



To,

The Advisor (QoS),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
(Old Minto Road), New Delhi-02

No: Regln/1-35/2015/ 2895

Dated: 6 March, 2017

{Kind Attn: Shri. Asit Kadayan}

Sir,

Sub: - Comments on Consultation paper on "Net Neutrality".

Kindly refer to your office press release dated 04-01-2017 vide which a Consultation paper on "NET NEUTRALITY" was released and sought inputs/ comments from the stakeholders. In this context, kindly find herewith the BSNL comments on the above mentioned consultation paper:

Q.1 What could be the principles for ensuring non-discriminatory access to content on the Internet, in the Indian context?

BSNL Reply: The principles for ensuring non-discriminatory access to content on the internet, in the Indian context subject to the legal conditions and Law of the land, the following is submitted:

- It should be available to all users irrespective of their plan. There should not be any restriction or any incentivisation based on differential charges of internet services.
- The customer should have freedom to use any device of his choice. He should be free to create post based access and share any content.
- The above activities of customer should not be restricted and controlled by the TSP.

Q.2 How should "Internet traffic" and providers of "Internet services" be understood in the NN context?

(a) Should certain types of specialised services, enterprise solutions, Internet of Things, etc. be excluded from its scope? How should such terms be defined?

BSNL Reply: Yes, it is felt that certain types of specialized services, enterprise solutions, internet of things, etc. be excluded from its scope as it is felt that certain type of services required a differential QoS approach in terms of guaranteed throughput, latency etc. for its swarful deliverance. Services fulfilling such specialised requirement should be excluded from the scope.

(b) How should services provided by content delivery networks and direct interconnection arrangements be treated? Please provide reasons.

BSNL Reply: it is felt that services provided by content delivery networks and direct interconnection arrangements should not be treated as specialised service and no differential treatment be matted out by them.

Q.3 In the Indian context, which of the following regulatory approaches would be preferable:

