



Malaysian Communications and Multimedia Commission

**PROPOSAL FOR NEW MANDATORY
STANDARDS FOR QUALITY OF SERVICE
(CUSTOMER SERVICE)**

Public Inquiry Paper

8 April 2021

This Public Inquiry Paper was prepared in fulfilment of subsections 55(1), (3) and (4), and sections 58 and 61 of the Communications and Multimedia Act 1998 [Act 588].

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PREFACE

The Commission is hereby holding a Public Inquiry on the proposal for the new Mandatory Standards for Quality of Service (Customer Service) and invites members of the public and interested parties to participate in this inquiry by making written submissions on the questions and issues raised in this Public Inquiry Paper. Submissions are also welcomed on any other relevant matters where no specific questions have been raised. All submissions should be substantiated with reasons and, where appropriate, evidence or source of reference. This Public Inquiry will commence from 8 April 2021 (Thursday) until 4 June 2021 (Friday). Written submissions, in both hard copy and electronic form, should be provided to the Commission in full by **12 noon, 4 June 2021 (Friday)** and addressed to:

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In the interest of fostering an informed and robust consultative process, the Commission may publish or make available extracts of or the entire submissions, to interested parties. Any commercially sensitive information should be provided under a separate cover and clearly marked "CONFIDENTIAL". However, for any party who wishes to make a confidential submission, a "public" version of the submission should also be provided.

Incomplete and/or late submissions will not be considered.

The Commission thanks the public and all interested parties for their participation in this consultative process and for providing their submissions and feedback.

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ABBREVIATIONS AND GLOSSARY

| | |
|-----------------------|---|
| ASN GW | Access Service Network Gateway |
| BAS | Broadband Access Service |
| CMA | Communications and Multimedia Act 1998 |
| Commission | Malaysian Communications and Multimedia Commission |
| CPE | Customer Premises Equipment |
| IVRS | Interactive Voice Response System |
| MME | Mobile Management Entity |
| MS | Mandatory Standards |
| MSC | Mobile Switching Centre |
| MSQoS | Mandatory Standards for Quality of Service |
| Public Inquiry | The Public Inquiry on the Proposal for New Mandatory Standards for Quality of Service (Customer Service) |
| Public Inquiry Paper | The Public Inquiry Paper on the Proposal for New Mandatory Standards for Quality of Service (Customer Service) |
| Public Inquiry Report | The Public Inquiry Report on the Proposal for New Mandatory Standards for Quality of Service (Customer Service) |
| PCS | Public Cellular Service |
| QoS | Quality of Service |
| SMS | Short Messaging Service |
| SGSN | Serving GPRS Support Node |
| Wired BAS | Wired Broadband Access Service |
| Wireless BAS | Wireless Broadband Access Service |

Part A Public Inquiry

1 Background

- 1.1 Price and Quality of Service (QoS) are two important parameters for consumers when it comes to making a decision on the choice of communications service provider. While information on prices are easily accessible, it is harder for consumers to obtain and discern information on QoS.
- 1.2 In Malaysia, it appears that the key competing strategy among service providers is pricing. However, as markets mature, we foresee that price based competition will become less effective and service providers may begin to compete based on QoS to differentiate themselves. Until such time, it is imperative for the Commission to determine QoS parameters to safeguard consumers interest.
- 1.3 Since 2002, the Commission has determined mandatory standards on QoS for various services as follows:
 - (a) Public Switched Telephone Network Service;
 - (b) Public Cellular Service;
 - (c) Dial Up Internet Access Service;
 - (d) Content Applications Services;
 - (e) Public Payphone Service;
 - (f) Digital Leased Line Service;
 - (g) Wired Broadband Access Service; and
 - (h) Wireless Broadband Access Service.
- 1.4 Currently, the most prevalent communications services in the market are broadband and public cellular services. Therefore, this Public Inquiry focuses on the Mandatory Standards for Public Cellular Service (PCS), Wireless Broadband Access Service (Wireless BAS) and Wired Broadband Access Service (Wired BAS).

2 Feedback

- 2.1 This Public Inquiry sets out the Commission's proposals for mandatory standards on customer service.
- 2.2 This Public Inquiry Paper constitutes the formal consultation process and all persons will have an opportunity to respond to this Public Inquiry Paper by 4 June 2021. Any comments that are

received at the conclusion of the Public Inquiry period will be considered by the Commission in arriving at its final views of the proposals in the Public Inquiry Report.

3 Legislative context

- 3.1 The Communications and Multimedia Act 1998 [Act 588] (“CMA”) governs the communications and multimedia industry in Malaysia and establishes the regulatory and licensing framework applicable to the industry.

