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Advisor (CA & QoS)
The Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
New Delhi-110002

Subject: Joint Industry response to TRAI draft “The Standards of Quality of Service of Basic Telephone Service (Wireline) and Cellular Mobile Telephone Service (Fourth Amendment) Regulations, 2014”

Dear Sir,

This is with reference to the TRAI draft “The Standards of Quality of Service of Basic Telephone Service (Wireline) and Cellular Mobile Telephone Service (Fourth Amendment) Regulations, 2014” issued on 28.01.2015.

In this regard, please find enclosed joint industry submission on the said draft Regulation as Annexure – 1.

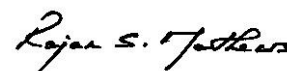
We believe that our submission will merit your kind consideration.

Thanking you,

Yours faithfully,



Ashok Sud
Secretary General
AUSPI



Rajan S. Mathews
Director General
COAI

Cc : Dr. Rahul Khullar, Chairman, TRAI
: Dr. Vijayalakshmy K Gupta, Member, TRAI
: Shri. Sudhir Gupta, Secretary, TRAI

Joint Industry Response on TRAI Draft “The Standards of Quality of Service of Basic Telephone Service (Wireline) and Cellular Mobile Telephone Service (Fourth Amendment) Regulations, 2014”

Our joint industry submissions to the TRAI Draft “The Standards of Quality of Service of Basic Telephone Service (Wireline) and Cellular Mobile Telephone Service (Fourth Amendment) Regulations, 2014 are as highlighted below:

1) **Provision for Graded Penalty :**

- a) While we appreciate the intent of enhancing the penalty for repeat performance short- fall, however the suggested penalty slab is too steep & harsh and it does not consider any improvement made over previous performance. Also, the Authority is well aware that industry today operates under lot of constraints which are at times beyond their direct control. Situations like bandhs & strikes, Coverage restriction compliance at border, and other security zones, External interference, disruptions due to society / govt. agencies, unusual service consumption behavior on special / specific days negatively impact the performance. Thus we have following recommendations to make:-
- i) The standard penalty for the first instance of missing the benchmark for any specific parameter remains same as currently i.e. INR50,000 per instance.
 - ii) The successive (immediate recurrence) defaults may attract additional penalty (over & above standard penalty) based on suggested “**FINANCIAL DIS-INCENTIVE MATRIX**” as given below.
 - iii) Additional penalties for 2nd & 3rd consecutive default should not be imposed if improvement in performance is observed over previous quarter. However, if the performance short-fall is observed for 4th successive time then penalty (both standard + additional) should be imposed irrespective of improvements registered.

FINANCIAL DISINCENTIVES MATRIX (for performance short-falls)	Band 1 (>90% Achieved)	Band 2 (75% - 90% Achieved)	Band 3 (< 75% Achieved)
1 st Instance	Standard Penalty @ 50 K per Instance		
2 nd Consecutive Default	Standard 50K	Standard 50K + Addnl 10K	Standard 50K + Addnl 25K
3 rd Consecutive Default	Standard 50K + Addnl 10K	Standard 50K + Addnl 25K	Standard 50K + Addnl 50K
4 th Consecutive Default	Standard 50K + Addnl 25K	Standard 50K + Addnl 50K	Standard 50K + Addnl 100K

- iv) The performance band for computing extent of performance short-fall is **enclosed as Annexure A.**

2) Common exclusions for external factors beyond control of operators:

- a) Further, to the above we request TRAI not to levy any penalty on our members in case they are not able to comply with the benchmarks due to some external factors beyond their control. Some of the common exclusions on which we request TRAI to provide concessions to our members are as highlighted below:
- i) **Interference** – Exclusion should be provided for cells getting interfered due to same frequencies are being used by own Government / Agencies / neighboring country. Interference has direct impact on **Call drop, Voice quality, CSSR** etc.
 - ii) **Border site and other security zones coverage restriction** – As a part of compliance, the service coverage should be restricted to the Licensed Service Area itself. To ensure the same, TA (Timing Advance) Limit is applied which is resulting into **call drops, poor voice quality and CSSR**. Hence exclusion should be provided for these cells. Further, some specified security zones do not allow erecting of towers; thereby quality of service in such zones cannot be guaranteed.
 - iii) **Local Law & Order issues such as Riots/bandh** – Site access is difficult in case of Law & Order problems. Delay in restoration of site has direct impact on outage and indirect impact on neighboring sites in terms of **SDCCH / TCH blocking, TCH drop, voice quality**. Hence we request that exclusion should be provided for such days.
 - iv) **Cell having less than 100 calls per day** - We are of the view that very low call volume cells i.e. Cell having less than 100 calls per day, needs to be excluded from the QoS compliance. Currently, as per the TRAI QoS Regulation “% of cells having drop more than 3%” is being reported by the operators. Since this parameter is reported in terms of “%” even 3-4 call drop per day in these cells put this parameter of an operator under noncompliance. It is very difficult to optimize those cells wherein call volume and drop count is so low.

