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Introduction:

Some key words have been picked up from the CP ^{Ref 2} along with their frequency in current CP dealing with '**A Review of The Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2006**' for '**Accurate metering of the usage of telecom services and minimizing the incidents of billing complaints**' '**important issues for TRAI to protect the interests of the customers.**'

1.1'The word "CUSTOMER" is appearing "88" times, "Telecom Users" "1" time, "Users" "16" times, "Subscriber" "14"," interests" "2"," Complaint/Complaints" "46"," Refund" "12"," Wrong" "22", "error" 9, ("improper" "1" ,"inadequate" "1", "misleading" "1", "number" "29") times ,"reliability" "4" times, "manual process" "1" time", in the current CP.

2.The metering and billing regulations were last reviewed in 2012–13, and TRAI notified the Quality of Service (Code of Practice for Metering and Billing Accuracy) (Amendment) Regulations, 2013, (4 of 2013) on 25th March 2013 ^{Ref4.}

Q. & Ans.

Q.1: What changes are suggested in the sampling methodology in order to make it more representative of the post-paid and prepaid user segments or different types of tariff plans? Should the full spectrum of tariff plans be subject to audit? What considerations are required to be taken to address the issues or concerns related to the incidences of wrong charging specially in case of data packs, STVs, multiple tariff packs at a time, etc.? Please give your views with detailed justification.

Ans.1: No comments. Please refer Ans.8.

Q.2: How IT tools and new technologies can be used to adopt preventive and proactive ways to avoid occurrences of error in charging or wrong configurations leading to charging? Whether the IT capabilities of other systems available with the service provider may be made available to the auditor for audit purposes? How such tools developed for rigorous testing before launch of new tariff plans can also be used for audit purposes? Please give your views with detailed justification.

Ans.2: No comments. Please refer Ans.8.

Q.3: With the evolution of new technologies and mediums to provide information related to terms and conditions, tariff details to the customers at the time of subscriptions or making it available as and when required by the customers, what changes are required to assess delivery of information in timely and appropriate manner? Please give your views with detailed justification.

Ans.3: No comments. Please refer Ans.8

Q.4: What IT-enabled measures need to be considered to ensure consistency of the tariff information across the different channels or mediums? Please give your views with detailed justification.

Ans.4: No comments. Please refer Ans.8.

Q.5: What changes are suggested in handling of billing complaints? Whether defining what constitutes billing complaint may help in bringing uniformity? Whether higher frequency of audit of 37 complaint handling would help in improving effectiveness of complaint redressal mechanism? Please give your views with detailed justification.

Ans.5: No comments. Please refer Ans.8.

Q.6: To conduct special or peer audit, where old records might be required to carry out the audit, what may be prescribed to ensure that the relevant details are maintained for sufficiently long period and made available to the auditor in a timely manner for conducting the audit? Please give your views with detailed justification.

Ans.6: No comments. Please refer Ans.8.

Q.7: Should the Regulation 6C, Regulation 6D and Regulation 6E of the regulations dealing with consequence for failure of the service providers to submit audit report and action taken report, consequence for failure of the service providers to refund overcharged amounts to customers and consequence for failure to provide comments on audit observations in the Action taken report respectively be retained as it is or they need to be altered/strengthened. Please support your views with rationale.

Ans.7: No comments. Please refer Ans.8.

Q.8: Any other issues which are relevant to this subject

Ans.8: The pertinent keywords mentioned in para '3' of introduction above make the narration a nice rhetoric but subjective in nature.

2.The emphasis in CP for change in 'Regulations' is more on evolving telecom scenario in terms of, technologies, services, methodology, audit and other related operational issues. The total effect of all the said effort is nowhere quantified with specific reference to benefits accruing to subscriber alias customer alias subscriber alias user woes, complaints, queries etc. w.r.t area of **Metering and Billing Accuracy**

3.There is no way to judge from CP as to what extent the shortcomings of 2006 Regulations were overcome/addressed/mitigated by 2013 Regulations regarding QoS vis-à-vis subscriber alias customer alias subscriber alias user woes, complaints, queries etc. (the entities in this are mentioned more than '100' times in CP collectively).

3.Current CP is also silent on the quantitative improvement likely to be there regarding the concerns listed in para '2' Ans.8. above by pursuing the present exercise leading to logical conclusion of issue of relevant Regulations amending/superceding the existing regulations on the subject.

4.In the fast-changing ecosystem in telecommunication it may be difficult to have future neutral QoS Regulations. However, to achieve desired QoS the same must be quantified as:

Quality needs to be defined in measurable parameters as

Whatever is not quantified cannot be measured

And whatever cannot be measured cannot be controlled.

