

**Citycom's Response to the TRAI Consultation Paper on Net Neutrality;
dated 4th January 2017**

Q1. What could be the principles for ensuring nondiscriminatory access to content on the Internet, in the Indian context? [See Chapter 4]

Comments:

We are of the view that current legitimate traffic management practices should continue subject to the core principles listed below.

- Adequate disclosure to users about traffic management policies and tools to allow them to make informed choices.
- Application-agnostic controls may be used but application-specific control within the Internet traffic" class may not be permitted.

Q2. How should "Internet traffic" and providers of "Internet services" be understood in the NN context? [See Chapter 3]

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

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

Please provide reasons.

Comments:

A publicly available electronic service that provides access to the Internet, and thereby connectivity to virtually all end points of the Internet, irrespective of the technology or the terminal equipment used.

Our definition of Internet Services would be any service that provides generic connectivity to all Internet public IPs.

We are of the view that it would be prudent to exclude some services from the NN purview.

Enterprise Solutions: Enterprise solutions are very dependent on guaranteed QoS towards certain services and servers. Hence it might be prudent to exclude enterprise solutions from NN purview.

IOT: In our view, a vast majority of IOT services will be generic and should come under NN purview. Exception might be provided for only IOT for Emergency Services which will require guaranteed QoS.

It is our view that content from CDN networks and direct interconnection arrangements be treated as Network optimization solutions, this will improve the QoS to the customer.

Network optimization solutions such as interconnection arrangements, caching or content delivery network (CDN) services that offer a benefit by reducing the total distance of travel, not only improve the quality of service for those using the solution but also for other users that share the same local network of the ISP/TSP. This is because such solutions decongest the existing access network. Therefore, offering a benefit of improved performance through network optimization solutions (such as faster interconnection, caching or CDN services), rather improves their experience. In this context, improving overall performance through network optimization should be welcome.

Hence, provisioning of services by network optimization solutions by establishing CDN networks and direct interconnection agreements are in the right direction since it enhances the end user experience. These should be allowed and no restrictions should be applied for these.

Q3. In the Indian context, which of the following regulatory approaches would be preferable: [See Chapter 3]

- (a) Defining what constitutes reasonable TMPs (the broad approach), or**
- (b) Identifying a negative list of non-reasonable TMPs (the narrow approach).**

Please provide reasons.

Comments:

It would be good to have the narrow approach regulations of explicitly stating what is not acceptable. This would allow the ISPs/TSPs to frame their own policies for network optimization and market innovation.

Q4. If a broad regulatory approach, as suggested in Q3, is to be followed: [See Chapter 3]