3) Issue regarding Methodology for reporting of % of cells with TCH drop>3% for QoS:

The issues pertaining to the methodology prescribed by TRAI for reporting of % of cells with TCH drop>3% for QoS was highlighted by us in response to the TRAI Consultation Paper on Review of the Standards of QoS of Basic Telephone Services (Wireline) and Cellular Mobile Telephone Services.

In this regard, we would once again like to make following submissions on the issue:

There are two methods for calculating the Parameter of “worst affected cells i.e. TCH drop>3%”

- a) **First Method: As per the TRAI Regulations** “worst affected cells i.e., TCH drop>3%” should be reported based on their monthly performance, i.e. (i) Operators first calculate the total TCH Drops in each cell in a month and then identify the cells exceeding TCH drops for more than 3%. Having identified, such cells, they calculate the % age of cells having more than 3% TCH drop as per the formula given in the Regulations 2009.
- b) **Second method: TRAI vide its letter dated April 1 have defined following method for reporting TCH drop:** (ii) Calculating the Number of Cells exceeding 3% TCH Drop on each

day of the month and then averaging the same for the entire month. After calculating the average value of cells having TCH drops more than 3% for a month, the % age of such cells is calculated by the given formula in the Regulations 2009.

- i) We recommend the first method to be followed in calculating the performance in respect of the Parameter “worst affected cells, i.e. TCH drop>3%”. Since this is a monthly report and with this reporting the intention of the Operator & Regulator is to identify cells, which are consistently breaching the Drop Call Rate threshold. Therefore, this method helps operators in identifying the consistently poor performing cells and work upon those, thereby improving the Network performance and customer experience. Also, this is a straight calculation and no averaging involved.
- ii) Further, as per TRAI’s Regulations, Operators are reporting “worst affected BTS i.e. outage>24 hours” based on the monthly performance of BTSs. Therefore, we suggest that there should not be two different methodologies followed to measure two similar parameters such as “worst affected BTS” and “worst affected cells”.
- iii) The second method requires ‘calculating the Drop Call Rate cell wise on a daily basis and then averaging it for the month’. We strongly believe that the same is not an appropriate method for calculation as in this method, there is an element of averaging involved, due to which if a cell breaches the benchmark only for a day or two, it may also get included in the monthly “% of cells with DCR>3%” list and gives a wrong picture of the Network performance.
- iv) However, the first method helps the service providers to identify the consistently defaulting cells (and not those cells which may have temporarily defaulted). Thus, for internal improvement, using first method is a more appropriate approach since we work towards correcting the consistently defaulting cells. **(Analysis of TCH Drop cell wise for the reporting on both the methods is enclosed as Annexure - B)**

We request TRAI to kindly prescribe the first method to be followed by operators for calculating the performance in respect of the Parameter “worst affected cells i.e. TCH drop>3%”.

- 4) **TRAI needs to revisit some of the QoS Benchmarks, through a holistic consultation process.**
 - a) We also request TRAI to kindly engage with the Industry on re-visiting some of the Network Related (like 2% for worst affected BTS and 3% for Worst affected cells) and Consumer related Benchmarks, through a holistic consultation process.
 - b) TRAI vide its consultation may also look at relaxing the current benchmarks of following parameters to $\geq 98\%$, which is currently expected to be 100%:
 - i) period of applying credit / waiver / adjustment to customer’s account from date of resolution of complaints (100% within 7 days)
 - ii) Time taken for refund of deposits after closure (100% within 60 days)
 - iii) Percentage of requests for termination / closure of service complied within 7 days (100%)

c) Further, specific issues such as highlighted below may also be considered by TRAI in its consultation

i) Percentage of Calls Answered by Operators (voice to voice) within 90 secs: \geq 95%:
On this issue, we would like to submit that TRAI while reviewing the QoS parameters/benchmarks recently, had increased the targets of this parameter from 90% to 95%, also the response time was increased from 60 sec to 90sec. We believe that tough TRAI considered the industry submissions on the difficulties being faced in meeting this benchmark has put more pressure on the operators by raising the targets. We recommend that the targets of this parameter may again be reviewed through a consultation.

ii) We would also like to suggest that calls to general enquiry contact center numbers of member operators be excluded from measurement of this parameter 'Percentage of calls answered by the operators (voice to voice)' i.e. only those calls made on complaint and service request number 198 should be considered for measurement of the parameter.

