



VIL/LT/14-15/084
12th June 2014

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg, Old Minto Road
New Delhi-110002

Kind Attention : Shri A. Robert J Ravi, Advisor (QoS & CA)
Subject : Consultation Paper on Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services

Dear Sir,

This is with reference to the Consultation Paper issued by TRAI on 21st May 2014.

We are pleased to submit our comments and views on the consultation on Review of the Standards of Quality of Service of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services.

We hope that our submissions will merit your kind consideration.

Thanking you

Yours faithfully,
For **Vodafone India Limited**

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Vodafone's Response on Consultation Paper on " Review of the Standards of the Quality of Service of Basic Telephone Services (Wireline)"

Vodafone welcomes the authority's initiative to review the benchmarks for some of the Quality of service parameters for wireline and wireless services.

In this regard, we would first like to submit that in a scenario of intense competition in the Indian telecom market, the operators themselves are under severe pressure to maintain their QoS, both in order to attract new customers as well as retain their existing customers. Hence, Quality of Service (QoS) is driven by market forces rather than by regulatory intervention.

Thus, we respectfully submit that the Authority should progressively move towards light touch Regulation with regard to QoS and in a phased manner, reduce the number of QoS parameters being reported by Mobile and Fixedline operators.

We are gratified to note that a beginning has already been made in this regard by the Authority by seeking to remove the parameters of Call Completion Rate within a local network and Answer to Seizure Ratio (ASR) for basic services on the grounds that as most of the operators are meeting these parameters, they need not be reported to the Authority.

In this regard, we would also like to suggest that the same principle also ought to be extended to the parameters of Call Set-up Success Rate (within licensee's own network) SDCCH/ Paging Chl. Congestion, TCH Congestion and POI Congestion for cellular mobile services, as in the case of these parameters as well, virtually all operators are consistently meeting these parameter benchmarks.

Against the above, our response on the various issues raised in the consultation paper is provided below:

A. Benchmarks related to Basic Services

Q1: In your view, does the benchmark for the parameter "Fault incidences (No. of faults/100 subscribers/ month)" for Basic Telephone Service need revision? If so, what should be the benchmark? Please give your comments with justification.

Q2: In your view, does the benchmark for parameter "Fault Repair by next working day" for Basic Telephone Service need revision? If so, what should be the benchmark for faults repaired by next working day and by 3, 5 or 7 days? Please give your comments with justification.

Q3: What are your views on relaxing the benchmark for parameter "Mean Time to Repair (MTTR) to \leq 12 Hrs" for Basic Telephone Service? Please give your comments with justification.

Vodafone Response:

We have noted that the Authority in the consultation paper, has recognised the various practical difficulties that are beyond the control of the service providers and that can constrain service providers in achieving the above benchmarks.

In view of the above, we support a revision in these parameters as below :

- 1. "Fault incidences (No. of faults/100 subscribers/ month)" - the benchmark may be relaxed and modified to \leq 10%.**



2. Fault Repaired by Next working day and 3rd, 5th or 7th Day:

- 1) **For urban areas:**
 - a) By next working day: $\geq 70\%$;
 - b) Within 3 days: 80%;
 - c) Within 5 days: 98%;

- 2) **For rural and hilly areas:**
 - a) By next working day: $\geq 70\%$;
 - b) Within 3 days: 80%;
 - c) Within 5 days: 90%;
 - d) Within 7 days: 98%.

It may kindly also be clarified that number of days mean full working days.

3. "Mean Time to Repair (MTTR)" – the benchmark may be relaxed to ≤ 12 hrs.

Q4: What are your views on removing the parameters for Basic Telephone Service (a) Call Completion Rate within a local network or, (b) Answer to Seizure Ratio (ASR) from reporting of compliance to TRAI? Please give your comments with justification.

Vodafone Response :

We agree with the Authority's view, that since most of the operators are meeting the benchmarks prescribed for CCR and ASR, performance against these, may not be reported to TRAI and may be left to Service Providers to monitor.

