

ISSUES FOR CONSULTATION

WIRELESS & WIRELINE COMMON ISSUES

- 1. Do you suggest any change in existing provisions to ensure timely termination of service/closure? If so, please provide details.**

S Tel's Comments: The present provisions are arrived at after much deliberation. The Service provider needs time to redress the grievance in totality and hence for these activities 7 days is the minimum requirement, therefore we recommend that the existing provisions be persisted with.

- 2. Do you agree with the suggestions for seeking explicit consent of the customer, in writing or SMS or e-mail or FAX, to continue with the service, once a request has been made for termination of service?**

S Tel's Comments: We believe that once a customer has agreed to be remain on the same service provider whose consent would be available with the TSP in electronic form, therefore there is no need to seek explicit consent of the customer, in writing or SMS or e-mail or FAX.

- 3. Do you agree with the time period of four weeks provided for resolution of billing/charging complaints? If not, please suggest alternatives.**

S Tel's Comments: Yes

- 4. Do you agree with present provisions regarding period of one week for applying credit/waiver/adjustment to customer's account upon resolution of billing complaint?**

S Tel's Comments: The credit/waiver/adjustment to customer shall be displayed/ made available in the next billing cycle.

- 5. What should be the time period and terms and conditions for refund of deposits after closure/termination of service? &**

- 6. What steps do you suggest for timely refund of deposits after closure/ termination of service?**

S Tel's Comments: We believe that the currently provided time period of 60 days be reduced to 45 days but not less than 45 days.

METERING AND BILLING ISSUES

- 7. Do you propose any change in the existing system of selection of tariff plans for the audit of metering and billing system of service providers to make whole exercise more effective?**

S Tel's Comments: No change is required in the existing system of selection of tariff plans as well as in the entire scope of audit of billing and metering system.

- 8. What methods of alert do you prefer for premium service calls (Call rates higher than normal local call charges rates) before such calls are put through?**

S Tel's Comments: Current system is absolutely fine. Proactively the service providers should ensure that the call rates for premium service are displayed more prominently in the advertisements and websites.

- 9. What information in your view should be provided to prepaid subscribers immediately on completion of every call to facilitate him understand his usages and verify correctness of the deductions?**

S Tel's Comments: The service providers are already providing the following information to the prepaid subscribers immediately on completion of every call which is a sufficient information.

- > Amount deducted for the call
- > Balance left after the call
- > Validity period
- > Last call charges

- 10. What information do you feel is necessary after recharging a prepaid connection to ensure complete value for money immediately after recharging/top up?**

S Tel's Comments: Recharging is done only when the subscriber fully consents to it understanding the value for money and benefits attached to it, hence no need for separate information on recharges.

CONSUMER PROTECTION AND REDRESSAAL OF GRIEVANCES

**11. In your opinion, what should be done to increase the awareness about the call centre?**

S Tel's Comments:

Generally the customers are well aware of the redressal mechanism at Call Centre / nodal officer/appellate authority. TRAI's survey also indicates the same. In any case, the operators would continue their efforts with regard to providing the details through following means-

- Advertisements,
- Operator's Website
- TRAI's Website
- Embedded in SIM etc.

**12. How can we enhance accessibility of call centres for booking the complaints?**

**13. What are your suggestions about the location of the menu option for talking to a customer care agent/executive in the Interactive Voice Response (IVR) system of the Call Centre/ customer care number, for facilitating easy access to the call centre agent/executive? Should it be the first sub-menu at the third layer, the first layer being the choice of language and the second layer being service menu?**

S Tel's Comments: All service providers have invested significantly to set up sophisticated, state-of-the-art Interactive Voice Response (IVR) systems with consumer friendly, menu driven options that can easily cater to an entire gamut of queries/information requirements of the subscriber.

If the subscriber is not satisfied or he would like to register the complaint, there is always an option available to speak to customer care executives.

It may be appreciated that Consumer friendly IVR has been set up since; the use of call centre resources for "information related calls" diverts a large portion of the call centre resources away from addressing genuine consumer grievances.

Service Providers shall actively work towards training/ educating the call center executives so as to enable timely resolution of customer complaints.

So as to improve accessibility of call centers, operators continuously keep increasing the capacity (including manpower) on a periodic basis depending on the call volumes.