Objects and national policy objectives

- 3.2 This Public Inquiry is conducted in accordance with the objects and national policy objectives of the CMA.

- 3.3 The objects of the CMA are as set out in subsection 3(1), as follows:

- (a) *to promote national policy objectives for the communications and multimedia industry;*
- (b) *to establish a licensing and regulatory framework in support of national policy objectives for the communications and multimedia industry;*
- (c) *to establish the powers and functions for the Malaysian Communications and Multimedia Commission; and*
- (d) *to establish powers and procedures for the administration of this [Communications and Multimedia] Act.*

- 3.4 The national policy objectives are as set out in subsection 3(2) of the CMA, as follows:

- (a) *to establish Malaysia as a major global centre and hub for communications and multimedia information and content services;*
- (b) *to promote a civil society where information-based services will provide the basis of continuing enhancements to quality of work and life;*
- (c) *to grow and nurture local information resources and cultural representation that facilitate the national identity and global diversity;*
- (d) *to regulate for the long-term benefit of the end user;*
- (e) *to promote a high level of consumer confidence in service delivery from the industry;*

- (f) *to ensure an equitable provision of affordable services over ubiquitous national infrastructure;*
- (g) *to create a robust applications environment for end users;*
- (h) *to facilitate the efficient allocation of resources such as skilled labour, capital, knowledge and national assets;*
- (i) *to promote the development of capabilities and skills within Malaysia's convergence industries; and*
- (j) *to ensure information security and network reliability and integrity.*

Holding of a Public Inquiry

- 3.5 This Public Inquiry is undertaken in view of the following provisions under the CMA:
- (a) Section 104: the Commission shall determine a mandatory standard if it is subject to a direction from the Minister to determine a mandatory standard in place of a voluntary industry code, which shall be in accordance with section 55 of the CMA;
 - (b) Section 55: the Commission may hold an inquiry if the matter is of significant interest to the public, current and/or prospective licensees, and shall be held in accordance with Chapter 3 of Part V of the CMA;
 - (c) Section 58 – the Commission may hold a public inquiry on any matter which relates to the administration of the CMA or its subsidiary legislations, where the Commission is satisfied that the said matter is of significant interest to the public or to the licensees;
 - (d) Section 61 – the Commission must provide notice of the terms and scope of the public inquiry and must allow members of the public to make submissions on the public inquiry which will be considered by the Commission;
 - (e) Section 63 – the Commission will not publish or disclose confidential information provided during the public inquiry process; and
 - (f) Section 65 – the Commission must publish a report within 30 days of the conclusion of a public inquiry that sets out the findings of any inquiry it conducts.

Ministerial Directions

- 3.6 The relevant directions issued by Minister referred to in subparagraph 3.5(a) above are:
- (a) Ministerial Direction on Quality of Service, Direction No. 1 of 2002; and
 - (b) Ministerial Direction on Quality of Service, Phase 2, Direction No. 3 of 2003.

4 Outputs of public inquiry process

- 4.1 The objective of this Public Inquiry is to review and enhance the existing mandatory standards on customer service for PCS, Wireless BAS and Wired BAS services. The Commission's preliminary findings are set out in this Public Inquiry Paper. Following the consultation period, the Commission will review any feedback received and then publish its conclusions and proposals in the Public Inquiry Report.

Part B Mandatory Standards for Quality of Service

1 New Mandatory Standards on Customer Service

- 1.1 The Mandatory Standards for QoS (“MSQoS”) for PCS, Wireless BAS and Wired BAS comprise of standards on network performance and customer service.
- 1.2 The network performance parameters are closely related to the evolution of technology in the ever-changing landscape of communications markets. Network parameters which were considered adequate a few years ago are no longer appropriate due technology advancements, customers’ habits and expectations. Therefore, there is a need for the Commission to respond promptly to these new developments for network performance parameters. However, the customer service parameters are less susceptible to changes in technology. As such, the Commission may not need to review customer service parameters as often as network performance parameters.
- 1.3 The Commission is also cognisant that the fixed and mobile convergence is taking place and most service providers are providing a combination of PCS, Wireless BAS and Wired BAS services. Further, the standards on customer service are similar across the three instruments, which result in similar reports being submitted to the Commission.
- 1.4 Customers generally subscribe to bundled services and when it comes to customer service standards such as complains and call handling, they often don’t make any distinction between voice, short messaging service (SMS) and broadband services.
- 1.5 Based on the above reasons, the Commission is proposing to develop a separate instrument for mandatory standards on customer service. The existing mandatory standards will be streamlined into a single instrument. The Commission believes that consolidating customer service standards into a single instrument will be a more efficient and effective way forward as it would reduce regulatory obligations for service providers and address the inconsistencies in reporting timelines. This in turn will provide a better regulatory oversight for the Commission.
- 1.6 For this new MSQoS, the Commission will focus on reviewing and setting the standards for the following new scope of customer service:
 - (a) Complaints Management;
 - (b) Customer service response;