In this regard, we would also like to suggest that the same principle also ought to be extended to the parameters of Call Set-up Success Rate (within licensee's own network) SDCCCH/ Paging Chl. Congestion and TCH Congestion for cellular mobile services, as in the case of these parameters as well as in the case of these parameters too, we would like to highlight that since last one year, i.e. from quarter ending Dec 2012 to quarter ending Dec 2013, virtually all the service providers have been meeting the benchmarks against these parameters. The performance indicators for the same is as below:

Parameters	Benchmark	No. of Operators not Meeting the Benchmarks									
		Dec -12		Mar -13		June -13		Sept-13		Dec -13	
		Out Of 229 (No s.)	Out Of 229 (in %)	Out Of 218 (No s.)	Out Of 218 (in %)	Out Of 187 (Nos .)	Out of 187 (in %)	Out Of 183 (Nos.)	Out of 183 (in %)	Out Of 183 (Nos.)	Out of 183 (in %)
Connection Establishment (Accessibility)											
Call Set-up Success Rate (within licensee's own network)	$\geq 95\%$	0	0	0	0	0	0	0	0	1	0.55%
SDCCCH/ Paging Chl. Congestion	$\leq 1\%$	0	0	0	0	0	0	0	0	1	0.55%
TCH Congestion	$\leq 2\%$	1	0.44 %	1	0.46 %	0	0	0	0	1	0.55%



Similarly, in the case of the POI congestion parameter, the Authority itself has noted in its Point of Interconnection (POIs) Congestion report of the Cellular Mobile Telephone Service Providers (CMTS) and Basic Telephone Service (Wireline) Providers for the months of January, February & March, 2014 dated 23th May, 2014 that this parameter is under control. (refer attached Annexure)

In view of the above, we would like to respectfully submit that the Authority may kindly also consider removing the QoS benchmarks for the Connection Establishment (Accessibility) and POI Congestion parameter for the Mobile services and that performance against these may not be reported to the Authority, but may be left to Service Providers to monitor.

B. Benchmarks Related to both Basic & Cellular services

Q5: In your view, does the benchmark for parameter "Resolution of billing/charging complaints" for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification.

Vodafone Response:

Yes, we believe that the existing benchmark needs to be revised.

There are various factors which affects the TAT (turnaround time) for resolution of billing/charging related issues such as validation of billing /charging queries, extracting bill details, analysis of complaints with bill details, etc.

Hence, we request that the existing benchmark of 100% within 4 weeks may kindly be relaxed to **98% within 4 weeks.**

Q6: In your view, does the benchmark for parameter "Period of applying credit/ waiver/ adjustment to customer's account from the date of resolution of complaints" for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Please give your comments with justification

Vodafone Response :

Yes, we believe that the existing benchmark needs to be revised.

We submit that the internal process of applying credit/ waiver/ adjustment to customer's account requires time to validate/Approve and adjust the payments against the complaints raised by the customer.

Therefore, it may not be possible to apply a credit/ waiver adjustment to customer's account in 100% of the cases within one week of resolution of complaint.

Hence, we request that this parameter may kindly be relaxed to **95% within 7 working days** of resolution.

Q7: In your view, does the benchmark for parameter "Percentage of calls answered by the operators (voice to voice) within 60 seconds" for Basic Telephone Service and Cellular Mobile Telephone Service need revision? If so, what shall be the benchmark? Can the 'Percentage of calls answered by the operators (voice to voice)' be made within 90 seconds instead of 60 seconds? Please give your comments with justification.



Vodafone Response:

Yes, we strongly submit that this parameter needs to be urgently revised.

It is submitted that all operators have invested heavily in providing state-of-the-art customer care facilities so as to provide enhanced customer care experience to their respective subscribers. However, over the years, the number of subscribers has increased manifold thereby exponentially increasing the load on the call centers.

Manning of the Call centres being a human-centric activity, requires significant time for hiring and training, hence there is some amount of time lag involved ramping up the call centre resources to cater to the increased traffic loads. For eg. each of our call centre agents has to undergo a month long training before he/she can operate at the call centre desk.

We also note that in the case of broadband services, the benchmark is :

- a. $\geq 60\%$ within 60 seconds and
- b. $\geq 80\%$ within 90 Seconds

In view of the above, we request that, for both basic and mobile services, this benchmark may be relaxed to "Percentage of calls answered by the operators (voice to voice):

- a. within 60 seconds" $\geq 60\%$ and
- b. within 90 Seconds $\geq 80\%$

in line with the benchmarks prescribed under broadband services.

Q8: Shall the benchmark for parameter "Termination/ closure of service" for Basic Telephone Service and Cellular Mobile Telephone Service be revised? If so, what shall be the revised benchmark? Please give your comments with justification.

Vodafone Response:

Yes, we believe that the existing benchmark needs to be revised.

