Report on education program on telecom consumers' rights Manipur, 2018-19

By Chinmayi S K and Rohini Lakshané[1]

29 November 2021

---

[1] In alphabetical order.

Introduction

This report presents the highlights from a year-long education program for women telecom consumers conducted by the The Bachchao Project in Manipur from December 2018 to August 2019. This program was made possible with support from Internews.

Rohini Lakshané, the erstwhile Director (Emerging Research) at The Bachchao Project, ideated and designed the foundational aspects and activities of the project. The program and the execution after December 2018 was primarily supported by Chinmayi SK with help from Tania Devaiah and Rohini Lakshané on specific tasks.

Why was the program conceived?

Some of the findings from our 2018 exploratory study entitled "**Of Sieges and Shutdowns**" showed that:
- The state of Manipur experiences poor and unreliable telecom connectivity.
- The respondents had low awareness of their rights as telecom consumers.
- Many respondents stated that beyond the preliminary step of calling or emailing the customer care helpline to file a complaint they had no knowledge of how to seek redress for their issues as consumers of telecom services.
- Some respondents had never considered filing a preliminary complaint with their telecom company.
- The respondents stated that the complaints that they lodged with the telecom companies were often not resolved to their satisfaction.

[Refer to Page 26 "Consumer relief for low QoS [quality of service]" and "Section 5: State of Network Coverage in Manipur"]

Thus, the first step towards building capacity for digital rights advocacy in the region was to educate the people that access to the Internet is their right and the barriers to access need to be tackled at different levels, ranging from the telecom service providers to the telecom regulator and industry bodies to government policy. There was no organised movement or group of consumers in the region to take up such advocacy and outreach. Because the awareness of digital rights is abysmal, most people think of it not as a policy issue but as an issue of the end-consumer.

The telecom industry in Manipur is the only organised private sector industry in the state. It is difficult for telecom service providers to operate there and keep the business viable, because of the prevalent situation (challenging terrain, a lack or scarcity of supporting infrastructure, shortage of electric power, armed insurgency, *et cetera*). Additionally, some studies have shown that different telecom companies across the country misrepresent the figures about their QoS (quality of service) to the national telecom regulator, the TRAI. The government bundles together the publicly available data of six northeastern states for all metrics, making the datasets unusable for the purpose of determining QoS in each state or district. This, in turn, means that there is no verifiable data on which research and advocacy efforts can be based, unless consumers are able to run technical tests and gather their own credible, meaningful and comprehensive datasets. All these factors make it difficult for the local people to advocate for policy change with the government.

Another gap we identified during our exploratory study was that the reference materials and information relevant to telecom consumer's issues curriculum was mostly available in

English, and not in Meiteilon and other local languages of Manipur. English is not particularly useful for public mobilisation, especially in rural communities.

Some of the overarching solutions to address these issues are:

(a) Direct interventions between the telecom companies and their subscribers. (For example, people living in areas with low network coverage could offer their premises for erecting new mobile towers.)

(b) Raising awareness for the need of alternative infrastructure where the conventional telecom industry cannot fulfill the local demand or does not exist at all.

(c) Building capacity to advocate for:

- the publishing of public data for the state in usable forms and in accordance with the government's open data policy and Digital India programme.
- policies that will ultimately lead to the improvement in Internet penetration and mobile network coverage in the state.

(d) Capacity building to enable the local population to approach the consumer forum and other judicial or statutory bodies to seek redress for their issues.

(e) Translation of reference and outreach materials for consumer education and awareness to Meiteilon and other local languages.

We thus decided to embark on a continuing consumer education program that enables the above solutions.

Objectives of the program

- To support the creation of resources and learning material for consumer awareness, education and advocacy from the perspective of women and gender-diverse telecom consumers in Manipur and for improving digital access and its quality.
- To make such resources and learning material available in local languages.
- To build capacity to seek redressal for the issues of poor and unreliable network connectivity in their respective districts.
- To enable the local population to conduct surveys and use credible and verifiable data for advocacy.

