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Sub: AUSPI Response to TRAI Consultation Paper No2/2005 dated 22nd Feb. 2005 on Review of Quality of Service (QoS) Parameters of Basic and Cellular Mobile Telephone Services

Dear Sir,

We refer to the TRAI Consultation Paper on Review of Quality of Service (QoS) Parameters of Basic and Cellular Mobile Telephone Services.

AUSPI is pleased to provide its response on the various issues raised in this Consultation Paper by TRAI. These are detailed out in our response which is enclosed herewith for your kind perusal.

We look forward to participation in the Open House Sessions and TRAI's favorable consideration of our views while finalizing its recommendations on the above consultation paper.

Should you require any further information or clarification, we shall be pleased to furnish the same.

Thanking you,

Yours faithfully,

S C Khanna
Secretary General

CC: Dr D P S Seth, Member, TRAI
Shri P K Sarma, Member, TRAI
Prof. Sanjay Govind Dhande, Member (Part-time), TRAI
Dr Arvind Virmani, Member (Part-time), TRAI
Dr Harsha Vardhana Singh, Secretary-cum-Principal Advisor, TRAI
Shri Sudhir Gupta, Advisor (QoS), TRAI
Shri R K Bhatnagar, Advisor (FN), TRAI
Shri M Kannan, Advisor (Eco), TRAI
Shri Rajendra Singh, Advisor (MN), TRAI

**AUSPI'S RESPONSE TO TRAI CONSULTATION PAPER NO. 2/2005 ON
REVIEW OF QUALITY OF SERVICE (QOS) PARAMETERS OF BASIC AND
CELLULAR MOBILE TELEPHONE SERVICES**

Chapter 2

Discussions on review of QOS parameters and their benchmarks

- Q 1. What are your comments on the existing parameters with benchmarks? Is there any need to change the existing parameters with benchmarks as suggested by the service providers and if so, your suggestion on the benchmark?**

There should be separate reporting requirement for wire line and wireless services. Under Basic Fixed Line services, wire line service and fixed wireless service should be reported separately and also evaluated separately. Parameters for wireless services like FWT and Limited Mobility should not be combined with Fixed Wire line Services for evaluation in performance indicator publication of TRAI etc.

During the long term period of 4 years already over, the private service providers took earnest efforts to improve the benchmarks and they have been successful in achieving the set QOS benchmarks in most of the parameters.

I. BASIC SERVICE (FIXED LINE)

Our response on existing parameters is as follows.

(A) OBJECTIVE PARAMETERS

Existing Parameters

- 1. Provision of a telephone after registration of demand (100% in <7 days)**

Non-achieving 100% benchmark of this parameter by the service providers is due to improper address / non-availability of the applicants in the address given and technically non-feasible areas where the connection has been sought and also due to verification process in line with current direction of the licensor.

In view of above reasons, we suggest modifying this bench mark as follows:

“Provision of a telephone after registration of demand (90% within 7 days), subject to technical feasibility in ready for service declared Areas/ Buildings subject to verification of address of customer’s premises in line with current order of the licensor”.

2. Fault incidence (No. of faults/100 subs./month) (<3)

We propose this benchmark as follows:

“Fault incidence (No. of faults/100 subs./month in respect of service affecting faults <3)”.

3. Fault Repair by next working day (>90%)

TRAI may consider amending of this parameter as follows:

“Repair of faults by next working day of receipt of complaint wherever technically feasible in respect of service affecting faults(>90%)”.

4. Mean Time To Repair (< 8 hours)

This parameter is generally relevant to a large system like Exchange switch, Transmission systems etc and is not required to be prescribed for local telephone connection.

TRAI may consider **deleting this parameter**.

5. Dial Tone Delay

Dial Tone Delay is a measure of the time it takes a network switching system to return dial tone to an originating subscriber on an analog access line after that subscriber goes off-hook. The receipt of the dial tone indicates the network switching system is ready to receive the subscriber’s address signaling.

This parameter was, in general, prescribed for network switching systems with electro-mechanical switches. In the present scenario, all the switching systems are of state of the art digital technology and the parameter is not required to be measured.

TRAI may consider **deleting this parameter**.

6. Call completion rate within a local network (> 65%)

Call completion rate which is defined as the ratio of successfully completed calls to the total number of attempted calls depends on a number of factors such as called line busy, no answer from called party, congestion in the network during busy hour as well as subscriber behaviour like premature release, wrong dialing etc.

We feel the parameter will not give a satisfactory assessment of network performance. In countries like Australia, Malaysia and Singapore cited by TRAI, this parameter is not included in QOS standards.

We suggest modifying this parameter as follows:

“Call completion rate within service provider’s own local network (>60%)”.

7. Metering and billing credibility (Not more than 0.1% of bills issued should be disputed over a billing cycle)

TRAI may consider to change this bench mark to $\leq 1\%$, as the norms are very stringent and many billing complaints are related to customer’s misinformation about his own bills. In view of this, the benchmark should be:

“Metering and billing credibility (Not more than 1% of bills issued should be disputed over a billing cycle)”.

8. Operator Assisted Trunk Calls

As this parameter has little relevance now, TRAI may consider **deleting this parameter.**

9. Response Time to other operator assisted services (95% calls <10 sec)

TRAI may consider **deleting this parameter**, as IVR systems have replaced the services now a days.

10. Customer Care (Promptness in attending to customers requests) (95%)

Shifts (< 3 days)
Closures (< 24 hours)
Additional facility (<24 hours)

Shifting: Shifting involves the same efforts as required for provision of a new connection. In view of that, same time i.e. 7 days which is equal to the benchmark for provision of telephone be given for shifting within the city.