We submit that the Termination/ closure of service for Basic and Mobile subscribers may not be possible within 7 days in all cases, due to various reasons such as :

1. System related issues - Delay/ Error in processing of disconnection batch.
2. Retention Activity - Before disconnections our customer care executives try to reach the customer to understand the reason for disconnection. However, this activity is time consuming as at times the customer is not available.
3. Festive season/ extended weekends - In such a scenario the service providers hardly get any time to connect with the customers for retention and thus disconnection within the time prescribed .

In view of the above, we therefore request that this parameter be relaxed to **90% within 7 working days.**



Additional Comments:

1. Metering and Billing Credibility Benchmark (Postpaid & Prepaid)

With reference to Metering and Billing Parameter, we would like to highlight that we are continuously trying to improve and upgrade our systems in order to provide better customer experience and to improve the accuracy of our billing systems.

However, it often happens that at the time of such upgradation or improvement, as the billing system transformation is a major activity, there may be some difficulties in meeting the specified benchmark, due to possible system configuration issues and other unforeseen challenges.

While we try and take all possible precautions to pre-empt such occurrences by carrying out strict UAT & also ongoing system checks & reconciliations, there are still chances of some unforeseen errors.

Further, there are also some instance where, error occur at a systemic/platform level, which affect a large number of customers.

We always ensure the issue isolated and the error is rectified at the earliest for the entire affected base not just the customers who had raised complaints.

In view of the above, we most earnestly request that the Authority may kindly consider revising the Metering and Billing Credibility benchmark to 1%. In the alternative, we request that the Authority may kindly treat such transformation / systemic errors as exceptions and condone the same in view of the exigencies involved.

New Delhi
12 June 2014

**File No. 304-1/2014-QoS
TELECOM REGULATORY AUTHORITY OF INDIA
(Quality of Service Division)**

Dated: 23th May, 2014

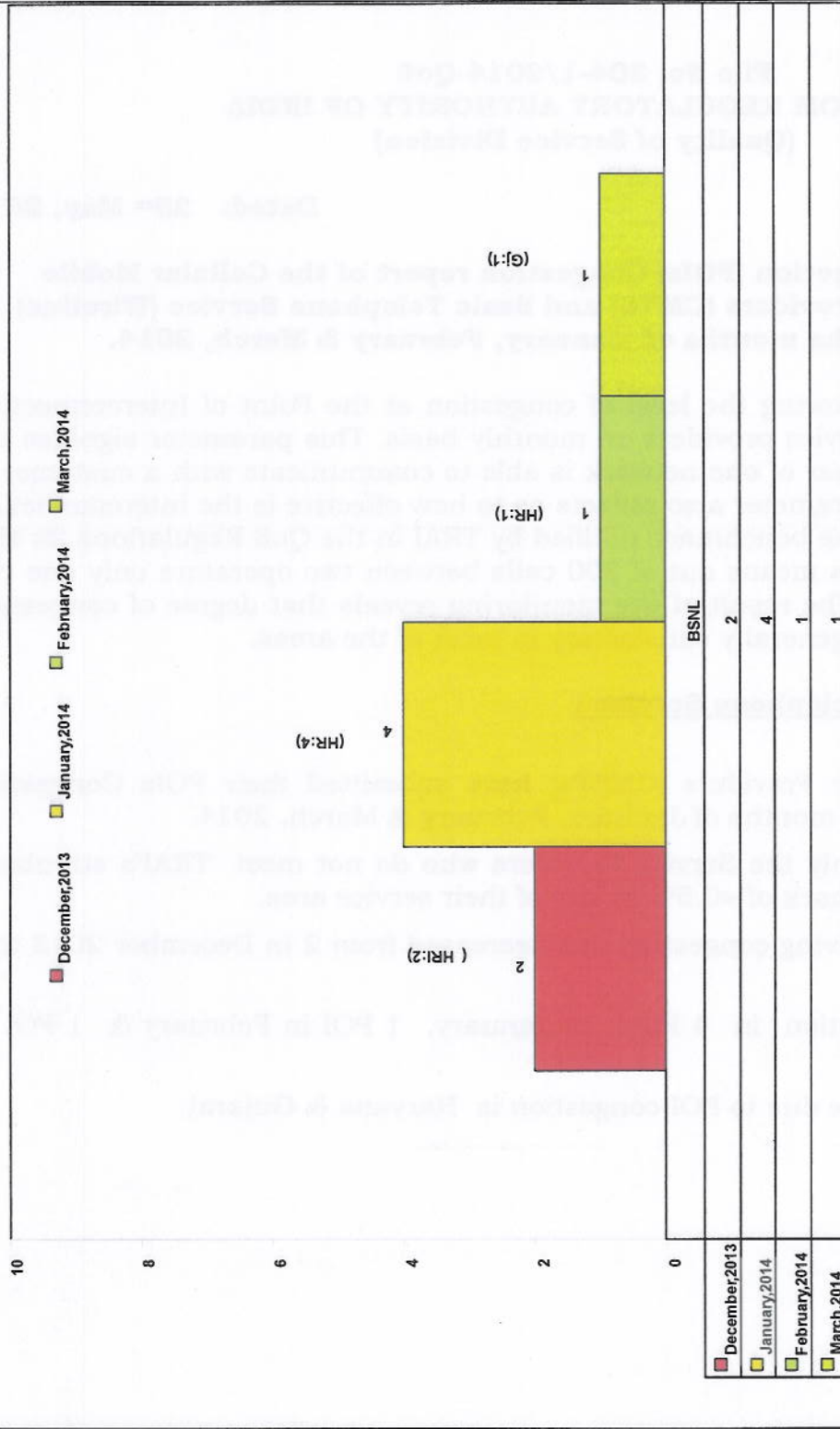
Point of Interconnection (POIs) Congestion report of the Cellular Mobile Telephone Service Providers (CMTS) and Basic Telephone Service (Wireline) Providers for the months of January, February & March, 2014.

TRAI has been monitoring the level of congestion at the Point of Interconnection (POI) between various service providers on monthly basis. This parameter signifies the ease with which a customer of one network is able to communicate with a customer of another network. This parameter also reflects as to how effective is the interconnection between two networks. The benchmark notified by TRAI in the QoS Regulations for this parameter is <0.5%. This means out of 200 calls between two operators only one call should face congestion. The result of the monitoring reveals that degree of congestion between the operators is generally satisfactory in most of the areas.

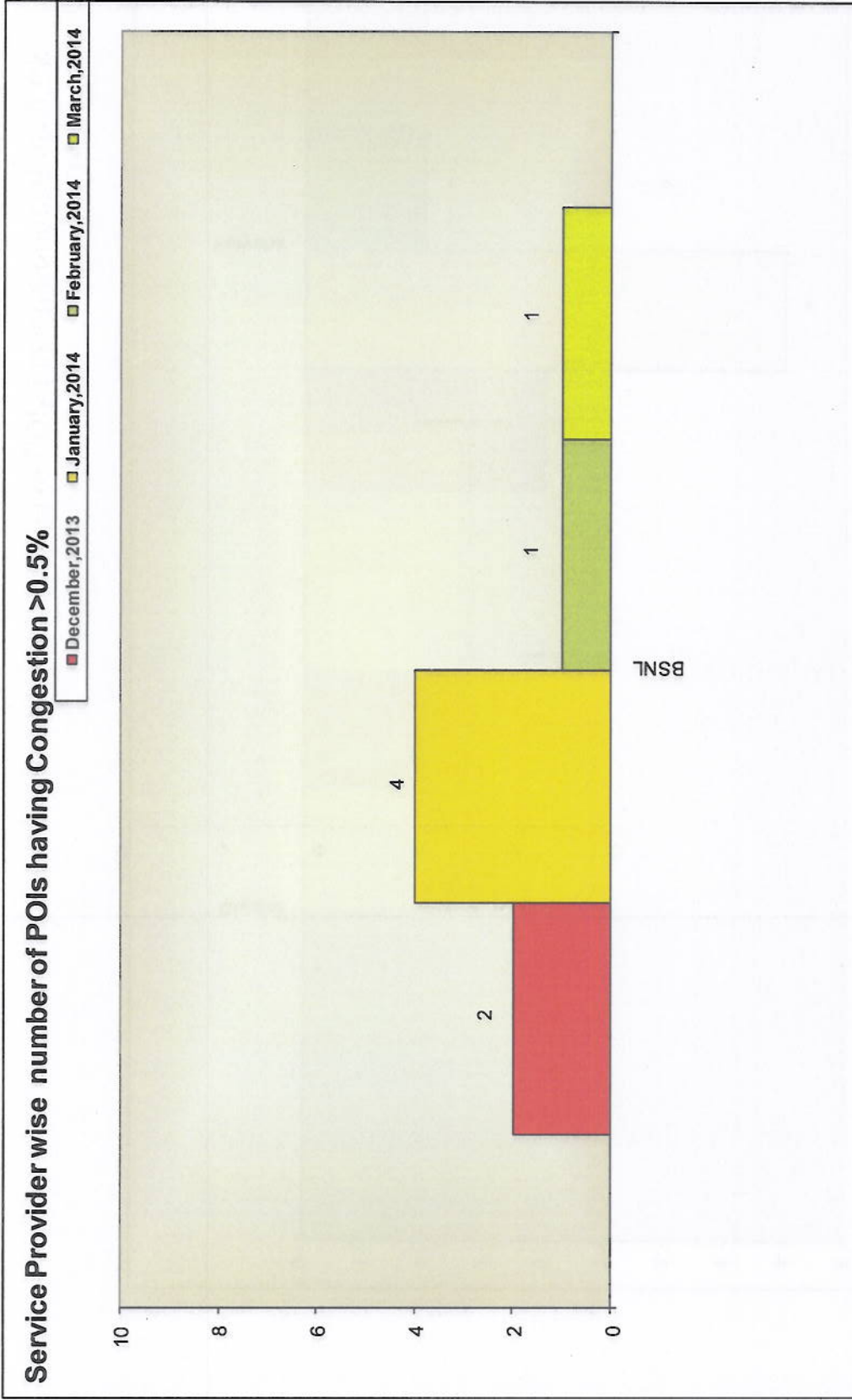
A. Cellular Mobile Telephone Service :