Program activities

Training of trainers

The Bachchao Project conducted two workshops for the training of trainers under this program. The first was a two-day inception workshop to lay the foundation for a long-term program and to identify women and gender-diverse persons from local communities who would be interested in spearheading the program. The second was a four-day workshop for civil society organisations on planning and organising activities for outreach and awareness.

Inception workshop

The inception workshop was conducted on December 4 and 5, 2018 in Imphal, Manipur with 20 participants. Rohini Lakshané, the erstwhile Director (Emerging Research) at The Bachchao Project designed and facilitated the workshop and created its curriculum.

Curriculum

The curriculum largely comprises basic concepts, terminologies, some public policy aspects relevant to telecom consumers, and activities to identify problems and/ or gaps and address them.

- What is a public good?
- The Internet as a public good
- Access to the Internet as a fundamental human right
- Fundamentals of:
  - spectrum licensing in India
  - telecom regulation in India
  - quality of service (QoS)
- The concept of telecom circles
- Government agencies and departments responsible for consumer issues.
- The different steps for filing and escalating consumer complaints with various entities.
- Legal relief through quasi-judicial consumer courts (called "consumer forums" in India).
  - The process for filing a complaint at consumer forums.
- Official sources where telecom data relevant to Manipur is available and why they are unusable.
- Government initiatives for promoting Internet-dependent services (such as Digital India, Digital Northeast, and cashless economy)
- The current status of consumer forums and state-run consumer dispute resolution bodies in Manipur
- Temporary Suspension of Telecom Services (Public Emergency or Public Safety) Rules, 2017.
- An example of a telecom policy intervention by a consumer organisation in India
- References and further reading

Workshop design

On the first day of the workshop, the facilitator introduced the participants to theoretical topics in the curriculum. Other matters that were covered:
- What can we do for consumer relief and how?
- Basics to know before advocating for better services
  - What is quality of service (QoS)?
  - What is the TRAI?
  - How do the government and mobile companies provide us mobile phone and mobile Internet services?
  - What are telecom circles?
  - How many telecom circles are there in India?
  - Why can't there be one telecom circle for all of India?
  - What telecom circle does Manipur fall in?
  - Why should we care about spectrum licensing, telecom circles, or what telecom circle Manipur falls in? Isn't the telecom circle a purely administrative concept?
  - Apart from the TRAI, what government bodies within Manipur and outside it are relevant to the issues of telecom consumers?

- ○ What information is publicly available about the quality of networks in Manipur?
- ○ Steps for filing a consumer complaint and escalating it, if necessary
- ○ Seeking information about consumer action

The use of "broadband labels", an intervention proposed by Consumer Unity and Trust Society (CUTS) India, was presented as an example of a consumer intervention at the policy level.

CUTS India video on broadband labeling with voiceover in India: https://www.youtube.com/watch?v=7m4aK4LuPBw

Handout 1: Labels for empowering consumers
http://cuts-ccier.org/broadbandlabel/pdf/Brochure-Information_Labels_for_Consumers.pdf
Handout 2:
http://cuts-ccier.org/broadbandlabel/pdf/Brochure-Consumer_Broadband_Labels.pdf

On the second day we discussed the specific problems the participants face with reference to access, reliability, affordability and quality of Internet and telecom services. We introduced the participants to the kinds of legal, non-legal, policy, outreach and public awareness interventions that are possible and practicable in their case.

Group work: Subsequently, the participants were asked to do an exercise to identify their most pressing needs as telecom consumers. Through an iterative process, the participants and the facilitator grouped together similar needs and distilled them into actionable solutions. Further, we identified three different goals:
- Bridging grid power shortfall at base transceiver stations (BTS), that is, mobile towers.
- To receive higher speeds of data and QoS
- Consumer mobilisation

The facilitator split participants into three groups and they worked together to draw up a plan of action to meet these goals. Each group presented their plan of action in the workshop. The facilitator and members of the other two groups provided their comments and feedback to the plan.

Outcome

- **Implementation:** WinG subsequently worked on improving, revising and implementing the three plans of action made during the workshop.
- **Building capacity and awareness:** Most of the participants stated that their immediate step would be to educate their own communities about telecom consumers' rights, so that they could locally build the capacity to collectively assert their rights as telecom consumers.
- **Fund-raising:** The participant group stated that they need to raise funds to be able to initiate and sustain such a consumer education and awareness programme in their respective districts and communities.

