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FEDERATION OF CONSUMER AND SERVICE ORGANIZATIONS

Promoted exclusively to deal with the pressing issues..

(CAG Member with TRAI)

No.5, 4th Street, Lakshmipuram,
Tiruchirappalli – 620 010. T.N. State .

The Chairman,
Telecom Regulatory Authority of India,
New Delhi – 110 011.

04th, July, 2017

Kind attention to: Shri Arvind Kumar, Advisor, (Broadband & Policy Analysis)

Dear Sir,

Sub: forward our view on Consultation Paper on Data Speed Under Wireless
Broadband Plans – reg:

We most respectfully forward the above for your kind consideration in the larger interest of innocent telecom consumers:

Issues for Consultation

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

Ans: No..

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?

Ans: This is not transparent and there are no measures to find out. Now the wire line broadband is very less compare with wireless. The service providers claimed higher speed for particular G.B., and after usage of certain limits, over which we can't cross check, the broadband starts working with a slower speed, but the experience is different, not easily accessible, like the original speed. The Consumers are left with no option to measure their usages and are only at the mercy of the TSPs.

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?

Ans: The U.S.A. method is better to follow, but as this Consultation Paper described that the TSPs express their stiff resistance for any such transparency.

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?

Ans: The TRAI's "My apps" may help the telecom consumers by using portability; but this facility not accusable to the telecom consumers spreading in gross route level. There should be system which should be introduced to measure the speed and usage like call rates and durations.

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

Ans: Yes ,it should be made mandatory..

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

Ans: Yes, it will help the telecom end users.

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 26 device, network node)?

Ans: The USA model devise and regulation may help to the consumers.

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?

Ans: This is only to escape from the accountability. There is nothing wrong to declare the location of the telecom consumers, unless he is in illegal activities. The so called privacy is nothing but indirectly helping to the antisocial and habitual criminals. In such cases, the TSPs are providing information to the investigation agencies. So, there will be no threat on common telecom consumers. If they use the landline, the location could be identified; in the

recent past, we used this system. When we found misuses and safety threats we were able to find the location of the telecom consumers.

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?

Ans: The consumers are unaware about the technologies available to measure speed on their broadband, this has to reach them; the service providers should introduce systems to display to the consumers, as they are being informed in call rate or USA systems.

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

Ans:

- As rightly pointed out, at present, service providers are selling SIM cards in the name of the underlying technology i.e. 2G/3G/4G. However, no speed whatsoever is being guaranteed by the service provider.
 - i. The BSNL is offering unlimited broadband service per month; but within a day or two it send SMS that you are crossing the high speed usage limit, if high speed need to be continued the consumer has to pay something, additionally. This is highly surprising and it is clear exploitation on consumers.
 - ii. The Jio also offers one GB per day; but some time it closes at very early stage claiming as follows: "you have exhausted your daily high speed internet quota of 1 GB. Now internet speed will be reduced to 128 Kbps, in case you do not have active data plan. To continue enjoying 4 G speed recharge now. Thereafter availing net connection is very tough job. We unable to calculate what is high speed Kbps and this lower speed..
 - iii. Some other TSPs are immediately after sending SMS, deduct from the balance and upgrade the alleged speed, automatically, without the consumers' concurrence.
- As highlighted in annex III as follows:

"In response to the consultation paper, service providers and their associations opposed the proposal to prescribe the benchmarks for minimum download speed. Their main concerns in this regard were limited availability of spectrum per operator in 2G/3G bands; low coverage zones such as basements, high rise building clusters, tunnels etc.; and variations due to external factors such as subscriber's device quality and type, number of subscribers browsing the data services, peak/off peak time, transmission bandwidth, external interference, website behavior etc. Considering the views of stakeholders, the Authority decided against prescribing any benchmark for the minimum download speed for various technologies."

- i. In this regard, we suggest that the Authority may be worked for gathers wide range response on consultation papers by publishes in local language to know the views from the consumers from gross route level. At present, as we mentioned in frequently; the service providers only participated and from Consumers side the response is very - very meager and only single digit response out of billion telecom consumers.
- ii. We also suggest in deciding by the TRAI and the experts based on the response received from the stakeholders; instead of decide at Open House discussion.
- iii. The open house is fully controlled by the TSPs and their supports.
- iv. From the Consumer side no persons participate to counter the highly paid professionals represented the TSPs.
- v. Apart the most of the open house discussions are conducting at New Delhi, even CAGs attached with TRAI (like us) unable to participate.
- vi. So, the TRAI may consider two things; if it really wants to serve to the consumers in better, the one is publish the Consultation paper in Local language and collect views from the consumers through CAGs attached with TRAI (they are spreading over the Nation) and 2nd is decided on merits from the received views on consultations by a committee constitute for such purpose. Strictly avoid the so-called open house discussions.

- The TSPs always speaks about the problems at the low coverage zones such basements, high rise building clusters and tunnels etc. These are very limited/ minimum compare with the vast area covered by them.. In this circumstance, the authority may classify some of the area as low coverage area and the remaining are full coverage area to fix the 100% bench mark.

Thanks and regards.

M. Sekaran,
President.