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Email-Message

To,   Dt.22/01/2016
           Advisor(NSL-I)
   Telecom Regulatory Authority Of India
              NEW-DELHI

Comments over draft direction under TRAI Act,to ISP for delivering BB services in transparent manner reg.

Sir,
      TRAI have take an initiate to regulate BB service in transparent & make it more customer centric hence prepared draft and invite general public,stake holder's comments ,In order to give input I have following view in this context ,as under.

I have disappointed to know about draft direction of TRAI,taking note that how Telecom Regulator is going in reverse mode.

Needless to say that service is already regulate by various regulation's,there is no significant need to bring further regulation,which in alter only speed of 512 Kbps. Wheras the said speed already notified by MOCIT on dt.18thJuly,2013, all the ISP is statutorily bound for provisioning & maintain speed at their system end.

in fact,it is needs of time to uplifting barriers for upward revision of BB speed currently is 512 Kbps.

   The following facts must be keep,before further proceeds.

(1) In earlier in July-2009,the TRAI have recommended to DoT, that country should be served at least 2Mbps BB speed,then how at this juncture the TRAI is making emphatic efforts over to regulate speed at 512 Kbps?
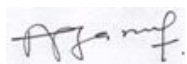
   The following comments of TRAI observed over National Broad band plan

   It is universally recognised that the minimum speed as per definition of broadband in India is very low i.e. 256 kb per second. What has been proposed by the Authority as part of the National Broadband Plan is a minimum download speed of 512 Kbps immediately and 2 Mbps by 1st January 2015. It is absolutely essential that this definition is adopted, failing which, there will be serious quality of service issues.

(2) The TRAI has been periodically issuing paper's among of them The staus paper on BB speed(2008),TRAI view observe as under

   In respect to India, the contents requiring high speed are very limited. The existing networks are not in position to support high speed Internet and up-gradation for these networks. Introduction of new networks supporting high speed are also likely to take some more time.

(3) The Govt. of India has brought National Telecom Policy-2012 ,the policy is inter-alias following narrated.

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Part-IV-Strategies - 1 Broadband,Rural Telephony and USOF

> *1.5- To revise the existing broadband download speed of 256 Kbps to 512 Kbps and subsequently to 2Mbps by 2015 and higher speeds of at least 100 Mbps there after.*

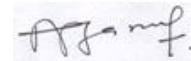Instead of to streamline the policy requirment,the TRAI exercising is now quite going -on in different direction.

(4) The Government have moved toward direction of *"Digital India"*,If the telecom sector functionaries want to success it & make in reality,in that case the BB speed enhance is should be mandatory from its existing level.

(5) It is also pertinent to mention here,while we see to International scenario almost of Countries have already served BB speed as higher range between16 Mbps to 100 Mbps,however in India the auothority is exercising to regulate the speed at 256 & 512 Kbps,

(6) Telecom sector entities have joined hand to fulfill the unknown interests,the Policy Governing body,Regulator, & Service Operator now not in position to reveal that what real hurdles,they have been facing toward higher speed provisioning?

In view of above scenario ,It seem that higher Broadband speed at 2 Mbps through out Country is more far away from this point,In mean time, these efforts it is not more than trying to filling-up big dig with small stones & act of compensatory nature of the authority.

I am totally disagree with this draft,as there is now no new contents as earlier direction of dated 27th July 2012,hence no any comments.

Regards

Objector

Narendra Agarwal