

Comments on -Consultation Paper on Review of The Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006.

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.

ANS- Revenue assurance and fraud management systems are widely in use by telecom service providers to check revenue leakage and detect host of other anomalies in the billing and charging systems of post-paid and pre-paid

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.

ANS- Many billing complaints emanate from improper or inadequate provision of information or provision of misleading information relating to tariff both at the time of provisioning of service or while offering new tariff plan or vouchers to an existing customer.

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 of information in timely and appropriate manner? Please give your views with detailed justification.

ANS- Another provision in the regulations is that whenever a customer dials a specific number to get instant value added service, e.g., download of content, such as a film clip or ring tone or entry to an interactive service (such as a game), the charge for the service must be provided to him/her before he/she commits to use the service

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.

ANS- To maintain the accuracy of measurement, CoP prescribes the standards for accuracy of the metering and billing system, and all charges levied for telecommunication services on the customer should be consistent with the tariff applicable to the customer.

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

ANS-During the initial years of audit, the common problems observed by the auditors were delay in configuration of new codes, wrong configuration of new codes, configuration of local codes as long-distance codes and vice versa, wrong configuration of tariff plans in the system, wrong charging due to incorrect dialing, etc. Issues relating to the configuration of codes and issues relating to wrong dialing are no longer observed by the auditors.

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

ANS-For timeliness of post-pay billing, CoP subjects to systematic processes, it requires that in case an item is not charged consecutively in four-monthly bills by the TSP, then it cannot be charged in a later bill and would be written off, unless, any extension of time is granted by TRAI. TSPs have to make appropriate arrangements to ensure that an effectual bill or bill data file delivery schedule is in place

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.

ANS-For conducting audits of a period which is not of past few quarters, requires access to details, which might have been archived and not available as fast as in normal audit process. It is observed that auditors face lot of difficulties seeking CDRs of an old period required for the audit purposes. TSPs argue that retrieval of old records is cumbersome and resource-intensive exercise as records are not archived to get records of selective numbers.

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

ANS-Audit of old records from Business Intelligence tools, and not having adequate information required to carry-out audit also makes it difficult to verify billing/charging if audit trail is not available. For example, if bill's PDF does not contain the summary usage and free quota offered to the customer, and the required additional details are of a very old period then the TSPs might say that the records were purged