Contributors

Logistics were handled by Raashi Saxena, the erstwhile Community Partnerships Manager at The Bachchao Project, and Chanchal Kumari of Women in Governance (WinG), the local partner organisation. Abhinav Garule, a volunteer, wrote English subtitles for the CUTS India video on broadband labelling. The voiceover of the video is in Hindi.

Participant profile

- All participants identified themselves as women.
- The participants were employed with different civil society organisations based in the state. These organisations mainly work in the field of child rights, women's rights and gender-based violence, environmental protection and human rights. There is no organisation or group in the state that works on consumer rights.
- The participant group included a mix of people residing in rural locations and urban ones and in different districts of Manipur. This diversity was crucial for us in selecting the participants as telecom access issues and their potential solutions vary vastly across the state. [*Refer to Of Sieges and Shutdowns, "Consumer relief for low QoS", p. 26]*
- All participants were entrepreneurs and/ or employed in NGOs.
- Participants were selected based on a combination of criteria: Their willingness/ eagerness to learn about these issues and to direct their efforts towards resolving them; passing on their learning and, in turn, training other people in their community; familiarity with the Internet and the English language and a desire to continue advocacy efforts in the direction of securing reliable access to ICTs.

Training programme on planning projects and outreach

The residential training was held in April 2019 for four days. The objective of the training was to share knowledge on effectively reaching out to and educating communities on consumer rights. Tania Devaiah, a member of The Bachchao Project (TBP) was the trainer for the full duration of the program. She is an experienced campaigner. She trained the participants on how to effectively build and execute a campaign based on a clearly defined Theory of Change.

Curriculum

- Understanding the lifecycle of a campaign and Theory of Change that guides it
- Learning best use of available resources to maximize impact of tactics used
- Mapping of stakeholders
- Planning and strategic thinking for education and outreach programs
- How to design social media and other communications for outreach

Design

The participants of this training were chosen from the consumer rights workshop held in December 2018. The participants had been tasked with the responsibility of identifying the needs of their communities and creating a training programme that would benefit them. The program was designed to help the participants work hands-on their plans. Each participant started with what the issue of internet access meant to them and their communities. They outlined the challenges they face with respect to access to the internet. Based on the challenges and the needs of their communities, the participants proposed one goal they wanted to achieve with and for their communities.

The trainer put together a series of exercises for the participants to build their campaigns to achieve their defined goal.This included an examination of feasibility, mapping of stakeholders (which included identifying partners, allies, and other support systems and the challenges involved in doing so). The participants then went through the process of building

their entire campaign from the overall strategy to the numerous steps they could undertake to execute the same.

This helped the participants go back to their communities to draft a budget required for them to carry out these proposed activities.

Outcome

The participants submitted a detailed plan of their projects to TBP in May 2019.

Contributors

Logistics were handled by Chinmayi S K of The Bachchao Project and Chanchal Kumari of Women in Governance (WinG), the local partner organisation.

Participant profile

The participants were potential campaign organisers selected from the participants of the consumer rights workshop held in December 2018.
- The participants self-identified as women
- The participants were employed with civil society organisations based in the state.
- All the participants worked in rural locations and in different districts of Manipur and belonged to different communities.
- The participants were chosen based on their availability and skills to do training on issues of consumer rights.

Research and outreach

This effort on consumer rights education was initially based on the findings of our research report "Of Sieges and Shutdowns". Our research, though comprehensive, quickly recognised that it was important for local actors to explore this with their own lens. To do this we supported three women, one from the Meitei community, another from the Naga community, and the third from the Kuki community to look at the needs of their communities and districts. They were trained on simple research methods to support their exploration of this topic. As a result, the three coordinators proposed the following three activities.

Representation to the state owned BSNL for better quality of service in a district southeast of the capital city of Imphal. The community that the coordinator represented lives in a village with only a BSNL network. A mobile tower is situated in the village but is hardly maintained. The coordinator met with representatives of the state-run telecommunications company BSNL in person to put forth their demand for better quality of service. She held a consultation with the leaders of her community in July 2019. The coordinator continued to engage with BSNL officials on this matter thereafter.

