

To,  
Smt. Vinod Kotwal, Advisor (F&EA),  
Telecom Regulatory Authority of India,  
[advisorfea1@traigov.in](mailto:advisorfea1@traigov.in)

## **TRAI Consultation Paper on Compensation to the Consumers in the Event of Dropped Calls dated 4th September, 2015**

### **Issues for Consultation**

**Q1: Do you agree that calling consumers should not be charged for a call that got dropped within five seconds? In addition, if the call gets dropped any time after five seconds, the last pulse of the call (minute/second) which got dropped, should not be charged. Please support your viewpoint with reasons along with the methodologies for implementation.**

VOICE Comment:

- Calling Consumer **should not be charged at all** for any dropped irrespective of when it was dropped because the last 5 seconds only may contain the call purpose.
- For every call dropped, Calling Consumer on making the repeat call not only has to apologise for the dropped call, will have to repeat the conversation to bring back the context before stating the purpose / completing the call thereby making a much longer call than envisaged originally thereby spending more than double the intended call charges.
- And imagine the fate of the Calling Consumer in the event of an emergency!

**Q2: Do you agree that calling consumer should also be compensated for call drops by the access service providers? If yes, which of the following methods would be appropriate for compensating the consumers upon call drop:**

- (i) Credit of talk-time in minutes/ seconds**
- (ii) Credit of talk-time in monetary terms**
- (iii) Any other method you may like to suggest**

**Please support your viewpoint with reasons along with the methodologies for implementation.**

VOICE Comment:

- Calling Consumer should be compensated in monetary terms as compensation in Talk-Time will lead to disputes w.r.t. the current Tariff plan and any change in Tariff plan before the credit is utilised.
- The compensation should be for every call-dropped individually and should be cumulated in case the follow-up call is also dropped and so on. AND no expiry date on such credits as well.

**Q3: If the answer to the Q2 is in the affirmative, suggest conditions/limits, if any, which should be imposed upon the provision of crediting talk-time upon call drop and usage thereof.**

VOICE Comment:

- The only condition should be a Call-Drop situation.
- There should not be any limit to the compensation.
- Usage of the compensation should entirely be at the discretion of the Calling Consumer
- Compensation should include the loss to Calling Consumer as well as a penalty element

**Q4: Is there any other relevant issue which should be considered in the present consultation on the issue of call drops?**

VOICE Comment:

- **TSPs argument that if Customers are not satisfied they can always opt for MNP is no solace as almost all the TSPs in Delhi and Mumbai are providing same bad services as far as Call-Drops are concerned.**
- **It is quite obvious from the data analysed in the Consultation paper that all the symptoms like lack of investment by TSPs and stretched capacity of the Networks were visible by end 2014 itself and still no pro-active measures were undertaken by TRAI or DOT.**
- **This proposal of compensating consumers for Call-drops is like paying compensation after an accident.**
- **Actually the real penalty for TSPs (except may be one in Delhi/Mumbai whose call drop rate is within the prescribed limit) will be to strictly stop taking in additional consumers till the capacity is enhanced.**
- **TRAI should also check the suspicion that assets are being diverted from VOICE to DATA which is more rewarding for the TSPs, this is supported by the disproportionate growth of DATA over VOICE.**

**Hemant Upadhyay**  
**Advisor- IT & Telecom**

**18/09/2015**

Consumer VOICE  
O-45, Basement, Lajpat Nagar II, Ring Road  
New Delhi-110024  
Ph. 011-24370455 / 47331025 Fax 011 24379081  
www.consumer-voice.org  
<http://www.consumer-voice.org>