All of the above, subject to verification of address of customer's new premises in line with current order of the licensor.

We suggest that the benchmark for shift should be “shift in <7 days subject to verification of address of customer's new premises in line with current order of the licensor”.

Closure: Clarity is needed for the term 'closure'. This term be defined explicitly.

However, in the interim, at the switch level, the benchmark for closure <24 hours is acceptable”.

As an interim, we propose that the benchmark should be “switch level closures in less than 24 hours”.

Additional Facility: The benchmark is acceptable.

11. Percentage of repeat faults (< 1%)

This parameter is related to the parameter 'fault incidence' at sl 2 above. As such the parameter is duplication and may be deleted.

Proposed Additional Parameters

12. Response time to the customer for Assistance

(i) % of call answered (electronically)

**within 20 seconds = 80% of all operator assisted calls;
within 40 seconds = 95% of all operator assisted calls;**

(ii) % of calls answered by operator (voice to voice):

**within 30 seconds = 80% of all operators assisted calls;
within 60 seconds = 95% of all operator assisted calls;**

It is necessary to **clarify** whether the response times for operator assisted calls are over and above the electronic response. For example, most calls are first answered electronically and only after

customer has exercised a choice does the operator come in. So the **response time for operator assisted calls** should be :

% of calls within 30 seconds (after 20 seconds) = 80%

% of calls within 60 seconds (after 40 seconds) = 95%

13. Time taken for refund of deposits after closures

The parameter with proposed benchmark of 100% refunds within 60 days of closure may be **acceptable**.

B) SUBJECTIVE PARAMETERS

14. Customer perception of services

- (i) %age satisfied with the provision of service (>95 %)**
- (ii) %age satisfied with the billing performance (>90%)**
- (iii) %age satisfied with help services (>90%)**
- (iv) %age satisfied with network performance, reliability and availability (> 95%)**
- (v) %age satisfied with maintainability (>95 %).**
- (vi) Overall customer satisfaction (>95 %)**
- (vii) Customer satisfaction with offered supplementary services %age satisfied (> 95 %)**

This is highly subjective and based on customer surveys. In fact the subjective ranking can be highly misleading at times. Further this is not a TRAI function. Subjective QoS surveys are generally carried out by 3rd Parties/ media etc and Regulator should ideally have no role in this.

II. CDMA MOBILE SERVICE

(A) OBJECTIVE PARAMETERS

Existing Parameters

1. **Fault incidence (Number of faults/ 100subs/ month) & Faults cleared within 24 hours.**

This parameter being less relevant to mobile service may be **deleted**.

2. **Call Success rate**

In place of this parameter, as mentioned in the consultation paper, Call Set up Success Rate may be included as it is the ratio of established calls to attempts and covers complete signalling process in the call set up. (Established calls mean attempt is made, TCH is allocated and outward routing to concerned MSC taken place).

Proposed Additional Parameters

3. **Call Set up Success Rate**

Our comments are as in (A) 2 above.

4. **Blocked Call Rate**

This parameter may **not** be **required** as it automatically gets covered in network and POI congestion related parameters for CDMA such as paging channel occupancy and Radio channel occupancy.

5. **End Point Service Performance**

and

6. **Service Coverage**

The above two parameters are tested at the time of launch of services and are **not required for QoS** assessment by TRAI.

7. **Response Time to the customer for Assistance**

(i) **% of call answered (electronically)**

within 20 seconds = 80% of all operator assisted calls;

within 40 seconds = 95% of all operator assisted calls;

(ii) % of calls answered by operator (voice to voice):

within 30 seconds = 80% of all operators assisted calls;

within 60 seconds = 95% of all operator assisted calls;

It is necessary to clarify whether the response times for operator assisted calls are over and above the electronic response. For example, most calls are first answered electronically and only after customer has exercised a choice does the operator come in. So the **response time for operator assisted calls** should be :

% of calls within 30 seconds (after 20 seconds) = 80%

% of calls within 60 seconds (after 40 seconds) = 95%

(B) SUBJECTIVE PARAMETERS

8. Customer perception of services

- (i) %age satisfied with the provision of service (>95 %).**
- (ii) %age satisfied with the billing performance (>90%).**
- (iii) %age satisfied with help services (>90%).**
- (iv) %age satisfied with network performance, reliability and availability (> 95%).**
- (v) %age satisfied with maintainability (>95 %).**
- (vi) Overall customer satisfaction (>95 %).**
- (vii) Customer satisfaction with offered supplementary services %age satisfied (> 95 %).**

This is highly subjective and based on customer surveys. In fact the subjective ranking can be highly misleading at times. Further this is not a TRAI function. Subjective QoS surveys are generally carried out by 3rd Parties/ media etc and Regulator should ideally have no role in this.

Q 2. What are your comments on the new parameters suggested above?

- (a) Subjective parameters are not relevant for the TRAI QoS assessment.**
- (b) Some of the new suggested parameters like end point service performance, service coverage are not required as per our comments above. Some terms need to be defined very clearly.**

- (c) For CDMA, the voice quality needs to be measured in terms of FER with a long term benchmark of 4% for it to be comparable to GSM's RxQual benchmarks.

CHAPTER 3

Empowerment of TRAI for imposing penalty

Q 1. Whether TRAI should also be empowered to impose penalty on the service providers for non-compliance of certain key standards laid down in the regulation?

No.

TRAI Act 1997 as amended by Amendment Act 2000 (Section 3a) provides necessary power to TRAI in this connection. Further empowerment of TRAI may not be necessary/ called for.

Q 2. If yes, then what should be the quantum of the penalty and what parameters should be identified as key parameters?

No comments in view of our response in Q.1 above.