Baseline survey of the usage of various mobile and broadband networks in another district southeast of Imphal. It is a major district on the India-Myanmar border and has various active mobile network services. The town area of the district has good mobile bandwidth and coverage, both of which reduce as one moves away from it. As the first step towards engaging with the issues of access to the Internet and mobile connectivity the coordinator conducted a baseline survey to understand the user base. She used random sampling to

determine the residents' patterns of usage of mobile networks and Internet. In this survey she also recorded the issues they face while using these services. The survey found that majority of the users used Vodafone, Jio and Airtel while BSNL was the least used network. Airtel and Vodafone services deteriorated when one moved away from the town centre. A future course of action is yet to be determined.

<u>Survey of BSNL users in a large but remote district southwest of Imphal</u>. Cyber cafes and Internet-dependent businesses in the district primarily use BSNL. So the coordinator decided to focus on the experience of BSNL users in the district. She conducted the study using a survey to capture the challenges in the words of the users and through the testing of networks via OOKLA Speed Test and the TRAI's bandwidth-measuring applications.

The coordinator shared the following findings from their effort:
- The survey consisted of 80% respondents who used BSNL for business while the remaining 20% used BSNL for their personal or home use.
- The majority of the survey respondents expressed their dissatisfaction over the data speed. Some of the respondents complained about the sudden drop in speed and uncertainty of network connectivity.
- Of the respondents who used BSNL for commercial purposes, 24% did not wish to continue using BSNL Broadband. Instead, they preferred to switch to other telecom operators such as Reliance Jio and Airtel.
- The remaining respondents wanted to continue using BSNL Broadband connections but hoped their speeds would improve over time. The survey respondents also showed a lack of awareness about addressing their concerns and problems. The majority of the respondents did not know who to approach for solving their issues or what the process to get their complaints addressed was.
- The speed tests also indicated that data speeds were below those mentioned in the network's tariff plans.

Based on the results of this survey, the coordinator concluded that the best course of action was to convene a meeting of users with BSNL officials in the district for the users to voice their grievances and identify possible solutions. However, the meeting did not materialise on account of several factors.

Subsequent programs

The three coordinators subsequently worked with our partner organisation WinG to host consumer awareness workshops for leaders of civil society organisations (CSOs) in the state. WinG obtained a separate grant from Internews to host workshops and training sessions for women CSO leaders to learn about the terminology around mobile networks, and the process to file complaints and escalate complaints, if necessary. Parts of the curriculum for the training of trainers (December 2018) were used for these workshops, which were held in mid-2019. Chinmayi S K from The Bachchao Project supported these subsequent programs by being a resource person for the events.

Lessons and challenges

Lack of funding for long term activities: A long term program is necessary if the consumers are to learn how to engage in filing complaints and following up. Our initial research indicated that most of the respondents did not know how to engage with service providers and regulators, or that such an engagement was possible. During subsequent programs that were hosted by our partners, they were able to engage with over 60 CSOs in the region and talk about the issues of access to the internet. But future actions did not materialise from these conversations or meetings because of lack of funds for these activities.

Capacity for project-planning and budgeting: In our effort we found it easy to train the trainers around concepts, terminology and processes. We faced a lot of challenges in getting the trainers to plan project activities and budget for them. We found that only a few persons in the trainee groups possessed these skills. There is a necessity for building capacity around these skills with young leadership for any program to be successful.

Lack of a consumer rights ecosystem: India has never witnessed a strong movement for consumer rights. While some consumer rights groups and civil society organisations exist in the country, we did not find any in Manipur. Thus, we were required to start the consumer education program from scratch. On the level of public policy, we did not come across any significant efforts to develop or influence telecom policy in the context of Manipur, or northeastern India in general. The region has some requirements that are unique and different from what is called "mainland India". The perception that only persons with professional and academic credentials in the field of technology are capable of telecom consumer rights activism or engaging in telecom policy issues also hinders public participation.