / upgrade their own tools to match the respective TSP's IT capabilities. The TSPs will ascertain that wherever extended support is required to the auditors, the same is provided to them while sharing the required data, as is done presently.

**Q.3: With the evolution of new technologies and mediums to provide information related to terms and conditions, tariff details to the customers at the time of subscriptions or making it available as and when required by the customers, what changes are required to assess delivery of information in timely and appropriate manner? Please give your views with detailed justification.**

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**Q.4: What IT-enabled measures need to be considered to ensure consistency of the tariff information across the different channels or mediums? Please give your views with detailed justification.**

**Bharti Airtel's Response:**

We want to submit that the existing measures prescribed by the Authority for information dissemination are adequate to ensure transparency, enable customers to make informed decisions about telecom services, and protect their interest.

Keeping the new technologies and mediums, it is pertinent to mention here that we are transparently informing all on-offer customer tariffs on various platforms such as the Company website, Company Mobile App, Point of sale (retail outlets) in a straightforward and customer friendly manner with complete details of the offerings. Our website and Mobile App are specially designed to present a similar view of the tariffs across the customers' platforms.

Further, as stated above, TSPs have adopted several initiatives to enhance transparency while providing customer service. For example, Airtel has an application called "My Airtel", whereby its customers can easily access details regarding the tariff plans they have subscribed to, their usage pattern for voice/ data, their billed /unbilled amounts, the tariff plans offered in their service area and opt for any change in their tariff plan as per their requirements. For customers with feature phones, such facilities are available on the "self-care" menu designed for them. Further, there is no change in the circumstances that warrants any change in the existing norms, including formats prescribed by Authority or adopted by TSPs in various other modes.

Many customers are transacting through online channels like App/Web. The product benefits are available for customers on-screen and at the click of the button. For customers who choose to transact at retail stores, the same information is provided in the form of printed materials available at the point of sale. As per the process, after recharge, the same information is also provided to customers via SMS.

There are clear regulations to ensure that relevant and clear information is presented to the customer during and after a transaction is executed. Further, we are delighted to welcome TRAI's new directions dated 18<sup>th</sup> September 2020 on tariff publications, which will further streamline and standardize the information given to the customers during any transaction.

Hence, the currently prescribed medium of information is sufficient to ensure the timely delivery of information appropriately and cover the necessary information that is delivered to customers regarding any product offering.

**Q.5: What changes are suggested in handling of billing complaints? Whether defining what constitutes billing complaint may help in bringing uniformity? Whether higher**

**frequency of audit of complaint handling would help in improving effectiveness of complaint redressal mechanism? Please give your views with detailed justification.**

**Bharti Airtel's Response:**

We have a robust process for complaint redressal to handle customer grievances. Wherein Customer can raise a billing complaint through different channels or modes such as Airtel Thanks App, Contact centers, Airtel stores & E-Mail. Once the customer has raised a billing complaint, he would get a service request number along with the defined turn-around time to track the complaint. Once the complaint is resolved, we send communication to customers informing the resolution of the complaint.

It is a recognised fact that many of the calls received from the customers at the call center pertain to the queries about their billing and not a complaint about details of additional charges, usage related information, bill generation issue etc. For example: a customer may contact the TSP for a billing issue, which may be in the nature of a complaint or a query. When a customer calls at customer care for a billing issue, basis the customer's VOC, the advisor follows the Decision Tree. The Decision Tree is an SOP for the advisor, which guides him to follow the correct steps for resolving the customer's issue as per below:

1. Query/Clarification – Advisor would understand the customer's VOC, follow the Decision Tree, and explain the bill to the customer for resolution.
2. Complaint - Advisor would understand the customer's VOC, follow the Decision Tree and accordingly raise a billing complaint to the backend team for waiver or bill correction and also for fixing the gap so that subsequent bills are correctly generated. The customer is also conveyed the TAT for closure by the advisor, and the complaint is close-looped with the customer on closure. As an additional step, the complaint is also investigated to identify if it has a mass impact for proactive rectification of the same for the entire impacted base.

Further, to address general queries, we have also given the customer an option for raising billing complaints through the digital mode such as Airtel Thanks App.

Further, we are working on building the different billing complaint scenarios on the Airtel Thanks App itself, which will clarify billing details to customers such as pro-rata rental billing, VAS charges, etc. If the customer still has an issue, he can go ahead and raise a billing complaint. We would also be building such automation in our Decision Tree to help our advisors to handle customer issues.

In case the customer's complaint is still not resolved, the customer has an option to re-open a complaint. Beyond this, customers can even escalate this further to Nodal & Appellate officers.

