

10-08-2017  
Rasipuram

**To,**  
Shri Arvind Kumar,  
Advisor (Networks, Spectrum and Licensing),  
Telecom Regulatory Authority of India  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg,  
New Delhi-110002

**Subject:** Comments on TRAI Consultation Paper - 'Data Speed Under Wireless Broadband Plans'

**Dear Sir,**  
Please find my responses below on this consultation paper.

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

**Comment:** No, currently information is more focused on the bundle (data volume) rather than the speed. It is worth to publish the same with the minimum and maximum speed which can be attained in a particular area (Rural, Urban, Metro etc...).

**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?

**Comment:** Better to specify minimum download speed as well along with average speed. While calculating the speed, need to consider the parameters such as working day (Monday to Friday) / holiday (Saturday & Sunday) and peak & off-peak periods. Parameter which can be considered for calculating average speed are 1.) Number of users / Concurrent sessions. 2.) Period / Time of the

measurement 3.) Day of the week. 4.) Location of the device & 5.) Web Server response times.

**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?

**Comment:** Enforcement of highlighting minimum speed delivered to the customers under specified condition (e.g., provided customer is getting the sufficient signal strength to make and receive calls; Fair Usage Policy if any ; ) and steps to follow if it doesn't meet (e.g., complaint process). CSPs needs to publish the comparison chart for the tariffs they are providing to make easy for the consumers to understand the same. TRAI may need to publish the comparison of tariffs across CSPs in the same format by acquiring the feed from CSP in the pre-defined format periodically.

**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?

**Comment:** Below parameters can be included as part of QoS:

- 1.) Consumer Satisfaction / rating of the particular service/tariff. Initially it won't be available, but CSPs should start publishing this after x no. of months the service is offered based on the number of renewals of particular service / tariff versus fresh subscription and disconnection of the same.
- 2.) Likely Contention Ratio

Below parameters can be deleted as part of QoS:

- 1.) Transmission Attempts
- 2.) PDP

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

**Comment:** Yes, disclosure of average network performance over a period of time and at peak times should be made mandatory (can be auditable by TRAI on the numbers reported by ISP) and same could be published in the regulatory website for public awareness.

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

**Comment:** Yes, it can be pre-identified but should be possible to change it periodically (based on the traffic pattern). But the responsibility for the identification of standard application/websites for mandating comparable disclosure should be with TRAI and for every month / quarter it should be notified to the CSPs to publish the statistics for the forthcoming periods.

**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 device, network node)?

**Comment:** Existing various broadband testing tools can be used which covers all the necessary parameters (e.g., packet loss, Jitter, ping, download & upload speed etc...). To get the better results and avoid confusions, it would be better if TRAI enforces all the CSPs and consumers to publish the results using its own app (MySpeed).

Recommendation is to do the measurement at the device level under the specified conditions (e.g., no other device/user is connected to the same connection via personal hotspot / tethering / wi-fi)

**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?

**Comment:** Yes, there will be legal, security, privacy and data sensitivity issues while collecting device level data. It can be addressed by only collecting the data which are mandatory for the speed measurement and the party who is collecting this data shouldn't use this for any other purpose along with the pre-specified archival period for this data. Also the system/app which is collecting this data should always use the encryption & decryption technologies to store and retrieval of this data as these apps are not expected to deliver the results with quick turnaround time. Since the recommendation is to publish such app by TRAI itself, it shouldn't be an issue.

**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?

**Comment:** Consumers needs to be educated through public forum (e.g., TV advertisement, websites, related periodicals etc..) about what are their rights while subscribing to a particular wireless broadband plan and how to validate the same using the technological tools available to them. It would be better to recommend the subscribers to use the tool recommended by TRAI (MySpeed) for measuring wireless broadband speeds instead of any other available tool.

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

**Comment:** N/A

Thanking you,

Yours Faithfully,  
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