

## **SURABHI SANSKRITIKA SEVA KALYAN SAMITI**

A-63, Police Colony, Gandhi Vihar, Anisabad, Patna – 800002 (Bihar)  
(Regd. Under S.R. Act 21/1860, F.C.R.A. – 1976 & I.T. Act – 1976 Under Central Govt.)

(TRAI/CAG/08/2012-CA dt – 24-04-2012)

Ref : .....

Date : .....

To,  
Shri A. Robert J. Ravi  
Advisor (CI & QoS)  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg, (Old Minto Road)  
New Delhi – 110002

**Subject :** Consultation paper on “Review of The Quality of Service (Code of Practice for Metering & billing Accuracy) Regulations, 2006”.

Sir,

This is with reference to the TRAI’s invitation for comments on the above mentioned consultation. In this context our comments are as follows:

**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.**

**Answer :** In our view imposing financial disincentives for delay in submitting audit reports is correct and the quantum of disincentives (i.e. Rs. 50000 for each day of delay) is satisfactory as a timely audit report holds more importance than a delayed one, because it helps in controlling any fault, non-compliance or error within time.

**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.**

**Answer :** Non action on Audit Observation is not a huge violation so as to attract such a huge penalty, but it should be seen that any non-compliance, errors are duly taken care of. But disincentive for providing false information

or incomplete information is satisfactory, because incomplete/false information can cause more damage than no information.

**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.**

**Answer :** We are in agreement with the proposal for audit of the CDRs for at least twice a year as it will cost-effective, will save time as the need of reloading archived CDRs in the billing system will be considerably reduced, can avoid delay in submission of audit reports and timely refund of overcharges to the affected customers will be possible.

**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.**

**Answer :** We are in agreement with the proposal. TRAI should charge a financial disincentive equivalent to the amount of overcharged because customers are main stakeholders of any service providers, and their convenience is of utmost importance.

**Question 5: Do you support mandating service providers to undertake a thorough analysis of each audit observations and the 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.**

**Answer :** We are in agreement with the Proposal.

**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.**

**Answer :** Yes, We support nomination of auditor by TRAI and appointment of the nominated auditor by the service provider, because it will help in nomination of auditors on their experience basis rather than on the bid submitted. This will produce quality results.

**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.**

**Answer :** This should be decided after discussions with auditors and after considering the audit cost involved.

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

**Answer :** We are in agreement with TRAI's proposal.

This is for your kind consideration.

With Regards

For **SURABHI SANSKRITIKA SEVA KALYAN SAMITI**

(Sant Lal Jha Suman)  
Chairman

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