- (c) Service fulfilment; and
- (d) Notification/information

1.7 The Commission is proposing to rephrase the indicator of the existing standards to create a common language understandable by both the customer and the service provider as per example below:

| Existing Standards | Rephrased Standards |
|---|-------------------------------------|
| Promptness in resolving customer complaints | Customer complaints resolution time |
| Promptness of answering calls to customer hotline | Call centre response time |

1.8 In addition, the Commission is proposing for new requirement where service providers are required to declare the MSQoS standards and self-report their key achievements of the standards at their website for public view.

1.9 The purpose of this new requirement is to help consumers to make choices and protect their rights as consumers and encourage service providers to improve their services to be competitive and ensure high quality of service to consumer.

1.10 The above requirement is a hybrid of the MSQoS compliance and service provider declaration/reporting.

Commission Preliminary View

1.11 The Commission is proposing a new MSQoS on Customer Service that will set out the customer service standards for PCS, Wireless BAS and Wired BAS.

Question 1

Do you agree with the Commission's proposal to develop a new Mandatory Standards for Quality of Service (Customer Service) that will streamline customer service standards for PCS, Wireless BAS and Wired BAS into a single instrument?

Question 2

What are your views on the Commission's proposal to rephrase the indicator of the existing standards to create a common language understandable by both the customer and the service provider?

Question 3

The Commission seeks views on the proposals of new requirement(s) where service providers are required to declare the MSQoS standards and self-report their key achievements of the standards for public view.

2 Standards for Quality of Service (Customer Service)

2.1 This section discusses the substantive mandatory standards for QoS that are related to customer service. Among others, this section covers critical issues such as complaint handling, service installation, activation and restoration and notification/information on scheduled maintenance and disruption.

A. Complaints Management

I. Billing Related Complaints

2.2 Billing complaints is an important component of customer service's parameter to assess the service providers' billing system and process. Service providers are required to take reasonable steps to ensure that the charging mechanism used in connection with any of its network services are accurate and reliable in all material aspects as this is a standard condition for individual and class licenses specified under paragraph 3(b) of the Communications and Multimedia (Licensing) Regulations 2000. The same is also reflective in the licences issued to the relevant licensees.

2.3 Currently, the standards for PCS, Wireless BAS and Wired BAS for billing related complaints is not more than 1% per quarter. This percentage measures the number of billing related complaints as a percentage of the total customers of each service provider.

Commission Preliminary View

2.4 Based on the compliance trend of service providers for PCS, Wireless BAS and Wired BAS from 2017 to 2019, the Commission is proposing to rephrase the standards and enhance the same by setting the billing related complaints lower to not more than **0.5%** per quarterly reporting period. This is to ensure effective action taken by service providers to reduce billing related complaints and improvement of their billing system/process.

| | | PCS | Wireless BAS | Wired BAS |
|--------------------------|------------|---|--------------|-----------|
| Present Standards | QoS | Percentage of billing related complaints must not be more than 1.0% per quarterly reporting period. | | |
| Proposed Revision | | A maximum of 0.5% billing related complaints for quarterly reporting period. | | |

Question 4

The Commission seeks views on the proposals to measure the standards on billing related complaints to be enhanced to a maximum of **0.5%** per quarterly reporting period.

II. Non-billing Related Complaints

- 2.5 Non-billing related complaints are complaints other than billing that are related to service matters and may include, but not limited to, complaints received on late or no service activation, internet speed connection, unplanned outage, unprofessional staff or contractors.
- 2.6 In the existing MSQoS on PCS, Wired and Wireless Broadband, the standards is set at the maximum number of non-billing related complaints in each quarter, which is a maximum of 6 complaints per 1,000 customers each quarter.

