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**To,**

Shri Tej Pal Singh,  
Advisor (QoS-I),  
TRAI, New Delhi-110002

**No.** BSNLCO-RGLN/25/5/2023-REGLN dated 19.10.2023.

**Sub:** Comments on Consultation Paper on Review of Quality-of-Service Standards for Access Services (Wireless and Wireline) and Broadband Services (Wireless and Wireline).

Please find attached herewith the comments of BSNL on the consultation paper on the subject matter.

**Encl:** A/a

Yours faithfully



19.10.2023  
(Ved Prakash Verma)  
DGM (Regulation-II)  
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Sl. No.	Chapter No.	Regulation No./Clause No.	Proposed provision in consultation paper	Suggested modification	Justification/ Global references with supporting data points if any	
	<b>Chapter 3</b>	<b>Section III/ SI No 6 A</b>				
1		<b>(i) Network Availability</b>  (a) % of commissioned cells for which geospatial service coverage map is available on service provider's website	100%	Not recommended	As confidentiality/commerciality is involved, the decision to share such specific & salient data should be left with the concerned operator	<b>NEW</b>
2		(b) Accumulated downtime (Cells not available for service)	<=1%	<=2%	Proposed provision in consultation paper is too stringent	
3		(c) Worst affected Cells due to downtime (Cells not available for service for more than cumulative 24 hrs. in a month)	<=1%	<=2%	Proposed provision in consultation paper is too stringent	
4		(d) Reporting of significant network outage to the Authority within 24 hrs of start of the outage (Services not available in a district or State for more than 4 hours)	100%	100%	No Comments	<b>NEW</b>
5		<b>(ii) Voice Connection Establishment (Accessibility)</b>  (a) Call Set-up Success Rate for Circuit Switched Voice or Session Establishment Success Rate for VoLTE or DRB Accessibility success rate for	>=98%	Agreed	No Comments	
6		(b) SDCCH Congestion/ Paging Channel Congestion/ RRC Congestion	≤1%	Agreed	No Comments	
7		c) Traffic Channel congestion i.e. TCH, RAB, E-RAB, EN-DC (E UTRAN New Radio Dual Connectivity for NSA to access 4G and 5G both networks at same	≤2%	Agreed	4G/5G related parameters should be made applicable to BSNL only after the full roll out of 4G services.	
8		<b>(iii) Voice Connection Maintenance (Retainability)</b>  (a) Network QoS DCR Spatial Distribution Measure for I. Circuit Switched (2G/3G) network [CS_QSD(92, 92)] II. Packet Switched (4G/5G and beyond) network [PS_QSD(96, 96)]	<=2%  <=2%		4G/5G related parameters like PS Qsd/Qtd/UL-PDR/DL-PDR etc should be made applicable to BSNL only after the full roll out of 4G services.	
9		(b) Network QoS DCR Temporal Distribution Measure for I.Circuit Switched (2G/ 3G) network [CS_QTD(97, 90)] II. Packet Switched (4G/5G and beyond) network [PS_QTD(97,96)]	<=3%  <=3%			
10		(d) DL Packet Drop Rate for Packet Switched Network (4G/5G and beyond)	<=2%			
11		(e) UL Packet Drop Rate for Packet Switched Network (4G/5G and beyond)	<=2%			
12		<b>(iv) Messaging:</b> Successful SMS delivery within service provider's network in less than 20 seconds	>=95%		Successful SMS delivery within service provider's network within 20 seconds is possible only if  1. If there is no Incoming SMS barring for the called number. 2. If the no. of identical messages are less than 200 in an hour as per TRAI guidelines. 3. No handset related issues at customer end like Message inbox full, Mobile power Off etc. 4. No unforeseen network related issues.	<b>NEW</b>
	<b>Chapter 3</b>	<b>Section III/ SI No 7</b>				
13	3	Point of Interconnection (POI) Congestion for interconnection with circuit switched network(2G/3G) (on individual POI) at LSA level	≤0.5%	Agreed	No Comments	
14	4	Point of Interconnection (POI) performance for interconnection between packet switched networks(4G/5G) at LSA level	(i) Latency<30ms (ii) Jitter<20ms (iii) Packet loss<1%	Too stringent	4G/5G related parameters should be made applicable to BSNL only after the full roll out of 4G services.	