Industry summary Submission:

- 1) **We request TRAI to prescribe provision for graded penalty rather than flat rate penalty.**
- 2) **We request TRAI not to levy any penalty on our members in case they are unable to comply with the benchmarks due to some external factors beyond their control such as Interference, Border site coverage restriction, Local Law & Order issues etc.**
- 3) **Regarding Methodology for reporting of % of cells with TCH drop $>$ 3% for QoS, we request TRAI to kindly prescribe the first method (i.e. based on operators monthly performance as highlighted above), to be followed for calculating the performance.**
- 4) **Further, to the above we also request TRAI to kindly engage with the Industry on re-visiting some of the Network Related and Consumer related Benchmarks, through a holistic consultation process.**

PERFORMANCE BANDS FOR COMPUTING EXTENT OF PERFORMANCE SHORT-FALL Annexure - A

Function	Parameter	QOS Benchmark	Incremental Penalty Bands		
			Band 1 (More than 90% Achieved)	Band 2 (75% - 90% Achieved)	Band 3 (< 75% Achieved)
Consumer related Parameters	(i) Metering and billing credibility - post paid	≤ 0.1%	< 0.110%	0.110% - 0.130%	> 0.130%
	(ii) Metering and billing credibility - pre paid	≤ 0.1%	< 0.110%	0.110% - 0.130%	> 0.130%
	(iii) Resolution of billing/charging complaints within 4 weeks	≥ 98%	> 88.2%	88.2% - 73.5%	< 73.5%
	(iii) Resolution of billing/charging complaints within 6 weeks	≥ 100%	> 90%	90% - 75%	< 75%
	(iv) Period of applying credit/ waiver/ adjustment to customer's account from the date of resolution of complaints	100% within one week	> 90%	90% - 75%	< 75%
	(v) Accessibility of call centre/ customer care	≥ 95%	>85.5%	85.5% - 71.2%	< 71.2%
	(vi) Percentage of calls answered by the operators (voice to voice) within 90 seconds	≥ 95%	>85.5%	85.5% - 71.2%	< 71.2%
	(vii) %age requests for Termination / Closure of service complied within 7 days	100%	> 90%	90% - 75%	< 75%
(viii) Time taken for refund of deposits after	100% within 60	> 90%	90% - 75%	< 75%	

	closures	days			
Function	Parameter	QOS Benchmark	Band 1	Function	Parameter
Network Parameters	(i) Network Availability				
	BTSs Accumulated downtime (not available for service)	≤ 2%	<2.20%	2.20% - 2.50%	> 2.50%
	Worst affected BTSs due to downtime	≤ 2%	<2.20%	2.20% - 2.50%	> 2.50%
	(ii) Connection Establishment (Accessibility)				
	Call Set-up Success Rate (within licensee's own network)	≥ 95%	>85.5%	85.5% - 71.2%	< 71.2%
	SDCCH/paging Channel Congestion	≤ 1%	<1.10%	1.10% - 1.25%	> 1.25%
	TCH Congestion	≤ 2%	<2.20%	2.20% - 2.50%	> 2.50%
	(iii) Connection Maintenance (Retainability)				
	Call Drop Rate	≤ 2%	<2.20%	2.20% - 2.50%	> 2.50%
	Worst affected cells having more than 3% TCH drop	≤ 3%	< 3.30%	3.30% - 3.75%	> 3.75%
	Connections with good voice quality	≥ 95%	>85.5%	85.5% - 71.2%	< 71.2%
	(iv) Point of Interconnection (POI) Congestion (on individual POI)	≤ 0.5%	< 0.55%	0.55% - 0.63%	> 0.63%

Annexure - B		As per TRAI main guideline												
		Day1	Day 2	Day3	Day4	Day29	Day30	Sum	TCH Drop	
Cell1	No of Call Drops	0	0	0	5	4	5	14	1.28%	
	No of call estd succ	182	218	164	181	142	208	1095		
Cell2	No of Call Drops	6	5	7	8	3	7	36	3.13%	No of cell having TCH Drop>3% = 1
	No of call estd succ	198	229	189	220	163	150	1149		
Cell3	No of Call Drops	50	40	80	30	60	70	330	2.97%	
	No of call estd succ	1800	2000	1900	2100	1500	1800	11100		
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Cell1000	No of Call Drops	3	2	5	0	6	2	18	1.71%	
	No of call estd succ	131	169	174	202	193	182	1051		

		As per TRAI revised guideline											
		Day1	Day 2	Day3	Day4	Day29	Day30	TCH Drop	
Cell1	No of Call Drops	0	0	0	5	4	5	1.33	
	No of call estd succ	182	218	164	181	142	208		
	TCH Drop	0	0	0	2.76	2.82	2.40		
Cell2	No of Call Drops	6	5	7	8	3	7	3.18	No of cell having TCH Drop>3% = 2
	No of call estd succ	198	229	189	220	163	150		
	TCH Drop	3.03	2.18	3.70	3.64	1.84	4.67		
Cell3	No of Call Drops	50	40	80	30	60	70	3.05	
	No of call estd succ	1800	2000	1900	2100	1500	1800		
	TCH Drop	2.78	2.00	4.21	1.43	4.00	3.89		
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Cell1000	No of Call Drops	3	2	5	0	6	2	1.76	
	No of call estd succ	131	169	174	202	193	182		
	TCH Drop	2.29	1.18	2.87	0.00	3.11	1.10		