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Review of The Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006

ISSUES FOR CONSULTATION

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 specially in case of data packs, STVs, multiple tariff packs at a time, etc.? Please give your views with detailed justification.

Yes. There is a need for change in the sampling methodology to make the audit more relevant.

Our first suggestion in this regard is that the number of tariff plans that should be subject to the audit. It should be increased from 3 pre-paid plans and 2 post-paid plans having the maximum number of customers.

We outline 3 options in this regard in decreasing order of preference from the consumer perspective with our justifications for them.

1. All Post-paid and Pre-paid Plans. All plans that are existing at the beginning of the quarter of the audit should be included for audit.

The reasons for this are there can be errors and deficiencies in any of the plans and that customers using those plans would suffer. With the purpose of laying down the code of practice for metering and billing being the protection of the interest of consumers of telecommunication services (Regulation 3 of the code). The regulator is thereby mandated to protect consumers in all plans.

With the TSPs generally having around 12 to 15 plans, choosing the 2 popular plans will be discriminatory to large of consumers as a hypothetical example

may reveal. If the first 2 popular plans have 15 % and 10 % of the customers, totaling 25 % of the customer of a TSP, then 75 % of the customers are out of the audit.

In fact it the plans which not used by a large number of customers, are where the errors and deficiencies are not likely to identified quickly.

2. Percentage of Post-paid and Pre-paid Plans. Choose that many Plans that cover at least a percentage of total base of the customers. That is choose plans till the cumulative percentage reaches 75 % or 80 % of the TSPs total number of consumers.

This is a more efficient plan in terms of time and cost though not the ideal option as enumerated under option 1.

Another advantage of this option that there is NO need to mention the number of plans which could lead to disproportionate sampling when the number of plans is mentioned. For example in an quarter the top 2 plans may be covering 25 % of the total customers, and in the next quarter these 2 plans still remaining the top 2 in terms of the number of customers may now cover 20 % of the total customers.

The third reason is that there is NO need to have different number of plans for pre-paid and post-paid customers. The percentage fixed will automatically decide on the number of plans, dynamically reflecting the changing realities of the market.

3. Plans with a fixed percentage of customers. This is third option which we are proposing. Here plans which have a low number (% of customers of total customers of the TSP) would be dropped from the audit. That is plans which have only 5% or 10% of the total number of customers would NOT be subject to the audit. ALL plans above this threshold level will be included.

The justification for this is option

The audit would be faster and more cost effective.

There will be more customers covered that under option 2

In case of a long tail (large number of plans with low number/percentage of customers) this will be better than option 2.

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.

No comments to offer.

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.

The new technologies are unfortunately being used to lower the human resources cost to the companies rather than being leveraged for the convenience and benefit of the customers.

There is a contract between the TSP and the customer and hence there is a need for a written document that has all the relevant details of such a contract. This would also be helpful in settling grievances and disputes

Our suggestions are as follows,

1. The customer should be able to get all the information relevant to him, like Plan details, terms and conditions of the plans, VAS subscribed WHENEVER he needs them. Hence it is suggested that these details be provided as a SOFT copy in an easily readable and popular format like PDF through different mediums of website, App., etc. There should be no restrictions in the number of such requests by the customer.
2. Also whenever the customer or the TSP makes any changes in the Plan, the service opted, the terms and conditions, then the TSP should send a SOFT copy of the ENTIRE document with the changes HIGHLIGHTED IN BOLD or COLOR.
3. The current provision of providing a hard copy of the CAF and TEF can be retained at the time of enrollment of the customers if the customer request such a document as this entry stage is critical in relationship when the customer is not aware of the terms and conditions of the service.
4. With the TSP cutting down on personal interaction, even through the call centres, it is imperative that the other medias of voice assistants, chatbots and interactive videos, are used to answer the queries, provide clarifications and clear the doubts of the customers. ALL these media or channels should have a provision to access a live person

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.

No comments to offer.

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 36complaint handling would help in improving effectiveness of complaint redressal mechanism? Please give your views with detailed justification.

Billing complaints should be handled on priority and in an expeditious manner. However, with many modes of payments and involvement of third parties, there is delay in addressing the consumer complaints and resolving the issue, which ultimately is detrimental to the customer ALWAYS, with him losing money through interest or fines and many times disruption in the service. With many consumer using mobile banking and all banks insisting on mobile number for a variety of services, any disruption in service causes tremendous hardships and loss to the consumers. In light of these issues, we suggest the following changes.

- a) The types of billing complaints should be clearly defined and shared with the consumers. This will enable speedier redressal and monitoring. Further it will help in auditing billing complaints.
- b) There should be fixed time period to address and resolve the billing complaints, especially when the payments is done through the TSP channels like App, Retail Store, Distributors, TSPs' e-wallet,.
- c) When the billing complaints involves a third party like a Bank, Payment wallet etc, audit should be carried out more frequently to identify the root causes and these should be speedily rectified by the TSP.
- d) In case of notice being served on the customer for restriction and removal of a service by the TSP unilaterally, there is a need for an acknowledgement by the Customer that a push notification has been received by him and he has read it. This is necessary to ensure that the notice is not MISSED by the customer in the plethora of notifications received. Further in the event of a billing complaint, such a confirmation would serve to determine the actor responsible for triggering any dispute.

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

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and made available to the auditor in a timely manner for conducting the audit? Please give your views with detailed justification.

No comments to offer.

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. Pl support your views with rationale.

No comments to offer

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

No comments to offer

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