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To: sksinghal@traf.gov.in, jams@traf.gov.in

Cc: Sheilu Sreenivasan <sheilu.sreenivasan@dignityfoundation.com>, Ramani Iyer <ramani2211@gmail.com>

Subject: Comments on Consultation Paper on Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed

Sir,

We welcome the TRAI's initiative to have a Consultation Paper on Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed.

We being a Senior Citizen organisation -- we have special interest in making this document ELDER-FRIENDLY and make all policies inclusive of senior citizens.

In the attached document replies to questions . 2,3 4,11,21,22,23,24,25,26,28,29. have been briefly given.

Kind Regards

Javed Sheikh

Manager Strategic Partnerships

Dignity Foundation

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We welcome the TRAI's initiative to have Consultation Paper on Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed.

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About Dignity Foundation: Dignity Foundation is a not for profit organisation that been working for senior citizens since the year 1995. Dignity Foundation offers an enriching set of opportunities to lead a more dignified, secure, joyful and fulfilling life. Dignity Foundation deals with the psycho-social challenges of senior citizens in India irrespective of their caste, creed and economic strata. We help senior citizens deal with their insecurities (emotional, financial, health and safety) and loneliness and bring joy to their lives. Headquartered in Mumbai, Dignity has Chapters spread across six other cities – Ahmedabad, Bengaluru, Chennai, Delhi NCR, Kolkata and Pune.

Vision: To create an enlightened society in which the 50+ feel secure, confident and valued; and can live with dignity.

Mission: We are a non-profit organisation that is committed to changing the way people look at ageing in India. We enable senior citizens to lead active lives through easy access to trusted information, opportunities for productive ageing and social support services.

Our Programs: Dignity Helpline: Helpline service in all 7 cities | 5 days a week | 52 weeks in a year

Ration for the Poor Elderly: Ration support programmes in all 7 cities | Just ₹ 1200/- to provide monthly ration for a poor senior citizen and 1560/for a couple Help is just a call away! Access to a helpline that is managed by professional social workers, counsellors who provide psychological and emotional support as well as strategies for coping with difficult circumstances.

Day Care Centre for Senior Citizens: Mumbai, Bengaluru, Chennai | Monday to Friday | 10am – 5pm | 300 senior citizens impacted every day

Loneliness Mitigation Centres for the Poor Elderly: A platform for senior citizens to interact socially, build a support network, boost their self-esteem and lead an active life to mitigate loneliness. Mumbai, Bengaluru, Pune | Monday to Friday | 2 hrs every day

Skill Development for the Poor Elderly: Our endeavour is to engage the elderly in learning a new skill that would show an all-round improvement in their psycho-social-financial status.

Dementia Day Care Centre for Senior Citizens: A centre that provides a stimulating and conducive environment to people afflicted with Dementia and can maintain practical and social skills and enhance their self-reliance. The centre also provides respite for the caregivers who find it extremely stressful to provide care to the person suffering from dementia. Chennai | Monday to Friday | 10am – 5pm

Chai Masti Centres: Coming together to enjoy activities that ensure holistic wellness -- be it physical, mental, social or spiritual. Stimulating activities such as Yoga, Tai Chi, talks by finance & health experts, singing & dancing sessions, picnics, inter-centre events every quarter ensure members experience the joy of living! Foundation's most enjoyable activity space is the chai masti centre! 30 centres | 7 cities | Monday to Friday | 2 hrs every day

CHAPTER 7
ISSUES FOR CONSULTATION

Q.2: If you believe that the existing definition of broadband should not be reviewed, then also justify your comments.

Ans: Broadband penetration in India is at around 47%, which is significantly lower compared to China at 95%, and other European nations at around 95-115%. • In spite of having low average throughput³, India has a high average data usage. Increase in mobile network speed will further propel the data usage in the country.

Q.3: Depending on the speed, is there a need to define different categories of broadband? If yes, then kindly suggest the categories along with the reasons and justifications for the same. If no, then also justify your comments.

Ans: No The growing OTT consumption and the content shifting from SD to HD, and soon to 4k/8k videos, will make high speed and ultra-low latency a prerequisite

Q.4: Is there a need to introduce the speed measurement program in the country? If yes, please elaborate the methodology to be implemented for measuring the speed of a customer's broadband connection. Please reply with respect to fixed line and mobile broadband separately.

