FEDERATION OF CONSUMER AND SERVICE ORGANIZATIONS

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(Regd. No.CAG/01/2016 as a Consumer advocacy group with TRAI)

No.5, 4th Street, Lakshmipuram,

Tiruchirappalli – 620 010. T.N. State .

The Chairman,   16th, June, 2017

Telecom Regulatory Authority of India,

New Delhi – 110 011.

Kind attention to : Shri Sanjeev Bansal, Advisor (Networks,

Spectrum and Licensing), TRAI

Dear Sir,

Sub: Our view on Consultation Paper on Network Testing before Commercial

Launch of Services – reg.

We appreciate the TRAI for seeking views on the above subject. In this regard, we submit the following as our view:

Q1. Should a TSP be allowed to enrol subscribers as test users and in such case, should there be any restrictions on the number of test SIM cards and the period of such use? Please justify your response.

Ans: Yes, it is an important testing of network before release to commercial in ensuring QoS and selection of the consumers are up to TSP's choice, they should be enrolling Consumer Advocacy Group Members as the test users to know about their experience, which is better from common/ general consumers. The period may be 90 days and it may extend with the concurrence from regulator.

Q2. To clearly differentiate test phase from commercial launch, which of the options discussed in Para 1.12 would be appropriate? Please provide justification. Please explain any other method that, you feel, would be more appropriate.

Ans.: Most of the points with the point put forward by TRAI in Point 1.12 of the Consultation Paper. It is essential that the trial should be on a large scale to study nuke and corner, hills, valley, urban and rural.

Q3. Do you agree that the provisions discussed in Para 1.13 viz. information to the subscribers about test SIM being temporary etc., should be put in place for the TSP testing its network involving test users/subscribers? Please suggest other provisions which should be mandated during test phase?

Ans: Para 1.13 is a very fair and rightly suggested point. Besides the points, test users may be provided with Data cap (it can be 4-5GB) but not more. Since most of the competition is around data, network testing can be abused by TSP. Limited will help TSP to test their network to greater extent while also ensuring they adhere to rules of the game. Besides, deactivated test SIM shall not be allowed to be re-activated. Once test time is over, SIM has been discarded. Testing SIM should be compatible with any slot and any type of of the phone (now jio sims works only 4G phones).

Q4. Is there a need to have a defined timeline for testing phase i.e. period beyond which a TSP should start offering commercial services? If yes, what should be the timeline? Please justify your response.

Answer: There is a need to clearly define pre-commercial period. Every TSP should submit a proposal to TRAI before initiating the trial phase and clearly define the objectives of the trial and time; this time may be extended with prior approval from regulator.

Q5. In case enrolling of subscribers as test users before commercial launch is allowed, whether subscriber related conditions and regulatory reporting requirements laid down in the license, be imposed for the test subscribers enrolled before commercial launch? Please provide justification to your response.

Ans: Before allowing to commercial launch; the TRAI may analyses the observations from the test users especially about quality of service. .Our sincere view; TSPs should get aadhar identification from their respective telecom consumers even for test and commercial.

Q6. Should test users/subscribers of such licensees be given the facility of MNP? Please justify your answer.

Ans: We thing that is not required.

Q7. If there are any other issues/suggestions relevant to the subject, stakeholders may submit the same, with proper explanation and justification?

It is being noticed that TSPs submit network testing report and compliance report for getting approval for launch, however in strengthening this test, the TRAI may involve the CAGs and their experiences in the test period. We also suggest to check the misuse and for proper identify; the TSP may sell the SIM card on verification of their aadhar in the line of Jio.. .

Thanks and regards.

M. Sekaran.
President.