Moreover, recently most of the service providers have implemented 198 as the dedicated call centre number for complaints.

we would like to recommend that the location of the menu option for talking to a customer care agent/executive in the Interactive Voice Response (IVR) system of the Call Centre/ customer care number be the third layer (not specifically at the first sub-menu), the first layer being the choice of language and the second layer being service menu.

**14. Should TRAI mandate all service providers to provide complaint booking number accessible from other telecom networks also for complaint booking in case of service disruption? Should such call centre numbers also be toll free?**

S Tel's Comments: The accessibility of call centers for complaint booking from other telecom networks is easily available. However, this facility being toll free should not be mandated by TRAI and should be left to the market forces. Making the facility toll free would increase the chances of the same being misused by making the helpline prone to frivolous callers hindering service to genuine customers with grievances.

**15. Do you agree that docket numbers should also be sent to subscribers' through SMS who is booking complaint?**

S Tel's Comments: Docket numbers shall be sent to subscribers through SMS for booking a complaint. Moreover, current process of verbal communication can also co-exist. Sending the docket number through SMS will help the subscriber to pursue the complaint and will thus increase the effectiveness of the redressal system.

**16. Will sending of docket number of complaints to subscribers through SMS help them to pursue their complaints and increase effectiveness of consumer grievance redressal system?**

**17. Do you feel that unique format for docket numbers across the service providers will increase monitoring and speedy redressal of subscriber complaints?**

S Tel's Comments: There is no need to have a unique format or a common format across the industry and each service provider should be given the flexibility to have its own format.

**18. Do you agree that customers need to be informed about redressal of their complaints before closure of the docket? If so, will it be desirable to inform the subscriber about status of the complaints through SMS before closure of the docket number?**

S Tel's Comments: the service providers do inform the subscribers about the status of the complaints. The same is also acknowledged by the independent survey. In future also, service providers shall ensure that once a complaint is resolved, an appropriate communication is sent to the subscriber confirming the same. We believe that it is the closure of complaints within the prescribed time-frame which is more important, rather than giving a regular updates to the subscriber.

**19. What parameters should be considered to determine the effectiveness of complaint redressal at call centre level? How could effectiveness of complaint redressal at call centre level be measured?**

S Tel's Comments: Service providers impart regular training to the call center executives to ensure effective, efficient and faster resolution of complaints. The call centre officers have been trained on three tier grievance redressal system and they have been instructed to share nodal officer's details in case the subscriber is not satisfied.

**20. In your views, will it be feasible to indicate tentative time frame for redressal of consumer grievance? Will it increase subscriber satisfaction level?**

S Tel's Comments: The present timelines for redressal of grievances are absolutely fine.

**21. What are your suggestions for using complaints received at call centre for improvement in QoS and processes adopted by a service provider? Do you perceive any need for TRAI to oversee such analysis and monitor corrective actions?**

S Tel's Comments: Indian telecom is working in the highly competitive multi operator scenario and each operator is fairly aware about providing best services at call centre management for consumer satisfaction. We do not see TRAI's intervention on this at this stage.

**22. In your opinion, what should be done to create awareness about the Nodal Officer?**

S Tel's Comments: Apart from the list of Nodal officers provided on the TRAI's and Service Provider's website, the TRAI can educate telecom consumers through its various consumer seminars on the grievance settlement mechanism.

**23. What should be the maximum permissible time in which nodal officer must acknowledge the receipt of the grievance and indicate a unique number for future reference?**

S Tel's Comments: The currently allowed time of 3 days should be the maximum time.

**24. Do you suggest that the nodal officer give an indicative time for redressal of grievance while communicating receipt of grievance? Will it boost the confidence of the subscriber?**

**25. Will it be feasible to communicate the tentative time for redressal of the grievances and ensure redressal within prescribed timeframe?**

**26. What framework do you propose for timely disposal of consumer grievances and feedback on status of grievance redressal before disposal? (Reference Para 3.82)**

S Tel's Comments: Adapting to the current time lines specified by TRAI and consumer education by TRAI in its various seminars alone are sufficient measures to boost the subscribers confidence. There appears no need to further complicate the grievance redressal mechanism which may result in confusing subscribers.

