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I strongly believe that there is an urgent need for TRAI to revisit the definition of "broadband". We appreciate that the authority is already alive to this concern. Based on TRAI recommendations, the Department of Telecom raised the minimum broadband speed from 256 Kbps to 512 Kbps in July, 2014 . It is my submission that further revision needs to be carried out raising 1 broadband speed to a minimum of 8 Mbps download/upload speed. Further, this speed should be revised every two years.

I fully agree with the response of the SaveTheInternet team, which has been attached.

Any regulation that defines "broadband" should, in addition to minimum speed, address the following concerns.

1. The minimum guaranteed speed must be specified separately for uploads and downloads. Specification of upload speed is especially important because users are content/service creators on the internet.
2. Latency to point of presence (PoP) of the service provider is also an important measure of network quality, and thus must be specified as well. Further, latency must be individually defined for each kind of lastmile connectivity (xDSL, cable, fibre, 3G, 4G/LTE etc.) that an ISP provides.
3. As network outages are still commonplace, minimum uptime must be specified as well. Proposed definition Due to the reasons set out above we suggest the authority consider the following definition of "broadband" "Broadband is a data connection that is able to support interactive services including Internet access and has the capability of the minimum download speed of 8 Mbps and upload speed of 8 Mbps to an individual subscriber from the point of presence (PoP) of the service provider intending to provide broadband service."

Transparency in fair usage policy(FUP) :

I would like to urge TRAI to fully ban the concept of a fair usage policy. India is a data hungry country and the current dismal state of broadband proves that so far TRAI's steps have failed in bringing change. Banning FUP will lead to truly unlimited internet plans which are the need of the hour.

I would like to also strongly protest against the comments provided by Airtel and other ISPs where they ask TRAI to reduce post-FUP speed to 64kbps because we're misusing all the 512kbps we get.

This is not only atrocious as a suggestion but also criminal. Such kind of comments are a proof of the complete failure of the system.

They requested because this they want to sell their SmartByte Packages. Once you exhaust your limit, you can topup your account with them.

1GB for INR 99/-, 2GB for INR 159/-, 5GB for INR 299/-, 10GB for INR 499/-, 20GB for INR 799/- and 50GB for INR 1499/-.

such kind of malicious business practices should be halted immediately because they are misleading in nature. Not only that, it underscores how a minimum broadband requirement is also needed. Similar to base cable packages, a base internet pack should also be mandated for all ISPs.

Also, I would like to protest against the following statement in the reliance submission:

"In order to avoid any misuse of the broadband service beyond the designated quota, a service provider should be provided the freedom to throttle the speed after the expiry of assigned data limit to the customer."

It is not the business of ISPs to police the misuse of users, there are several provisions in the law already present to tackle this issue at hand. Similarly, since TRAI has, in it's Net Neutrality guidelines specifically stated that throttling should not be allowed, similar guidelines should apply in case of ISPs.

The rest of the points can be found in the document attached below.

I just want to say this in the end. we will be making "Digital India" at 64kbps then, kudos to all parties involved in screwing up broadband in India.

Sincerely, I request you to come up with a complete overhaul of broadband policy in India.