Commission Preliminary View

- 2.7 Similar to the billing related complaints, the Commission is proposing to rephrase the existing standards and improve the standards on non-billing related complaints to a maximum of 5 complaints per 1,000 customers for quarterly reporting period. This proposal is derived from the overall compliance trend of the service providers for PCS, Wireless BAS and Wired BAS from 2017 to 2019. In addition, the Commission wants to ensure that service providers continuously strive to improve their services to customers.

| | | PCS | Wireless BAS | Wired BAS |
|--------------------------|------------|--|--------------|-----------|
| Present Standards | QoS | Non-billing related complaints must not be more than 6.0 complaints per 1,000 customers per quarterly reporting period | | |
| Proposed Revision | | A maximum of 5.0 non-billing related complaints per 1,000 subscriptions for quarterly reporting period | | |

Question 5

The Commission seeks views on the proposals to measure the standards on non-billing related complaints to be enhanced to a maximum of **5.0 per 1,000 subscriptions** for quarterly reporting period.

B. Customer Service Response

I. Customer Complaints Resolution Time

- 2.8 This indicator measures the percentage of complaints resolved by service providers within the timelines specified in the MSQoS. The existing standards in all 3 MSQoS require service providers to resolve at least 60% of complaints within 3 business days, at least 90% within 5 business days and 95% within 15 business days. The resolution timelines are applicable to both billing and non-billing related complaints. These complaint resolution standards are measured on a quarterly basis.
- 2.9 In computing complaints resolution timelines, complaints that are unresolved due to certain extenuating factors are excluded. The factors that are considered by the Commission are as follows:
- (a) Damage to network facility due to force majeure or third parties;
 - (b) Faulty Customer Premises Equipment (CPE), customer infrastructure or internal wiring; and
 - (c) Customer premises inaccessible.

Commission Preliminary View

- 2.10 As with other standards on complaints, the Commission is proposing to rephrase the standards to Customer Complaints Resolution Time for billing related complaints, non-billing related complaints and add new indicator for network related complaints. The network related complaints refer to complaints on poor or no coverage. Service providers are required to provide their improvement plans including timelines to the complainant unless the area fulfills the underserved area definition specified under the Communications and Multimedia (Universal Service Provision) Regulations 2002.
- 2.11 In addition, the Commission is proposing to substitute the term 'resolved' to 'closed' for complaints. The definition of the term 'closed' for complaints is the complainant consented to the resolution of the complaint provided by the service provider and

agreed to close the complaint. This is to address consumer issues of complaints 'resolved' but not satisfactorily addressed by service providers or misinterpretation of the term 'resolved'.

2.12 The Commission is also proposing for the complaints handling standards to be revised from 3 tiers to 2 tiers, and the complaint resolution timeline is shorten where 80% of complaints are to be closed within 3 business days and 95% of complaints are to be closed within 10 business days for billing related complaints and 70% of complaints are to be closed within 3 business days and 90% of complaints are to be closed within 10 business days.

2.13 The Commission wants to ensure that service providers are able to measure the overall effectiveness of complaints resolution and continuously strive to improve their complaints resolution.

| | PCS | Wireless BAS | Wired BAS |
|------------------------------|---|--------------|-----------|
| Present QoS Standards | <p>The standards on promptness in resolving customer complaints, separately measured for billing related complaints and non-billing related complaints, for every quarterly reporting period is:</p> <ul style="list-style-type: none"> a) Not less than 60.0% must be resolved within 3 business days; b) Not less than 90.0% must be resolved within 5 business days; and c) Not less than 95.0% must be resolved within 15 business days | | |
| Proposed Revision | <p>The standards on customer complaint resolution time, for every quarterly reporting period is:</p> <p>Billing Related Complaints</p> <ul style="list-style-type: none"> a) Not less than 80.0% must be closed within 3 business days; and b) Not less than 95.0% must be closed within 10 business days. <p>Non Billing Related Complaints</p> <ul style="list-style-type: none"> a) Not less than 70.0% must be closed within 3 business days; and b) Not less than 90.0% must be closed within 10 business days. <p>Network Related Complaints</p> <ul style="list-style-type: none"> (a) For network complaints related to poor or no coverage, service providers must provide their improvement plans including timelines to the complainant unless the area fulfills the underserved area definition specified under the Communications and Multimedia (Universal Service Provision) Regulations 2002. (b) Service providers are bound to the plan provided and the Commission may issue direction(s) as may be required to compel performance in accordance to the said plan. | | |

Question 6

The Commission seeks views on the proposals to measure the resolution timeline of:

- a) **80%** of complaints are to be closed within **3 business days** and **95%** of complaints are to be closed within **10 business days** for billing related complaints for quarterly reporting period.
- b) **70%** of complaints are to be closed within **3 business days** and **90%** of complaints are to be closed within **10 business days** for non-billing related complaints for quarterly reporting period.

