



To,

Advisor (Broadband & Policy Analysis)
Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan
Jawahar Lal Nehru Marg, (Minto Road)
New Delhi-110002

Kind Attention: Sh. Arvind Kumar, Advisor (Broadband & Policy Analysis)

No: Regln/1-33/2014/

dated: -07-2017

Sir,

Sub:- Draft BSNL comments on TRAI's Consultation Paper on "**Data speed under Wireless Broadband Plans**".

Kindly refer to the TRAI's press release no.40/2017 and Consultation Paper dated 01-06-2017 on "Data Speed under Wireless Broadband Plans". In this context, the BSNL's point-wise comments on the consultation paper are as follows.

Q1: Is the information on wireless broadband speeds currently being made available to consumers is transparent enough for making informed choices?

BSNL's Reply: Yes, the information on wireless broadband speeds currently being made available to customers is transparent enough for making informed choices. The additional information, if provided, for example, downloads speed, upload speed, latency, packet loss etc will have very little impact on the choices of customer as this type of technical information can be comprehended by only limited number of technically competent customers.

Q2: If it is difficult to commit a minimum download speed, then could average speed be specified by the service providers? What should be the parameters for calculating average speed?

BSNL's Reply: No, average speed cannot be specified by the service providers. There are number of factors affecting internet speed like device connection, faulty device, network tariff, coverage, signal strength, number of concurrent active subscribers, Type of application being accessed like heavy video streaming , location of the customer and distance from the base transceiver station (BTS)/ Node B; peak/off peak time/ specific event; customer-premises equipment being used etc. Therefore, in presence of such factors, specified speed cannot be specified by the service providers in INDIA.

Q3: What changes can be brought about to the existing framework on wireless broadband tariff plans to encourage better transparency and comparison between plans offered by different service providers?

BSNL's Reply: The existing framework on wireless broadband tariff plans is transparent enough, based on which the customer may take informed decision while choosing the wireless broadband tariff plans. The amount of free data with plan, type of data plan i.e. unlimited/ limited, validity of plan, MRP of plan give enough criterion to customers to compare and select among the different plans offered by different service providers under present scenario.

Q4: Is there a need to include/delete any of the QoS parameters and/or revise any of the benchmarks currently stipulated in the Regulations?

BSNL's Reply: No, there is no need to include any of the new QoS parameter in the Regulations. In view of the facts that a large number of free apps are available to the customer, which will help him to assess the network quality as applicable to him that has relevance to his location and usage profile. QoS parameters obtained from the operator or assessed by regulator or any independent agency may not serve much purpose in the context of wireless networks. Hence it is felt that customers can make their choice of the network based on their experience of network.

Q5: Should disclosure of average network performance over a period of time or at peak times including through broadband facts/labels be made mandatory?

BSNL's Reply: May not be made mandatory. However "BSNL use reasonable, non-discriminatory, network management practices to improve overall network performance for all users. Our network management practices do not target any service content, application, service, or device. As network management issues arise and as technology develops, BSNL may employ additional or new network management practices"

Q6: Should standard application/ websites be identified for mandating comparable disclosures about network speeds?

BSNL's Reply: No, The customer is already having wide variety of choices in order to judge the quality of network that is available to him. Most of the APPs are giving a choice to select appropriate servers to judge the network quality. As the customer needs to assess the network from his need/ location based criteria, other steps does not feel to be necessary.

Q7: What are the products/technologies that can be used to measure actual end-user experience on mobile broadband networks? At what level should the measurements take place (e.g., on the 26 device, network node)?

BSNL's Reply: The measurements are ideally to be done at the device level so as to capture customer experience. But such facilities are likely to be intrusive and may also drain the hand set battery as well. TRAI is already conducting independent drive test for all the operators and publishing report on their website which is readily available for customer.

Q8: Are there any legal, security, privacy or data sensitivity issues with collecting device level data? a) If so, how can these issues be addressed? b) Do these issues create a challenge for the adoption of any measurement tools?

BSNL's Reply: Yes, all the measurement tools extract the payload information of customers which include the encrypted/ unencrypted data. This may compromise privacy and security of customers. This will be similar to unauthorized interception.

Q9: What measures can be taken to increase awareness among consumers about wireless broadband speeds, availability of various technological tools to monitor them and any potential concerns that may arise in the process?

BSNL's Reply: No comments to offer on this issue.

Q10: Any other issue related to the matter of Consultation.

BSNL's Reply: No comments please

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