		SECTION VII/ clause 17				
15		Consequences for the failure of the service providers to pay financial disincentive within the stipulated time	If a service provider fails to make payment of financial disincentive under regulation 15 or regulation 16 within the stipulated period, it shall be liable to pay interest at a rate which will be 2% above the one year Marginal Cost of Lending Rate (MCLR) of State Bank of India existing as on the beginning of the Financial Year (namely 1st April) in which last day of the stipulated period falls. The interest shall be compounded annually.	The clause should be omitted	The Authority's observation that FD payment is kept alive by TSPs on frivolous grounds is one way decision of Authority. The grounds which seems to be frivolous to Authority might be valid and logical from the perspective of TSPs. It has happened many times in past. It may be examined further that FDs imposed on TSPs, particularly under these regulations (i.e. QoS for wireless, wireline and Broadband services) which are under consultation, there might not be any case of such delay. The Authority even did not review once FD is imposed. This is unfair and unjustified. The Authority is requested to review this clause judiciously. It is proposed that an Appellate Authority may be appointed to address such cases. Further, similar to TRAI, the government TSPs also face the Audit where on payment of such FD amounts they also attracts adverse audit observations.	NEW
16	3	3(1)(x) Parameter- Resolution of billing/charging complaints within six weeks	TRAI proposes having only one benchmark i.e., 100% complaints are to be resolved within six weeks	AGREED		
17	3	3(1)(xiv) Parameter- Refund of deposits within 45 days of closures	Time taken for refund of deposits after closure is 100% within 45 days.	The existing provision of time taken for refund of deposits after closure within 60 days is already compressed and should not be reduced further.	In case of postpaid monthly billing cycle , the account finalisation takes place in the subsequent month of closure date as the CDRs are to be rated and billed for the period prior to disconnection. Hence, even after extensive digitization, the activities of verification of deposits, closure , account finalisation , refund voucher generation and effecting payments can not be further crashed.	
	5	<b>Measuring Methodology</b>				
18	5	2.7 Resolution of billing/charging complaints	TRAI proposes having only one benchmark i.e., 100% complaints are to be resolved within six weeks. Calculation methodology is	AGREED		
19	5	2.11 Time taken for a refund of deposit after the closure of telephone/ termination of service	The refund of all deposits is to be made within <b>45 days in 100% of the cases, in place of 60 days</b> under present regulations.	The existing provision of time taken for refund of deposits after closure within 60 days is already compressed and should not be reduced further.	In case of postpaid monthly billing cycle , the account finalisation takes place in the subsequent month of closure date as the CDRs are to be rated and billed for the period prior to disconnection. Hence, even after extensive digitization, the activities of verification of deposits, closure , account finalisation , refund voucher generation and effecting payments can not be further crashed.	
		<b>B. Customer Service Quality Parameters (Page 81)</b>				

20		3.11 Time taken for refund of deposits after termination of service:	The refund of all deposits is to be made within <b>45 days in 100% of the cases, in place of 60 days</b> under present regulations.	The existing provision of time taken for refund of deposits after closure within 60 days is already compressed and should not be reduced further.	In case of postpaid monthly billing cycle , the account finalisation takes place in the subsequent month of closure date as the CDRs are to be rated and billed for the period prior to disconnection. Hence, even after extensive digitization, the activities of verification of deposits, closure , account finalisation , refund voucher generation and effecting payments can not be further crashed.
		<b>7. Framework for Online Reporting of Performance of Quality-of-Service Parameters</b>			
21		Reporting	Periodicity of PMK submission is proposed to be reduced to monthly instead of quarterly by switching to online mode	It is suggested to continue with present periodicity i.e. Quarterly	Circlewise/Statewise/ UT has to be compiled which is a time taking task and hence monthly report is not possible.
		<b>9. Financial Disincentives (FD):</b>			
		<b>9.5 -Revised Financial Disincentives for QoS benchmark failures</b>			
22		9.3(i) Basic Service (Access Service Wireline)	<b>Grading for all services.</b> (i) financial disincentive of <b>not exceeding rupees one lakh per benchmark against specified parameter for the first contravention.</b> This is same as applicable for Cellular Mobile Telephone Service(CMTS) under present regulations. (ii) if the service provider fails to meet the benchmark of the same parameter <b>consecutively in two or more subsequent months.</b> It shall be liable to pay, by way of financial disincentives, an <b>amount not exceeding rupees one lakh fifty thousand for the second consecutive contravention</b> (same as applicable currently from CMTS) and <b>not exceeding rupees three lakhs for each</b>	<b>Grading for all services.</b> (i) financial disincentive of <b>not exceeding rupees 50000/- per benchmark against specified parameter for the each contravention.</b>	Treatment of same financial disincentive across services is accepted. However, the financial disincentive for each parameter should be fixed not exceeding Rs. 50000/- due to the fact that this Financial disincentive is for each parameter and circle wise.Further, the telecom sector is exposed to severe competition which automatically drives the operators to improve QOS.
23	9.3(ii) Cellular Mobile Telephone Services (Access Service-Wireless):				
24	9.3(iii) Broadband Services				
25	9.3(iv) Wireless Data Services				
26		Section II, 3(i) Provision of a service within 7 days of payment of demand note by the applicant	100%	It should be reduced to 95%	As there can be some exceptional cases where the loop length is high particularly in rural areas
27		Section II, 3(ii) Fault incidences (No. of faults per 100 subscribers per month)	≤5	It should be replaced with ≤ 7	Because in some circles/LSAs, more than 30% of the wireline connections are working on UG copper cables which are getting damaged due to massive road work/ civil works by local governing bodies.
28		Section II, 3(iv) Fault repair within five days in Urban areas	100%	It should be reduced to 95%	Because in some circles/LSAs, more than 30% of the wireline connections are working on UG copper cables which are getting damaged due to massive road work/ civil works by local governing bodies.
29		Section II, 3(xi) Application of credit/ waiver/ adjustment to customer's account within one week from the date of resolution of complaints	100%	In the Parameter, One week shall be modified to one month	As in post paid connections the adjustments are made in next bill.

30		Section II, 3 (xiv), Refund of deposits within 45 days of closures	100%	In the Parameter, the 45 days should be replaced with 60 days	There is a lot of manual processes are involved in completing the case.	
31		Section VI, 13 (2) of Reporting	Reported and complied at state or Union Territory (UT) and Licence Service Area Level.	It should be either at state or Union Territory (UT) level or at Licence Service Area Level.		
32		Section VI, 14 (3) of Publication	Every service provider providing access service (wireless) shall publish on its website the geospatial service coverage maps indicating the street level and indoor coverage, as applicable, in cities and towns, highways, rail routes where voice or	It should be omitted	This may be made optional for TSPs. It may be left to the competition.	