Question 7

What are your views on the Commission's proposal to add new indicator(s) for network complaints related to poor or no coverage and the requirement for the service provider to provide its improvement plans including timelines to the complainant?

Question 8

Do you agree with the Commission's proposal to substitute the term 'resolved' with 'closed' for complaint resolution?

Question 9

The Commission seeks views on the proposed definition of complaint 'closed'?

II. Call Centre Response Time

- 2.14 Promptness in answering calls to customer hotline measures the time when a customer presses the button opting for a human operator, to the time it is answered by a human operator. In this respect, the duration when the call is attended by the interactive voice response system (IVRS) before being transferred to a human operator is excluded. The promptness in answering calls to customer hotline is currently measured on a quarterly basis.
- 2.15 The current standards across all 3 MSQoS that are being reviewed is 80% of calls to customer hotline that opted for human operator must be answered within 20 seconds, while 90% must be answered within 40 seconds.

Commission Preliminary View

- 2.16 The Commission is cognisant that due to advancement in technology, a lot of calls to customer hotlines are handled by IVRS. However, there are certain customers who opt for human operator

and it is critical that these calls are answered promptly. Therefore, the Commission is proposing to rephrase the existing standards to Call Centre Response Time, amend from 2 tiers to 1 tier and enhance the level of answering calls by adopting the mid points and set at least 85% calls to be answered within 30 seconds.

| | | PCS | Wireless BAS | Wired BAS |
|--------------------------|------------|--|--------------|-----------|
| Present Standards | QoS | At least 80.0% of calls to customer hotline that opted for human operator in a quarterly reporting period must be answered within 20 seconds. | | |
| | | At least 90.0% of calls to customer hotline that opted for human operator in a quarterly reporting period must be answered within 40 seconds. | | |
| Proposed Revision | | At least 85.0% of calls to customer hotline that opted for human operator in a quarterly reporting period must be answered within 30 seconds . | | |

Question 10

What are your views on the Commission's proposal to revise the standards from 2 tiers to 1 tier and to revise the standards on Promptness in Answering Calls to Customer Hotline to **85%** of calls that opted for human operator in a quarterly reporting period must be answered within **30 seconds**?

C. Service Fulfilment

I. Service Restoration Fulfilment

- 2.17 Service restoration fulfilment is only applicable to Wired BAS services. This is due to the fact that service restoration for Wired BAS services may require service providers to visit their customer's premises in order to restore the services.
- 2.18 In the current MSQoS on Wired BAS service, at least 95% of services are required to be restored within 24 hours from the time and date a service fault has been reported, while 100% must be restored within 48 hours, including non-business day. However, the inability to restore services due to the following factors is excluded from computation of percentage of service restoration fulfilment:
- (a) Damage to network facility due to force majeure or third parties;

- (b) Faulty Customer Premises Equipment (CPE), customer infrastructure or internal wiring; and
- (c) Customer premises inaccessible.

2.19 If the customer has requested for a specific time and date of service restoration, the restoration date is calculated from the specified time and date, including non-business days.

Commission Preliminary View

2.20 The Commission is of the view that the existing timelines are reasonable and should be maintained. However, the standards are refined to provide further clarity.

| Wired BAS | |
|------------------------------|--|
| Present QoS Standards | <p>Not less than 95.0% of all Service Restoration Fulfilment in a reporting period must be fulfilled within 24 hours; and</p> <p>100.0% of all Service Restoration Fulfilment in a reporting period to be fulfilled within 48 hours</p> |
| Proposed Revision | <p>Not less than 95.0% of all Service Restoration Fulfilment in a reporting period must be fulfilled within 24 hours from the time and date a service fault is reported; and</p> <p>100.0% of all Service Restoration Fulfilment in a reporting period to be fulfilled within 48 hours from the time and date a service fault is reported (for quarterly reporting period applicable for Wired BAS only)</p> |

Question 11

The Commission seeks views on the proposed revision to Service Restoration Fulfilment to provide further clarity.

II. Service Activation Fulfilment

2.21 Similar to service restoration, service activation fulfilment is only applicable to Wired BAS due to the nature of the service that requires service providers to contact the customers to make an appointment and subsequently visit the customers' premises to carry out wiring and installation of the necessary equipment prior to activating the service.

2.22 In the current MSQoS on BAS, the timeline for service activation is specified from the date and time that has been agreed by the

customer for the service to be activated, to the time when the service is activated, excluding non-business days. Service providers are required to ensure that at least 95% of services in a reporting period are activated within 24 hours from the agreed date and time, while 100% of services are activated within 72 hours.

