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भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

BSNL 3G))) BSNL LIVE

To
The Advisor (CA&QoS)
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg, (Minto Road),
New Delhi-110002

No. 1-13/2012-Regln/ 719

dated: 19th May, 2014

{Kind attention: Sh. A. Robert J. Ravi}

Sir,

Sub: - Comments on Amendment to "Standard of Quality of Service for Mobile Data Service Regulation, 2012"

Kindly refer to your office Press release No. 20/2014 and Consultation paper No.3/2014 dated 21st April, 2014 on the subject cited above vide which TRAI has sought the comments from BSNL. In this context, the point wise comments of BSNL are as follows:

Question 1: What are your views on prescribing benchmarks for minimum download speed as above? Please give your comments with justification.

The data traffic primarily is of statistical, bursty nature meaning thereby that to predict precisely the nature, volume and requirement of data for a customer at any given point of time is very difficult. Furthermore, the traffic is of bursty nature, at any given point of time, the customer might be downloading at a very high speed and immediately after that he/ she may be reviewing the downloaded content and downloading will be nil or minimal during this time.

Importantly, the data speed as seen by the customer is largely dependent on many parameters like the congestion at the server (where the accessed URL is hosted), congestion in the path/ routers towards the destination server, which are not in the control of the operator. It is, therefore, strongly felt that, it is nearly impossible to precisely guarantee a minimum guaranteed speed for entire customer base in any sector/ Node-B at all times.

However, an attempt could be made for ensuring such services for a minimum of say 80% of the active data customers based in a sector/ Node-B Accordingly, the following minimum guaranteed speed in our view could be offered to at least 80% active data customers at all times:-

For 2G - 20KBPS
For 2.5G - 28KBPS
For 3G - 256KBPS

29/2/15/14
21/5

Question 2: *Should the service provider be mandated to inform the minimum download speed to customers along with each tariff plan? Please give your comments with justification.*

Presently, it is not technically feasible to implement customer-wise, tariff plan-wise download speed restrictions/ enablement. Restricted guaranteed tariff plan wise download speed would only be feasible once the Policy Control resource Function (PCRF) would be implemented in the network.

25/05/14
19/5/14
Sukhdev Singh
DGM (Regn-II)