- Cellular Mobile Service Providers (CMSPs) have submitted their POIs Congestion Reports to TRAI for the months of January, February & March, 2014.
- This report includes only the Service Providers who do not meet TRAI's stipulated POI Congestion benchmark of <0.5% in any of their service area.
- The number of POIs having congestion has decreased from 2 in December 2013 to 1 POI in March, 2014.
- M/s BSNL has congestion in 4 POIs in January, 1 POI in February & 1 POI in March, 2014.
- The affected circle/state due to POI congestion is Haryana & Gujarat.

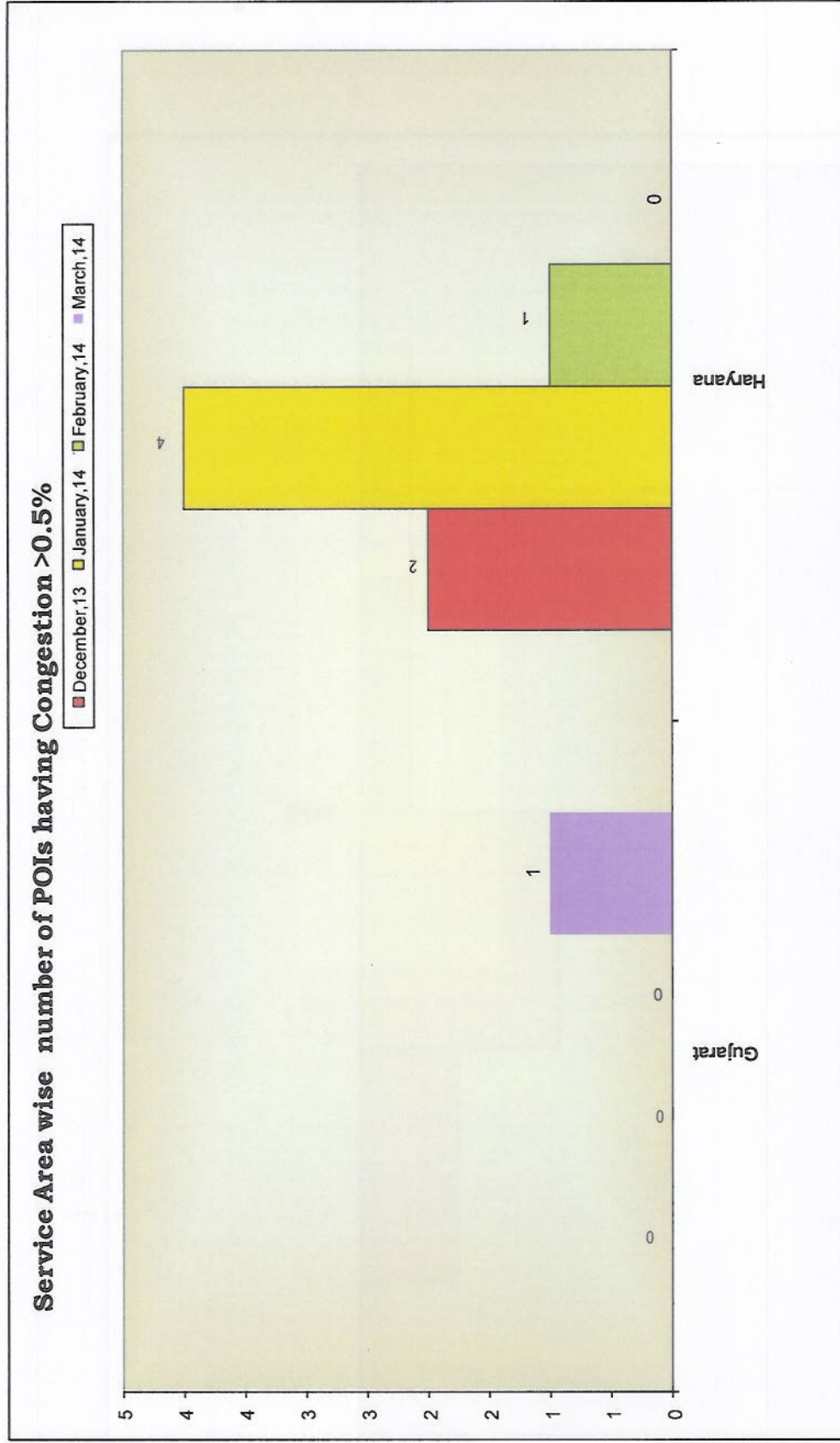
Service Provider wise & Service Area wise number of POIs having Congestion level >0.5%



