

VOICE comments on-

QUALITY OF SERVICE PARAMETERS FOR MOBILE DATA SERVICES

Based on VOICE'S limited technical knowledge about the subject but regular, broad and continuous interaction with consumers from all over India, we propose **QOS should be changed to Quality of Consumer Experience (QOE)** which is more relevant to the consumers because in today's all pervasive internet usage, all consumers are not expected to be tech-savvy. Consumers are unable to identify with the technical QOS requirements. Consumers need requirements/parameters which can be experienced/ascertained by them.

Consumer perception is that their genuine concerns are not being addressed either by the TSP/ISP or TRAI since there is no direct 2-way dialogue between the consumer and TRAI.

And **CONSUMER DETRIMENT should be part of all QOS/QOE requirements.** Every non-performance on the part of TSP/ISP results in to monetary loss as well as lost opportunity to the consumer which so far has never been addressed. May be this non-recognition of CONSUMER DETRIMENT and not compensating the consumers for the same is contributing to casual attitude of TSPs/ISPs towards resolving consumer complaints.

Also, the time-lines being used by TRAI are out of synch with everyday working what with resolution deadline of 3 Hrs for a 10 hour data plan.

So, consumers need following quality benchmarks to be included while ascertaining QOS-

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| 1. Service activation | Within 1 Hr |
| 2. Change of plan request implementation | Within 1 Hr |

3 Hours is too long a time period when internet / data transactions are so vital for daily living. With payments and banking also being done through mobiles, even 3 hour window is too long.

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| 3. Minimum guaranteed download & upload speed | For every plan on offer |
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We should learn from our experience with wireline broadband. Secondly, unlike in the past today's' apps need more bandwidth to operate especially sensitive apps like payment gateway and banking. This is also required to take care of the mal-practices / MIS_SELLING being indulged into by the TSPs/ISPs by specifying

“speed upto” which is rarely achieved. In the absence of “minimum guaranteed speed” consumer is at a loss to make his complaint objective and measurable.

4. Complaint resolution

- a. Non/wrong implementation of required tariff plan Within 1 Hr
- b. Interruption of service Within 1 Hr
- c. Refunds Within 1 day
- d. Confirmatory sms for complaint and resolution Immediate

In view of the criticality of data services it is essential that complaint resolution is also expedited. Benchmarks should be specified in hours for all the resolution. There should also be a compulsory acknowledgement sms for each complaint with docket no. and also confirmatory sms for resolution of complaint as well.

5. **CONSUMER DETRIMENT/Compensation**

As has been highlighted earlier, data services are today critical for transacting day to day business for consumers. Poor QOs/QOE lead to direct monetary losses directly measurable in Rs. Apart from cost of lost opportunity. Hence it is high time compensation to consumers in relation to CONSUMER DETRIMENT is introduced. This will not only be justice given to the consumer but also will be a deterrent to the ISPs/TSPs to improve their QOS leading to improved QOE for the consumer.

In conclusion, VOICE is of the view that QOS regulations now should be taken to the next level as Telecom services have matured and can start taking lead in setting international benchmarks in CONSUMER QOE.

At VOICE, we are always available to provide any clarification or further input required to improve consumer experience.

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