

Response from Bharti Airtel Ltd to TRAI DRAFT Regulation on The Standards of Quality of Service of Basic Telephone Service (Wireline) and Cellular Mobile Telephone Service (Fourth Amendment), 2014

The TRAI through the Second Amendment to the Standards of Quality of Service of Basic Telephone Service (Wireline) and Cellular Mobile Telephone Service Regulations, 2009 introduced financial disincentives with the objective of strengthening the effectiveness and compliance of the regulations as it was observed that the telecom service providers were repeatedly not meeting the quality of service benchmarks for some of the parameters and there was no consistent improvement noticed in spite of the measures taken by TRAI.

Through this amendment, TRAI is proposing to enhance the financial disincentive for not meeting the benchmarks for cellular mobile telephone service for network and customer service parameters for repeat non-compliance in successive quarters so that the regulations are effectively implemented as the deterrent is being increased by Rs 50,000/- every quarter upto the fourth quarter and thereafter capped at a maximum of Rs 200,000/- for subsequent quarters.

We are not in agreement with the proposed increase in financial disincentive as we feel this is not necessary. In the Explanatory Note to this DRAFT Regulation (Amendment), TRAI has stated:

*“4. ... and it is observed that in many cases, the present amount of financial disincentives has not acted as a sufficient deterrent against non-compliance as there have been repeated cases of non-compliance with the benchmarks, **though the % of non-compliance has decreased**. This indicates lack of commitment or initiative on the part of the cellular mobile telephone service providers to improve the quality of service.”*

TRAI's explanatory memorandum acknowledges that the percentage of non-compliance has decreased which only shows that there has been an improvement - this would not have been possible without considerable efforts from telecom service providers to reduce the non-compliance. In a highly competitive market, there is increased pressure to deliver good quality services to the customers and Bharti Airtel being sensitive to the regulations and market environment, makes all out efforts to meet the quality of service benchmarks for various network and customer service parameters specified by TRAI. We therefore believe that the present framework is adequate and there is no need for introducing additional financial disincentives.

While carrying out the third amendment, TRAI had decided to review some benchmarks recognizing the problems faced by TSPs due to reasons which were beyond their control and thereby sought views of stakeholders.

With this context, we would look forward to TRAI's support in reviewing the benchmarks for Quality of Service Parameters especially some of the customer service parameters as it is not possible to meet the benchmark of 100% as listed below – this will considerably help improve the compliance thereby minimizing repeat instances of non-compliance:

1) Percentage of calls answered by the operators (voice to voice) within 90 seconds (benchmark: $\geq 95\%$):

This parameter has been made more stringent instead of relaxing the same. Earlier the parameter was 90% of the calls to be answered in 60 seconds. While TRAI has increased the time from 60 secs to 90 secs, TRAI has also raised the benchmark from 90% to 95%.

As a result of the same, we feel there is no relaxation given to TSPs despite the problems we have cited in our response to the consultation held then. We stand committed to serve our growing customer base and the rise in call volumes due to increase in subscriber base is not the reason why we are failing to meet the benchmark for this parameter.

We take this opportunity to represent our views once again as we feel these are reasons for which TSPs have no control over – we feel that TRAI has not considered these while reviewing this parameter and the benchmark:

- The attrition rate of customer care agents at the call centres is very high i.e. upto 30%, which poses massive challenge in maintaining the required capacity at call centers at all times. Also, absenteeism of the agents is very high specifically during various festival seasons and examination period.
- Apart from the capacity issue, there are other unforeseen instances wherein the call center operations are disrupted due to local holidays, government orders, etc.
- Due to number of strikes / protests and Bandhs called by political / social organizations like we witnessed recently in case of Bandhs in Telengana, curfew in J&K service area, etc, the agents are not able to report at the call center thereby affecting the count of call centre agents answering customer calls.
- Attendance in Call centers is also impacted during monsoon/winter season in certain parts of the country due to heavy rains, floods, fog, snowfall and such seasonal disruptions / natural calamities like floods, etc for which any kind of forecasts will not hold good thereby impacting capacity at the Call Centre to answer / receive calls.
- The call centre traffic forecast is done approximately 1 quarter in advance in a scientific manner given the normal traffic conditions and projected customer growth so that the Call Centre is able to gear up with the forecasted increase in traffic volume. However, despite this traffic forecasting and adequacy in number of agents who will handle the traffic, there may be an unforeseen spike for some time owing to new products that get launched in view of the market dynamics (competition launching schemes / offers / products which need to be matched) or customer behavior which cannot be predicted resulting in increased calls from customers – hence the forecasting of call volumes goes awry and we are unable to meet the benchmarks. This problem gets accentuated if other factors like strikes, floods / heavy rains, etc happen which results in reduced attendance at the Call Centre.

In view of the above reasons which are beyond the TSP's control, we would like to state that only due to 2 - 3 days of disruption in the call center operation on account of the above mentioned challenges, we tend to miss the current benchmark for the entire quarter. Therefore, we request that benchmark for this parameter be reviewed.

- 2) Period of applying credit / waiver / adjustment to customer's account from date of resolution of complaints (100% within 7 days).**
- 3) Time taken for refund of deposits after closure (100% within 60 days).**
- 4) Percentage of requests for termination / closure of service complied within 7 days (100%).**



For all the above three customer service quality parameters, 100% benchmark is prescribed in the regulations. We propose that these should be revised to $\geq 98\%$. While service providers constantly endeavor to meet 100% of the cases and processes are also designed accordingly, the reason for these parameters not being met are also to be acknowledged like system failures leading to the timeline not being adhered.

Our Submissions: we believe that if TRAI considers our request for review of these parameters not because service providers do not want to improve their quality of service for network and customer services parameters but due to the genuine problems faced which are beyond TSP's control, compliance levels will significantly improve. As stated earlier, TSPs operate in a fiercely competitive market and with Mobile Number Portability, Quality of Service is one of the key differentiators to retain existing customers and acquire new customers. This will automatically justify the need for not introducing this Amendment to enhance the financial disincentives on telecom service providers and there would be effective implementation of the QoS regulations.