Commission Preliminary View

2.23 The Commission is of the view that the existing timelines in the MSQoS on service activation are reasonable and should be maintained.

| Wired BAS | |
|------------------------------|--|
| Present QoS Standards | Not less than 95.0% of all Service Activation Fulfilment in a reporting period must be fulfilled within 24 hours from the agreed time and date; and 100.0% of all Service Activations Fulfilment in a reporting period must be fulfilled within 72 hours from the agreed time and date. |
| Proposed Revision | The present standards to be retained |

D. Notification / Information

I. Advance Notice of Scheduled Downtime

2.24 In the MSQoS on PCS, Wired BAS and Wireless BAS, advance notice on scheduled downtime is specified under network performance standards. While we acknowledge that service downtime is due to disruption in network performance, managing customers’ expectation, communicating the scheduled downtime to customers and the resulting compensation, if any, are critical elements of customer service. Therefore, the Commission is of the view that it is more appropriate for the 2 standards on scheduled downtime and service disruption to be included in the new MSQoS on Customer Service.

2.25 In addition, there are inconsistencies on the obligation for service providers to notify the Commission of the scheduled downtime. In the MSQoS on PCS, service providers are required to notify the Commission in writing 72 hours in advance, while in the MSQoS on Wired BAS and Wireless BAS, there is no such requirement to notify the Commission.

Commission Preliminary View

2.26 It is imperative for the Commission to have the notice of a scheduled downtime in order to manage stakeholders. As such, the Commission is proposing to impose the existing requirement in

the MSQoS on PCS whereby service providers are required to provide 72 hours' advance notification to the Commission.

| | PCS | Wireless BAS | Wired BAS |
|------------------------------|---|--|------------------|
| Present QoS Standards | <p>Every session of scheduled downtime due to occur in a quarterly reporting period must be notified to customers not less than 24 hours in advance; and</p> <p>Every session of scheduled downtime due to occur in a quarterly reporting period must be notified to the Commission in writing not less than 72 hours in advance.</p> | <p>Every session of scheduled downtime due to occur which affects customers must be notified to customers not less than 24 hours in advance.</p> | |
| Proposed Revision | <p>Every session of scheduled downtime which affects customers must be notified to customer not less than 24 hours in advance.</p> <p>Every session of scheduled downtime in the reporting period must be notified to the Commission in writing not less than 72 hours in advance.</p> | | |

Question 12

Do you agree with the Commission's proposal to impose a requirement that for every scheduled downtime for PCS, Wireless BAS and Wired BAS, service providers must notify the Commission in writing **72 hours in advance**?

II. Notification on Unplanned Service Disruption

- 2.27 Service disruption refers to unplanned disruption of the services that a customer subscribes to. There are requirements in all 3 MSQoS on PCS, Wireless BAS and Wired BAS for the service providers to notify the Commission in the event of service disruptions. However, in the MSQoS on PCS and Wireless BAS, these notifications are only required when disruptions are due to certain network elements. For example, for PCS services, notification is required if the service disruption is due to Mobile Switching Centre (MSC). On the other hand, for Wireless BAS, notification is required if the service disruption is due to Serving GPRS Support Node (SGSN), Mobile Management Entity (MME) or Access Service Network Gateway (ASN GW). If service

disruptions are due to other network elements or other reasons such as natural disasters or fire, there is currently no requirement for notification to the Commission.

2.28 Alternatively, in the MSQoS on Wired BAS, the requirement for notification to the Commission is based on the duration of service disruption, i.e. 3 hours or more and if the number of customers affected are 500 or more.

2.29 In all 3 MSQoS, there is also a requirement to submit a comprehensive report within 7 business days of the occurrence of the service disruption.

Commission Preliminary View

2.30 As a regulatory body, the Commission is accountable to various stakeholders such as consumers, industry and the Government. As such, it is critical for the Commission to be aware of service disruptions in order to manage stakeholders effectively. Therefore, the Commission is proposing to make several changes. Firstly, service providers are required to notify the Commission and customers of **every incident** of service disruption within 60 minutes from the occurrence.

2.31 Secondly, the Commission is proposing to set similar standards across all 3 MSQoS that are based on the length of the service disruption and the number of subscribers affected. This is to ensure that service providers take prompt action to restore services, failing which, the Commission may initiate regulatory action against service providers.

