

Dear Sir,

We are pleased to present our views on the Consultation Paper on review of measures to protect interest of consumers in the telecom sector.

We commend TRAI's initiative to undertake this consultation process in order to protect the interest of the consumers by ensuring quality of service, effective redressal of consumer grievances and educating the customers. Moreover, with increasing competitive forces and introduction of regulatory measures such as number portability, this sector will continue to experience constant upward revision in Quality of service standard ahead of mandate norms.

In this submission, we are restricting ourselves to a few suggestions concerning Broadband services. These views are in line with our earlier response on TRAI's consultation paper on National Broadband Plan.

The present norms in respect of Quality of service for broadband services are well defined. As Wireless Broadband Services evolve, there would be further need to review and more stringent QoS norms may be considered as implemented in case of fixed and mobile voice services QoS norms.

Some observations/suggestions are as follows:

- Some significant parameters that need to be included in the Regulations are Broadband Fault Rate and MTTR. These parameters should carry the same performance targets as fixed line voice.
- Since broadband (especially fixed line) is an add-on voice or video (in case of cable operators) and new last-mile cabling is generally not required, the service provisioning norm should be tightened to 3 days.
- In case of consumer grievances redressal mechanism for broadband services, as a first level of interface, service providers should be permitted to operate through electronic means such as web based consumer complaint portal or an e-mail as an effective and time efficient redressal mechanism. In the event, Broadband subscriber is not able to access customer care of service provider through such electronic means, there would be a customer care number provided by service provider as an alternate mechanism.
- There is also a need to lay down conditions under which the claimed maximum achievable wireless broadband speed is computed. It can be seen that the disparity between actual speed and advertised speed is the major grievance area for most of the broadband subscriber, especially when broadband speed is increasingly becoming one of the deciding factor while opting for a broadband service provider. It is therefore necessary that service providers should make available information on broadband speed in a standard and comparable format in order to help consumers in taking an informed. Decision. In order to achieve this. TRAI

can lay down principles for a code of conduct for voluntary signing up by service providers, in line with practice adopted by Ofcom for Broadband Speed, to encourage operators to provide consumers with more information at point of sale on the speeds they could expect to obtain from their broadband services. Such voluntary and self-regulatory measure will help in increasing effectiveness of consumer education.

We hope our views would help in these efforts. We would be glad to share and explain our suggestions in person as well.