

September 1, 2010

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Subject: Comments on TRAI Consultation Paper on Review of Measures to protect interest of consumers in the telecom sector (TRAI No. CP 10/2010 date 2nd August 2010)

Dear Sir,

We take this opportunity to sincerely thank TRAI for bringing out the consultation paper on the above referred subject which is most current and essential in view of exponential growth in the telecom sector. TRAI has taken due care to cover all services viz. basic services, cellular mobile services, broadband services etc.

All necessary elements of service concerning its provision, repair and restoration, resolution of various problems including billing & QOS, procedure for termination of services and benchmark for refund of money to the consumers, if due, have been addressed in detail. In addition, illustrative examples and practices prevailing in various countries have been covered in depth. This gives an excellent idea for improving benchmarks for the existing services in improving our work practices as well as response to consumers.

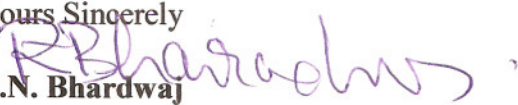
The following are the important comments which shall also be considered in addition to the 'Summary of Issues for Consultation' covered in Chapter V:

1. Call Centres: As per TRAI directions, each operator is having a call centre for having first interaction with the consumers for information as well as Redressal of complaints. These call centres are highly ill equipped in terms of information, possible time frames for Redressal of complaints as well as leading to nodal officer for all functions including provisioning, restoration, billing etc.
2. IVRS: It is to be mentioned that IVRS systems are very poorly designed in terms of capability for handling large base of consumers consistent with growth. This takes a lot of consumer time which leads to loss of patience of the consumers. This makes consumers irritant. This requires improvement in terms of augmentation of capacity of the IVRS systems for the fast response to the consumers. The parameters for this aspect may be best specified by TRAI.
3. For Redressal of grievances, three tier system covering call centres, nodal officers and Appellate authority has been mandated by TRAI. However, it is mentioned that this Redressal system is utter failure as consumers do not get any meaningful

information & response from the call centres, availability of nodal officers is very rare and generally very few consumers are lucky to reach the Appellate authority for Redressal of grievances.

4. In order to improve the efficiency of the Grievance Redressal system as mentioned in para 3 above, the following are suggested:
 - i) The information about nodal officers, appellate authorities shall be published periodically on monthly or quarterly basis with full details viz. name, telephone nos, postal address, email address etc.
 - ii) The service providers shall specify the information available at the call centres and this should also be published periodically.
 - iii) The call centre employees and the supervisors shall be trained and given orientation consistent with the new services.
5. In order to further improve the Grievances Redressal systems, the setting up of Telecom Adalat for each licensed service area shall be made mandatory for all service providers. These Adalats shall be convened at regular interval of six months at the level of CTO/CEO of each service area.
6. Most of the service providers are offering a large no. of Pre-paid plans which are not easily understood by most of the common consumers. The following is suggested in this regard:
 - i) The number of plans shall be restricted and made simple to be easily understood by all consumers.
 - ii) A comparative chart for these plans shall be displayed by all service providers at their outlets / franchises.
 - iii) Full details of money paid for recharge as well as for actual use of service shall be provided to the consumers.
7. Since most of the consumers do not have internet access, it is suggested that all information shall be available in printed form at service provider outlets / franchises as well as published in the newspapers.

Yours Sincerely


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