2.32 Thirdly, for each incident of service disruption that lasted more than 4 hours and affected the specified number of customers as per the stated parameter for Service Disruption, service providers are required to submit a comprehensive report within 5 business days instead of 7 business days that were specified previously.

| | PCS | Wireless BAS | Wired BAS |
|------------------------------|--|--|--|
| Present QoS Standards | Any Mobile Switching Centre (MSC) must not be out of service for 30 minutes or longer. Service provider must notify the Commission within 60 minutes of any single service disruption incident that involves a Mobile Switching | Any single Service Disruption incident that involves a SGSN, MME or ASN GW being out of service: (a) between 5AM to 12 midnight, must be rectified within 60 minutes from the occurrence of the | Any single incident of Service Disruption must not be out of service for 3 hours or longer and affect 500 or more customers. Any single incident of Service Disruption that affects 500 or more customers and lasts for 3 hours or longer which occurs: |

| | PCS | Wireless BAS | Wired BAS |
|---------------------------|---|--|---|
| | <p>Centre (MSC) being out of service for any duration.</p> <p>Service provider must submit a comprehensive report to the Commission within 7 business days of the occurrence of any single service disruption incident that involves a Mobile Switching Centre (MSC) being out of service for 30 minutes or longer.</p> | <p>Service Disruption; and</p> <p>(b) between 12 midnight to 5AM, must be rectified no later than 6AM.</p> <p>Service provider must notify the Commission within 60 minutes of any single service disruption incident that involves a SGSN, MME or ASN GW being out of service.</p> <p>Service provider must submit a comprehensive report to the Commission within 7 business days of the occurrence of any single service disruption incident that involves a SGSN, MME or ASN GW being out of service for the specified duration and affecting customers.</p> | <p>(a) between 5AM to 12 midnight, must be rectified within 3 hours from the occurrence of the Service Disruption; and</p> <p>(b) between 12 midnight to 5AM, must be rectified no later than 6AM.</p> <p>The service provider must notify customers within 90 minutes of the occurrence of any single Service Disruption incident affecting 500 or more customers and lasts for 3 hours or longer.</p> <p>Service provider must submit a comprehensive report to the Commission within 7 business days of the occurrence of any single Service Disruption incident that affected 500 or more customers and lasted for 3 hours or longer.</p> |
| Proposed Revisions | <p>Service providers shall notify the Commission and customers within 60 minutes from the occurrence of any single Service Disruption incident (including the exclusions).</p> | | |

| | PCS | Wireless BAS | Wired BAS |
|--|---|--------------|--|
| | <p>Any single incident of Service Disruption (except for fault due to 3rd party, other service providers or force majeure) must not be out of service for more than 4 hours; and;</p> <ul style="list-style-type: none"> • affected more than 100,000 customers; or • affected more than 10 percent of the customers or 10,000 whichever is higher for service provider with less than 1 million customers. | | <p>Any single incident of Service Disruption (except for fault due to 3rd party, other service providers or force majeure) must not be out of service for more than 4 hours and affected 2,000 or more customers.</p> |
| | <p>The service provider must submit a comprehensive report to the Commission within 5 business days of the occurrence of any single service disruption incident that lasted more than 4 hours and affected the specified number of customers as per the stated parameter for Service Disruption.</p> | | |

Question 13

Do you agree with the Commission's proposal to impose an obligation on service providers to notify the customers and Commission within 60 minutes of each incident of service disruption?

Question 14

The Commission seeks views on the proposal to have similar standards for service disruption that are based on the length duration of the disruption and the number of subscribers affected by the disruption.

Question 15

Respondents are invited to provide feedback on the proposed timeline of 5 business days to submit a comprehensive report to the Commission on the service disruption.

iii. Compensation Policy

Commission Preliminary View

- 2.33 Recognizing the importance of various issues faced by customers during unplanned service disruptions such as unable to contact family members, not able to use online services, loss of income for e-hailing riders and etc, the Commission is proposing for service providers to establish a compensation policy or plan that can compensate affected customers due to network outages or breach of proposed standards for service disruption. Service providers will need to declare the type of compensation (money or money's worth) including requirement to publish its compensation policy as well as the process of how to apply for the compensation to the customer.

Question 16

The Commission seeks views on the proposal for service providers to establish a compensation policy or plan to compensate affected customers due to network outages or breach of proposed standard for service disruption and the requirement to publish the compensation policy and process.

3 Reporting Timeline and Interpretation of the Standards

- 3.1 This section will address the reporting timeline, as well as proposed changes to the definitions in the mandatory standards.