**27. In your opinion, what should be done to improve the accessibility of nodal officers?**

S Tel's Comments: The present mechanism for approaching Nodal Officer is working absolutely fine and no need to regulate this further.

**28. How would effectiveness of Nodal Officer be monitored?**

**29. What should be the parameters and framework to judge the effectiveness of the nodal officers?**

S Tel's Comments: At present a Quarterly Report on no. of complaints booked and redressed thereof at all 3 levels of 3-tier mechanism is provided which is an appropriate mechanism for judging effectiveness of redressal officers at all 3 levels.

**30. In your opinion, what should be the time frame for redressal of grievances by the Nodal Officer?**

S Tel's Comments: Currently specified time frame of redressing grievances relating to disruption of service within three days and other cases within ten days is absolutely fine and working well.

**31. What should be done to ensure redressal of consumer grievances within prescribed timeframe?**

**32. What framework do you perceive for regular analysis of consumer grievances at Nodal officer level to identify systemic failures and to initiate necessary actions? Do you perceive the need to mandate such provisions?**

S Tel's Comments: We believe that current regulations are exhaustive to deal with these issues.

**33. What are your views regarding charging of nodal officer Number especially in view of the fact that nodal officer is part of consumer grievance redressal mechanism? Elaborate your response.**

S Tel's Comments: We believe that the nodal officer no. should not be toll free because of the following reasons:

1. If nodal officers telephone will also be toll free, there will be a tendency to directly reach to nodal officer rather than approaching to the call centre. In that case, the Nodal officer may become an alternative Call Centre and this may defeat the very purpose of having a higher level for grievance redressal at Nodal Officer level.
2. Further, there are already other avenues available which are toll free.
3. Moreover, in current scenario, the local charges levied are very minimal.

**34. What should be done to enhance awareness about Appellate Authority to ensure effective redressal of consumer grievances?**

**35. What framework to you suggest for filing of the appeal to Appellate Authority for redressal of consumer grievances by subscribers? How can it be made easy and user friendly? (Reference Para 3.99)**

**36. In your view, what should be the time frame for acknowledgement of the appeal by Appellate Authority?**

**37. Would it be feasible and desirable to convey the tentative time for disposal of the appeal by Appellate Authority to improve subscriber confidence?**

**38. How feedback at the time of disposal of appeal can be made more transparent, self speaking and impartial? Is there a need to institutionalize feedback mechanism at appellate authority level of service provider to improve effectiveness of the processes?**

**39. What should be the framework to improve the effectiveness and acceptability of the Appellate authority as an independent and impartial body? Provide details of the proposed framework.**

**40. In your opinion, what should be the maximum time period for deciding an appeal by the Appellate Authority?**

S Tel's Comments: we are of the view that a change in the existing system at the Appellate Authority level may not be necessary.

**41. What should be the time limit within which the information about itemized usage charges should be provided on request from a pre-paid customer?**

S Tel's Comments: It is pertinent to mention here that billing system for pre-paid and post-paid works differently. Further, in pre-paid, the operators have different systems for (say) caller tunes, SMS, and other VAS services. Therefore, it takes some time to collate the data. For providing the itemized usage data for the last 30 days to the pre-paid subscriber, the time limit within which the information should be provided should not be more than 15 days.

**42. Can you suggest further measures to effectively control provision of value added services without explicit consent of the subscriber? Kindly provide details of proposed framework.**

S Tel's Comments: TRAI has come up with several directions in association with the industry to safeguard the interest of the subscribers. For example, more recently, after detailed discussions with the industry, the Authority has laid down the process, wherein all OBD subscriptions have double confirmation prompts.

A short code 15523 has also been allotted as VAS helpline for registering subscriber's request for unsubscribing to any VAS service.

**43. In your opinion, what more should be done to increase effectiveness of consumer education?**

S Tel's Comments: The feedback received from the subscribers during the workshops will be captured and analyzed for understanding the behavior of complaints which will help to serve them better. It is proposed that further awareness may be raised by utilizing the funds from the TRAI Consumers Education and Protection Fund.

**44. How effectiveness of web based Consumer grievance redressal mechanism can be increased?**

S Tel's Comments: TRAI is already in the process of implementing such a system.