Further, we suggest keeping a forum with all TSPs to understand the respective complaints redressal systems and practices. With this approach, all the TSPs will get an opportunity to adapt themselves to the industry best practices and move towards a uniform complaints redressal process across operators.

Airtel as an organization is focused on Zero Complaints, and we are aggressively driving this to bridge the gap. We believe that the current method of the audit is giving a fair picture of the process. Thus, we believe that the guidelines of complaint handling, as mentioned under the 'Code of Practice for Metering and Billing Accuracy Regulations, 2006, are well prescribed and are comprehensive enough to deal with the issues related to billing complaints.

**Q.6: To conduct special or peer audit, where old records might be required to carry out the audit, what may be prescribed to ensure that the relevant details are maintained for sufficiently long period and made available to the auditor in a timely manner for conducting the audit? Please give your views with detailed justification.**

**Bharti Airtel's Response:**

As prescribed in the Code of Practice, the existing Metering & Billing Audit process is very extensive and voluminous in nature. We have been following dedicated systems/processes and manpower resources for the smooth functioning of the current audit process. Metering & Billing Audit is a year stretched activity that starts from Auditor selection to fulfillment of IDR, conducting the audit, CDR extraction, billing dump, CDR analysis, validation, sharing resources, refunds management, and filling of voluminous reports for each service area wise/technology wise apart from action taken reports for each service area separately. Therefore, it isn't easy to accommodate another similar line of Audit that to of past audit years.

Retrieving old data for any audit requirement will be a serious drain on resources and time, which would be more of a postmortem without any benefits. If the audit period for the special audit is more than a year prior to the current date, the extraction for such old data is done from the archives maintained on Tape drives. Extraction of Data from tape archives is a very lengthy and time-consuming process and is the primary cause for delays.

To conduct such audits in a timely and efficient manner, we recommend that special audits be conducted in a planned manner on the data already extracted for any previous audits. Such

data pertaining to prior audits can only be kept for a limited period. To cater to this requirement & to ensure faster data retrieval, we can ensure that data/artifacts which are extracted basis the quarterly audits for the previous 2 years audit can be separately stored at a designated location for a specific period basis the confirmation from TRAI over the retention period and retrieved quickly for conducting the special audit.

Therefore, we recommend that special audits be conducted in a planned manner on the data already extracted for any previous audits in the last 2 years or on the current / last quarter data only.

**Q.7: Should the Regulation 6C, Regulation 6D and Regulation 6E of the regulations dealing with consequence for failure of the service providers to submit audit report and action taken report, consequence for failure of the service providers to refund overcharged amounts to customers and consequence for failure to provide comments on audit observations in the Action taken report respectively be retained as it is or they need to be altered/strengthened.PI support your views with rationale.**

**Bharti Airtel's Response:**

We believe in adherence to the practices as introduced by the Authority. TRAI would also appreciate that TSPs always comply with various reporting and compliance requirements to the provisions of TRAI stipulated regulations, directions, and orders. However, financial disincentives come in bad taste in this process as it tends to penalize for any delay in timelines despite honest intentions and total compliance.

In our case, we have been operational in 22 wireless circles and 15 wireline circles. The complexity of voluminous final reports & the Action Taken Reports is well-identified. There might be a situation for TSP wherein reporting requirements can be breached due to unavoidable reasons. Keeping in mind the quantum of financial disincentives for non-submission of final reports and ATR, Rupees 1 lakh and Rupees 10 Lakhs respectively for each report, the quality and adherence to compliance might be comprised.

The Authority may use its discretion, keeping in mind the good intention of service providers towards its customers and TRAI specified compliances. Accordingly, the timeline to submit various reports should also be reviewed to give a sufficient compliance period in exceptional cases.

Further, processing of refund takes time due to operational constraints, and there is no deliberate attempt to delay the refund. The key reasons for the delay have been explained



earlier also to the Authority that the process of refund posting generally revolves around a large volume of CDRs which had to be extracted from our archived records and then further analyzed to determine the count of unique customers who had to be given the refunds as well as the determination of the amount of refund. Therefore, we would like to reiterate that to levy a financial disincentive of an equal amount of the refund would be unfair, and TRAI should review the regulation.

In the past, TRAI had reviewed various financial disincentive regulations and have prescribed the graded penalty provisions. We suggest that the graded financial disincentive should be applicable in the case of M&B Audit regulations.

**Q.8: Any other issues which are relevant to this subject.**

**Bharti Airtel's Response:**

**NA**