A) Reporting Obligations

- 3.2 The compliance of service providers with the MSQoS is assessed based on reports that are submitted on a periodic basis. The reporting obligations in the MSQoS for Wireless BAS are on a half yearly basis, while the obligations in the MSQoS for PCS and Wired BAS are on a quarterly basis. This means that a service provider who is providing more than one service would have to submit reports based on different reporting timelines for different services.

Commission Preliminary View

- 3.3 The Commission is proposing to standardise the reporting timelines to ease the reporting obligations for service providers as well as provide ample time for service providers to implement action and monitor service improvement. For all 3 services, the Commission is proposing a reporting obligation on a quarterly basis.

Question 17

Do you agree with the Commission's proposal on quarterly reporting obligations for PCS, Wired BAS and Wireless BAS?

B) Definition of Subscriptions

- 3.4 In order to be consistent with the terms used by ITU World Telecommunication/ICT indicator, the Commission is proposing to substitute the term '**Customers**' in MSQoS for PCS, Wireless BAS and Wired BAS with '**Subscriptions**'.

Commission Preliminary View

- 3.5 The Commission is proposing a new definition for the term 'subscriptions' in these standards as follows:

"Subscriptions means the number of active subscriptions to Public Cellular Service and/or Wired Broadband Service and/or Wireless Broadband Service at the end of the reporting period".

Question 18

Do you agree with the Commission's proposal to substitute the term 'customers' with 'subscriptions'?

Question 19

The Commission seeks views on the proposed definition of the term 'subscriptions'.

Annexure 1

Summary of questions

- Question 1** Do you agree with the Commission's proposal to develop a new Mandatory Standards for Quality of Service (Customer Service) that will streamline customer service standards for PCS, Wireless BAS and Wired BAS into a single instrument?
- Question 2** What are your views on the Commission's proposal to rephrase the indicator of the standards to create a common language understandable by both the customer and the service provider?
- Question 3** The Commission seeks views on the proposals of new requirement(s) where service providers are required to declare the MSQoS standards and self-report their key achievements of the standards for public view.
- Question 4** The Commission seeks views on the proposals to measure the standards on billing related complaints to be enhanced to a maximum of 0.5% per quarterly reporting period.
- Question 5** The Commission seeks views on the proposals to measure the standards on non-billing related complaints to be enhanced to a maximum of **5.0 per 1,000 subscriptions** for quarterly reporting period.
- Question 6** The Commission seeks views on the proposals to measure the resolution timeline of:
- a) **80%** of complaints are to be closed within **3 business days** and **95%** of complaints are to be closed within **10 business days** for billing related complaints for quarterly reporting period;
 - b) **70%** of complaints are to be closed within **3 business days** and **90%** of complaints are to be closed within **10 business days** for non-billing related complaints for quarterly reporting period.
- Question 7** What are your views on the Commission's proposal to add new indicator(s) for network complaints related to poor or no coverage and the requirement for the service provider to provide its improvement plans including timelines to the complainant?

- Question 8** Do you agree with the Commission's proposal to substitute the term 'resolved' with 'closed' for complaint?
- Question 9** The Commission seeks views on the proposed definition of the term complaint 'closed'?
- Question 10** What are your views on the Commission's proposal to revise the standards from 2 tiers to 1 tier and to revise the standard on Promptness in Answering Calls to Customer Hotline to **85%** of calls that opted for human operator in a quarterly reporting period must be answered within **30 seconds**?
- Question 11** The Commission seeks views on the proposed revision to Service Restoration Fulfilment to provide further clarity.
- Question 12** Do you agree with the Commission's proposal to impose a requirement that for every scheduled downtime for PCS, Wireless BAS and Wired BAS, service providers must notify the Commission in writing **72 hours in advance**?
- Question 13** Do you agree with the Commission's proposal to impose an obligation on service providers to notify the customer and Commission within 60 minutes of each incident of service disruption?
- Question 14** The Commission seeks views on the proposal to have similar standards for service disruption that are based on the length duration of the disruption and the number of subscribers affected by the disruption.
- Question 15** Respondents are invited to provide feedback on the proposed timeline of 5 business days to submit a comprehensive report to the Commission on the service disruption.
- Question 16** The Commission seeks views on the proposal for service providers to establish a compensation policy or plan to compensate affected customers due to network outages or breach of proposed standard for service disruption and the requirement to publish the compensation policy and process.
- Question 17** Do you agree with the Commission's proposal on quarterly reporting obligations for PCS, Wired BAS and Wireless BAS?
- Question 18** Do you agree with the Commission's proposal to substitute the term 'customers' with 'subscriptions'?

Question 19 The Commission seeks views on the proposed definition of the term 'subscriptions'.