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To
Shri Arvind Kumar,
Advisor (NSL),
TRAI.

Sub : Comments for :Draft Direction on delivering broadband services in a transparent manner” dated 20-01-2016.

Sir,

I had the pleasure of having a diligent look over the said draft Direction and my comments are placed as below:

1. While I appreciate the intention of the Authority to bifurcate the services into fixed and mobile, *may I stress the **assurance of speed** of the broadband connection by the mobile broadband service providers* in addition to have a mention of the technology (3G/4G) offered by them, as envisaged in clause 4(a)(B) of the proposed Direction.
2. Clause 4(c) mandates a minimum download speed of 512 Kbps. Whereas Regulation 2(d) of the “Quality of Service of Broadband Service Regulations, 2006” (11 of 2006) of TRAI recognizes only those data connections with a minimum download speed of 512 kbps as ‘broadband’ without any exception to mobile broadband service providers.

Whereas the extant clause of the draft Direction would go to mandate only ‘fixed broadband subscriber’ with the minimum speed, leaving the mobile broadband subscriber in to lurch.

*In tune, I request the Authority to **include the mobile broadband service providers for a minimum guarantee speed of 512 kbps.***

3. Since clause 4(d) and 4(c) are symmetric to each other, my common opinion is as follows:
 - a. As said in point no. 2, the responsibility on the part of mobile broadband service provider to provide an alert on 80% usage is absent, *which may be included.*
 - b. In practice large number of subscribers are latched to routers to which their service is terminated, for “Wi Fi” facility, which would otherwise remain logged-on to 24X7 basis. In such case provision of alert message at “each login” would go otiose. *Instead the Authority may direct the service provider to initiate alerts on periodic intervals (say every 6 hrs/12hrs/by 6.00 am everyday) as decided by the Authority in the larger interest of consumers.*
4. In addition to the proposed directions may I suggest the Authority to kindly include the following:
 - a. *The Service providers may be mandated to provide the data usage of subscribers every day on any particular time by an alert trigger by SMS or mail, so that the subscribers can plan the usage accordingly.*
 - b. The practice of intimating the consumers for any planned disturbance by the ISP or MSP is missing. *The Authority may mandate the service providers to provide a “down time alert” or “planned outage intimation” to the subscribers at least 24 hours in advance for planned server upgradation or any forced shutdowns.*

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Hope, the hon'ble Authority would consider the aforesaid comments and incorporate the same in the proposed Direction.

Thanking you,

Your truly

R.L.Saravanan