(ii) Service Provider wise POI Congestion (CMTS)



(iii) Service Area wise POI Congestion (CMTS)



Basic Telephone Service (Wireline) :

As per the Regulations, 2009, Basic Telephone Service (Wireline) Providers have submitted their POIs Congestion Reports to TRAI for the months of January, February and March 2014.

- This report includes only the Service Providers who do not meet the TRAI's stipulated POI Congestion benchmark of <0.5% in any of their service area.
- No POI Congestion in the month of January, February and March,2014.

The non-provisioning and insufficient provisioning of telecom circuit resource as per traffic requirements leads to:

- inter-network congestion at the Point of Interconnection (POI)
- loss of calls
- repeated call attempts by consumers
- deterioration in Quality of Service (QoS)
- consumer dissatisfaction

Contact Address in case any clarification required:

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Authorised for issue

Advisor (CA & QoS)

Analysis -Service provider wise (CMTS) No. of POI having congestion level 0.5%and > 25%

SL. No.	Circles	December,2013		January,2014		February,2014		March,2014	
		>0.5%	>25%	>0.5%	>25%	>0.5%	>25%	>0.5%	>25%
1	BSNL	2	0	4	0	1	0	1	0
Total		2	0	4	0	1	0	1	0

Analysis - Service Provider wise (CM TS) No. of POI having congestion level 0.5% and >25%								
Operators	December, 2013		January, 2014		February, 2014		March, 2014	
	>0.5%	>25%	>0.5%	>25%	>0.5%	>25%	>0.5%	>25%
Aircel Ltd.	0	0	0	0	0	0	0	0
Bharti Airtel	0	0	0	0	0	0	0	0
BSNL	2	0	4	0	1	0	1	0
Idea	0	0	0	0	0	0	0	0
Loop Mobile	0	0	0	0	0	0	0	0
MTNL	0	0	0	0	0	0	0	0
Quadrant Televentures	0	0	0	0	0	0	0	0
RCOM	0	0	0	0	0	0	0	0
RTL	0	0	0	0	0	0	0	0
Sistema	0	0	0	0	0	0	0	0
Tata Teleservices	0	0	0	0	0	0	0	0
Uninor	0	0	0	0	0	0	0	0
Videocon	0	0	0	0	0	0	0	0
Vodafone	0	0	0	0	0	0	0	0
Total	2	0	4	0	1	0	1	0

Analysis - Service Area wise (CMTS) No. of POIs having congestion level > 0.5% and >25%									
SL. No.	Circles	December,2013		January,2014		February,2014		March,2014	
		>0.5%	>25%	>0.5%	>25%	>0.5%	>25%	>0.5%	>25%
1	Gujarat	0	0	0	0	0	0	1	0
2	Haryana	2	0	4	0	1	0	0	0
	Total	2	0	4	0	1	0	1	0

