



COAI Response -
TRAI Consultation Paper on Reivew of the
Standards of QoS of Basic Telephone Services
(Wireline) and Cellular Mobile Telephone Services

12th June 2014



I. Preamble:

Over the years, competition has increased in both fixed line and mobile telecom service in India. The level of competition in India is far higher than witnessed in any other part of the world. Further, the sector is characterized by very low ARPU and tariffs that are the lowest in the world. In fact, it is this affordability of mobile services that is driving the take up and usage of service.

In such a scenario of intense competition, every service provider is making an all out effort to retain existing subscribers and increase market share. The endeavor of every service provider is to provide best quality seamless service to their subscribers. Hence Quality of Service (QoS) is driven by market forces rather than by Regulatory intervention.

In light of the same, we would like to respectfully submit that as the competition increases and market evolves, Regulator needs to move towards a regime of forbearance with regard to QoS for Mobile & Fixed line services.

Even internationally, mostly the regulators do not specify the QoS parameters. They either stop regulating when there is enough competition or they just monitor QoS parameter.

In the case of India as well, we are of the view, that in the prevailing market environment, the approach of light touch Regulation with regard to QoS should be adopted by the Authority.

In light of above, we are giving below our comments on the various issues raised in the consultation paper:

II. Issue Wise Response:

Benchmarks Related to Basic services

Q1: In your view, does the benchmark for the parameter “Fault incidences (No. of faults/100 subscribers/ month)” for Basic Telephone Service need revision? If so, what should be the benchmark? Please give your comments with justification.

COAI Comments:

- a) As has been highlighted by TSPs to the Authority, TSPs face practical difficulties when underground cables get damaged due to regular development work undertaken by civic agencies.
- b) There are other practical problems also such as cables being stolen and cables in costal areas getting corroded.
- c) In light of the above, we suggest that this benchmark be relaxed and modified to $\leq 10\%$.

Q2: In your view, does the benchmark for parameter “Fault Repair by next working day” for Basic Telephone Service need revision? If so, what should be the benchmark for faults repaired by next working day and by 3, 5 or 7 days? Please give your comments with justification.



COAI Comments:

- a) There are several practical problems faced by TSPs at the time of fault repair. These problems include, permission not granted by civic agencies for digging, delays faced in procuring required materials etc.
- b) Moreover, complaints booked late in the evening by the customers are taken-up the next day and on several occasions, when TSPs visit customer premises, the customers are not at home. All these issues add to delays in fault repair.
- c) Hence, these benchmarks should be relaxed to
 - i) **For urban areas:** By next working day: $\geq 70\%$; within 3 working days: 80%; and within 5 working days: 98%;
 - ii) **For rural and hilly areas:** By next working day: $\geq 70\%$; within 3 working days: 80%; within 5 working days: 90%; and within 7 working days: 98%.

Q3: What are your views on relaxing the benchmark for parameter “Mean Time to Repair (MTTR) to ≤ 12 Hrs” for Basic Telephone Service? Please give your comments with justification.

COAI Comments:

- a) As highlighted in our response above, given the delay in getting the permission from local bodies and in procuring the material, this benchmark should be relaxed to ≤ 12 hrs.

Q4: What are your views on removing the parameters for Basic Telephone Service (a) Call Completion Rate (CCR) within a local network or, (b) Answer to Seizure Ratio (ASR) from reporting of compliance to TRAI? Please give your comments with justification.

COAI Comments:

- a) We agree with the Authority, that since most of the operators are meeting the benchmarks prescribed for CCR and ASR, performance against these may not be reported to TRAI and may be left to TRAI to monitor.

Benchmarks Related to both Basic & Cellular services

Q5: In your view, does the benchmark for parameter “Resolution of billing/charging complaints” for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.

COAI Comments:

- a) There may be unforeseen circumstances, by virtue of which, operators may not be able to resolve all the billing and charging complaints within 4 weeks.
- b) Hence, the existing benchmark of 100% within 4 weeks should be relaxed to 98% within 4 weeks.



Q6: In your view, does the benchmark for parameter “Period of applying credit/ waiver/ adjustment to customer’s account from the date of resolution of complaints” for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification

COAI Comments:

- a) It may not be possible to apply a credit/ waiver adjustment to customers account in 100% of the cases within one week of resolution of complaint. There may be a few cases where the credit/ waiver adjustment cannot be applied within one week.
- b) This is due to the fact that the internal process within the organization takes time to clear/adjust the payments and refund the same. In addition to this, the contractual obligation with international operators suggests that the timeframe to provide the TAP files is of 30 days, thereby making it difficult to meet the existing benchmark
- c) Hence we suggest that this parameter be relaxed to 95% within 7 working days of resolution.

Q7: In your view, does the benchmark for parameter “Percentage of calls answered by the operators (voice to voice) within 60 seconds” for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Can the ‘Percentage of calls answered by the operators (voice to voice)’be made within 90 seconds instead of 60 seconds? Please give your comments with justification.

COAI Comments:

- a) All operators have invested heavily in providing state-of-art customer care facilities so as to provide enhanced customer care experience to their respective subscribers. However, over the years the number of subscribers has increased manifold, thereby increasing the load on call centers.
- b) We request that, for both basic and mobile services, this benchmark be relaxed to “Percentage of calls answered by the operators (voice to voice) within 60 seconds” to $\geq 60\%$, in line with the benchmarks prescribed under broadband services.

Q8: Shall the benchmark for parameter “Termination/ closure of service” for Basic Telephone Service and Cellular Mobile Telephone Service be revised? If so, what shall be the revised benchmark? Please give your comments with justification.

COAI Comments:

- a) TSPs make efforts to retain subscribers. Hence “Termination/ closure of service” for Basic and Mobile subscribers may not be possible within 7 days in all cases.
- b) We therefore request that this parameter be relaxed to 95% within 7 working days of registration of request for closure of service. This will also provide opportunity to service providers to retain customers.

III. OTHER COMMENTS:

1) Reporting Requirement of some parameters need to be removed

- a) As highlighted in the preamble, we are of the view that in the prevailing market environment of high competition in India and with MNP in place, it is imperative for the every service provider to provide best quality service to their subscribers in order to survive in the market.
- b) Thus, we are of the view TRAI should move towards light touch Regulation with regard to QoS and aim to progressively reduce the QoS parameters being reported by Mobile operators to TRAI.
- c) In this regard, we would like to highlight that there is no need to prescribe QoS standards for the Connection Establishment (Accessibility) parameter for the Mobile services. This is evident from the fact that since last one year, i.e. from quarter ending Dec 2012 to quarter ending Dec 2013, almost all the operators have met these parameters. The performance indicator for the same is as below:

Parameters	Benchmark	No. of Operators not Meeting the Benchmarks									
		Dec -12		Mar -13		June -13		Sept-13		Dec -13	
		Out Of 229 (Nos.)	Out Of 229 (in %)	Out Of 218 (Nos.)	Out Of 218 (in %)	Out Of 187 (Nos.)	Out of 187 (in %)	Out Of 183 (Nos.)	Out of 183 (in %)	Out Of 183 (Nos.)	Out of 183 (in %)
Connection Establishment (Accessibility)											
Call Set-up Success Rate (within licensee's own network)	≥ 95%	0	0	0	0	0	0	0	0	1	0.55%
SDCCH/ Paging Chl. Congestion	≤ 1%	0	0	0	0	0	0	0	0	1	0.55%
TCH Congestion	≤ 2%	1	0.44 %	1	0.46%	0	0	0	0	1	0.55%

Source: TRAI Performance Indicator report

- d) Thus, we request TRAI to kindly remove these QoS parameters from the reporting requirement of the Mobile service providers.



2) Methodology for reporting of % of cells with TCH drop>3% for QoS: There are two methods for calculating the Parameter of “worst cells i.e. TCH drop>3%”

- a) **First Method: As per the TRAI Regulations** “worst cells i.e., TCH drop>3%” should be reported based on their monthly performance, i.e. (i) Operators first calculate the total TCH Drops in each cell in a month and then identify the cells exceeding TCH drops for more than 3 %. Having identified, such cells, they calculate the % age of cells having more than 3% TCH drop as per the formula given in the Regulations 2009.
- b) **Second method: TRAI vide its letter dated 1st April 2014 have defined following method for reporting TCH drop:** (ii) Calculating the Number of Cells exceeding 3% TCH Drop on each day of the month and then averaging the same for the entire month. After calculating the average value of cells having TCH drops more than 3% for a month, the % age of such cells is calculated by the given formula in the Regulations 2009.
- c) We recommend the first method to be followed in calculating the performance in respect of the Parameter “worst cells, i.e. TCH drop>3%” because this is a monthly report. As the intention of the Operator & Regulator is to identify cells, which are consistently breaching the Drop Call Rate threshold. This method helps operators in identifying the consistently poor performing cells and work upon those, thereby improving the Network performance and customer experience. Also, this is a straight calculation and no averaging involved.
- d) Further, As per TRAI’s Regulations, Operators are declaring “worst BTS i.e. outage>24 hours” based on BTS’s monthly performance which is acceptable to TRAI. There should not be different methodology to measure two similar parameters such as “worst BTS” and “worst cells”. An illustration is attached for better understanding of both the methodologies.
- e) This second method requires ‘calculating the Drop Call Rate cell wise on a daily basis and then averaging it for the month’. We strongly believe this is not an appropriate method for calculation. In this method, there is an element of averaging involved and because of which if a cell breaches the benchmark only for a day or two, may get included in the monthly “% of cells with DCR>3%” list and gives a wrong picture of the Network.
- f) The first method helps us identify the consistently defaulting cells (and not those cells which may have temporarily defaulted). Thus, for internal improvement, using first method is a more appropriate report since we work towards correcting the consistently defaulting cells.
- g) **Our Request: We request TRAI to kindly prescribe the first method to be followed by operators for calculating the performance in respect of the Parameter “worst cells i.e. TCH drop>3%”.**
