ISPAI Response to TRAI Consultation Paper on Data Speed under Wireless Broadband Plans

Q.1 Is the information on wireless broadband speeds currently being made available to consumers is transparent enough for making informed choices?

ISPAI Response: There is uncertainty of broadband speed being available at the place/ time for mobile internet user because by the very nature of the network architecture it is difficult to forecast, hence commit any fixed download speed to the consumer.

It is therefore, necessary to distinguish between wireline broadband services including point to point broadband services delivered on Radios by ISPs and internet access services on cellular networks.

In our view the internet access services being provided on cellular networks including 3G & 4G should be termed as Mobile Internet and not as mobile broadband.

Q.2. 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?

ISPAI Response: Broadband requires to commit a minimum download speed. In wireless internet, it is difficult to commit a minimum download speed. Therefore, it is difficult to commit even average speed for the reason as above.

However, average speed needs to be measured by the Wirelesses. Such average speed to be made available for the customer during usage and as historic information as well for past periods.

Q.3. 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?

ISPAI Response: Tariff should be based on usage in Bytesand average speed for a given period. In case average speed is lower there should be either discount or extension of plan time period.

Q.4. Is there a need to include/delete any of the QoS parameters and/or revise any of the benchmarks currently stipulated in the Regulations?

ISPAI Response: QoS parameters for Wireless Internet should be transparently indicated. When user contacts customer care, he/she is informed that wireless speed depends on many factors; mainly number of users connected in the particular sector of the wireless base station.

Bench mark should clearly indicate when the speed would be less than the plan during start of the session and during the session.

Q.5. Should disclosure of average network performance over a period of time or at peak times including through broadband facts/ labels be made mandatory?

ISPAI Response: It should be mandatory to provide average speed at network level as well as for the user. Such average speed should be available for peak time as well. Peak time also needs to be defined by the WirelessTSPs. Such peak time could be different for different places.

Q.6. Should standard application/ website be identified for mandating comparable disclosures about network speeds?

ISPAI Response: Yes, it should be mandated to provide comparable disclosures about network speeds. It is specifically important to mention here that such network speeds should be available location wise and not for the whole service area.

Q.7. 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 device, network node)?

ISPAI Response: The measurement has to take place at the device level as wireless segment is the most likely contributor to the congestion.

Q.8. 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?

ISPAI Response: Privacy is important and due care should be taken while defining, capturing data. There should be full transparency with the user and user consent should be required for any privacy data to be captured by network provider.

Q.9. 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?

ISPAI Response: There could be Apps developed for the same. Such Apps should also take into consideration the service pack taken by the user.

Q.10. Any other issue related to the matter of Consultation?

ISPAI Response: No