

From: sanrakshan for u <sanrakshan_goal@yahoo.co.in>
To: "advqos@traf.gov.in" <advqos@traf.gov.in>
Cc: ved verma <sroqos@gmail.com>
Date: Tue, 11 Dec 2012 19:33:54 +0800 (SGT)
Subject: Re: Fwd: comments on consultation paper on metering and billing regulations
Hi,

Please find attached my comments on the consultation paper on metering and billing regulations.

J. K. Bhagat
Managing Trustee,
SANRAKSHAN,
101, Ashray Mahesh Apartment,
Behind Pandui Place,
Boring Road,
Patna -800001
Mob: +919431496489
TRAI/CAG//072012-CA

**Comments on Consultation Paper on
Review of The Quality of Service (Code of Practice for metering &
Billing Accuracy) Regulations, 2006**

Question 1: What are your views on imposing financial disincentives for delay in submitting audit reports of the metering and billing system and what should be the quantum of such financial disincentives? Please give your comments with justification.

Comments: The imposition of disincentives for delay in submitting audit reports can be revised to Rs. 25,000/- for first 10 days. Exceeding this limit, they may be charged Rs. 50,000/- till they submit the report.

Question 2: What are your views on imposing financial disincentives for delay in submission of Action Taken Reports on audit observations of the metering and billing system and for providing false information or incomplete information and what should be the quantum of such financial disincentives? Please give your comments with justification.

Comments: The imposition of disincentives for delay in ATR can be revised to Rs. 25,000/- for first 5 days. Exceeding this limit, they may be charged Rs. 50,000/- till they submit the report.

On furnishing incomplete or wrong information, a financial disincentives of Rs. 5,00,000/- should be imposed provided they submit the rectified ATR within 5 days. If failed to provide within 5 days, a financial disincentives of Rs. 10,00,000/- should be imposed.

Question 3: What are your views on the proposal for audit of the CDRs for at least twice a year- three months CDR pertaining to first half year and three months CDR pertaining to second half year? Please give your comments with justification.

Comments: This seems to be a positive step benefitting the consumers. Need no suggestions.

Question 4: What are your views on the proposal for simultaneous reporting of instances of overcharging to TRAI by the auditor, monthly progress report on the action taken by service providers on such audit observations and financial disincentives on delayed refund of such overcharged amounts? Please give your comments with justification.

Comments: This seems to be a positive step benefitting the consumers. Need no suggestions.

Question 5: Do you support mandating service providers to undertake a thorough analysis of each audit observations and their requirement to

furnish a detailed comment on each audit observation, as proposed above, including financial disincentives for submitting audit reports without adequate comments? Please give your comments with justification.

Comments: This seems to be a positive step benefitting the consumers. Need no suggestions.

Question 6: Do you support nomination of auditor by TRAI and appointment of the nominated auditor by the service provider? Please give your comments with justification.

Comments: The nomination of auditor by TRAI is a correct decision to make auditors free from the influence of service providers.

Question 7: What are your views on the proposal for fixing of remuneration of auditor by TRAI and what should be the quantum and methodology for computation of audit fees, in case the same is to be fixed by TRAI? Please give your comments with justification.

Comments: The remuneration needs to be fixed as per TRAI rules.

Question 8: What are your views on the proposals relating to tariff plans to be covered for audit? Please give your comments with justification.

Comments: I agree with the proposal relating to the tariff plans to be covered for audit.