

**CONSUMER PROTECTION ASSOCIATION  
HIMMATNAGAR  
DIST. : SABARKANTHA  
GUJARAT**



**Comments  
On**

**Draft Regulation on Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2023 (XX of 2023)**

Hon. Sir,

Namaskar.

We strongly agree with the Draft Regulation on “ Review of the Quality of Service ( Code of Practice for metering and Billing Accuracy ) Regulation 2023.

Accuracy of metering and billing of telecom services should be the prime focus to protect consumer interest.

The telecom network have under gone significantly changes, and many new services are offered have also under gone significant changes specially after introduction of unlimited data or voice plans with fixed tariff on daily/monthly/yearly bases. All these new tariff offerings provide unlimited usage with certain limits under Fair Usage Policy ( FUP ), there by shifting focus from

itemized billing to committed volume data or voice or SMS on daily basis or till the expiry of validity of the subscribed tariff offering.

New IP based network such as 4G- LTE/5G technologies carrying voice-over data have now shifted billing from per second/minute based billing to data volume based billing. So service providers must have advanced, Robust and Scalable IT products for accurate billing of various services being offered to consumers, especially since telecom networks have under gone major changes over the years.

We also in favor that all service providers should get their metering and billing system and respective LSAs audited for access services by an auditor once in every financial year which should be empanelled by TRAI to conduct such audit in a prescribed format.

Current system is somehow not working at its best and on various occasions, the outages at any particular district or area go unnoticed because the down time is averaged out in the whole LSA data. It is important to audit state and district wise QoS data. This will result in more granular data reporting as against the current practice of reporting at the LSA level and average on a Quality basis.

**Few Suggestions :**

1. Service Provider should obtain approval of their metering and billing systems from independent third-party assessors ( Approval by TRAI ) against a prescribed standard. This system of approval arrangements should represents the TRAI Metering and Billing Approval Scheme.

**Approval bodies :**

Approval bodies should approve and audit a communications provider's metering and billing systems and monitor compliance with the requirements of the TRAI Metering and Billing Direction.

**Becoming an approval body :**

To become an Approval Body, applicants must be accredited by the Indian Accreditation Service to ensure that they meet the international standard ISO17065: 2012 to carry out the Metering and Billing Approval Process as defined in the TRAI's Direction.

**2. Review of the Direction**

To reflect changes in the communications market and experience of operating the Direction, TRAI should review the Regulation after three years.

We strongly believes that the new regulation will also assist respective state/UT governments in assisting service providers in improving QoS in the state/UT as needed and recommend it.

Thanks.

Yours faithfully,

( Dr. Kashyapnath )  
President

Member Organization : TRAI