Ans: No Individual Providers provide with speed measurement

Q.11: Is there a need to develop common ducts along the roads and streets for laying OFC? If yes, then justify your comments.

Ans: All the advanced countries have ducting on roads for electricity, OFC and rider for sewage and water. If the wire has a problem, there is no need to dig the road but just pull out the damaged wire, using these chambers

Q.21: Even though mobile broadband services are easily available and accessible, what could be the probable reasons that approximately 40% of total mobile subscribers do not access data services? Kindly suggest the policy and regulatory measures, which could facilitate increase in mobile broadband penetration.

Ans: By 2050, the number of India's senior citizens will be to equal its under-18 population. So, the former has immense potential to constitute an entirely new customer base. The segment comprises over 110 million senior citizens with a literacy rate of 44%, and the penetration of mobile phones and internet access in this segment has been growing. Affordable and easy Smart Phone Purchase Options quick loans by Banks and NBFC for such purchases, Special Speed Internet connectivity plans Exclusively designed for Senior citizens these factors can be very instrumental in increasing Mobile Broadband penetration in this very BIG potential Market. **Being a Senior Citizen organisation -- we have special interest in making this document ELDER-FRIENDLY and make all policies inclusive of senior citizens**

Q.22: Even though fixed broadband services are more reliable and capable of delivering higher speeds, why its subscription rate is so poor in India?

Ans: This is still a very unorganized sector Broadband for Home is a major market but Multiple Operators offer services at a very High cost, Initial investment for Router, wiring etc is High. Housing Societies also don't allow all operators to give Broadband connections Unlike Electricity Connections where the customer has a choice to choose between Switching to any Power supply Companies. The same freedom is not available with broadband providers.

Q.23: What could be the factors attributable to the slower growth of FTTH subscribers in India? What policy measures should be taken to improve availability and affordability of fixed broadband services? Justify your comments.

Ans: Demand side issues: – Attractiveness (availability of relevant services)
– Affordability – Awareness for adoption of FTTH To encourage Fibre To The Home (FTTH) with enabling guidelines and policies, favoring fast transformation of cities and towns into Always Connected society To establish appropriate institutional framework to coordinate with different government departments/agencies for laying and upkeep of telecom cables including Optical Fibre Cables for rapid expansion of broadband in the country.

Q.24: What is holding back Local Cable Operators (LCOs) from providing broadband services? Please suggest the policy and regulatory measures that could facilitate use of existing HFC networks for delivery of fixed broadband services.

Ans: Total Neglect of Cable TV Industry There are many policies on paper to promote cable TV networks for broadband access like the ‘National Broadband Plan’ proposed by TRAI and the Telecom Policy of 2004 but practically nothing has been done in this regard. So much so that TRAI in its draft National Broadband Plan 2010 projected 72 million broadband Connections on cable networks by 2014 but while making regulations for the digitalization of the industry, forgot about using the high band width last mile that is best suited for Broadband. There is no mention of how the last mile networks will be upgraded to broadband networks, who will fund these small networks and consolidate them, from where the finances will come and how will the present owners of the last mile networks be encouraged to provide triple play services.

Q.25: When many developing countries are using FWA technology for provisioning of fixed broadband, why this technology has not become popular in India? Please suggest the policy and regulatory measures that could facilitate the use of FWA technology for delivery of fixed broadband services in India.

Ans: The cost and complexity of delivering fixed broadband has continually challenged the roll-out of high-speed data services. India has much to gain from rising to the 5G challenge and a tremendous opportunity to accelerate its own ambitions. It can learn from the experiences of early leaders to establish a 5G roadmap that can help drive the Digital India strategy and enable the country to distinguish itself as a challenger in shaping 5G technologies. Against this backdrop the Broadband India Forum (BIF) requested Policy Impact Partners (PIP) to prepare a comparative overview of the 5G policies and market development initiatives promoted by the five countries considered to be global leaders in 5G: China, Japan, South Korea (Republic of Korea), the United Kingdom, and the United States

Q.26: What could be the probable reasons for slower fixed broadband speeds, which largely depend upon the core networks only? Is it due to the core network design and capacity? Please provide the complete details.

Ans: Multiple factors affect the speed and quality of your internet connection. Transfer technology, your location, the number of people you share the connection with and the device you use are only some of these factors. There are also differences between a fixed network and a mobile network. Speed in fixed network Data transfer technology. In fixed networks, the main factor affecting the broadband speed is the technology used for data transfer. Fibre-optic and cable networks enable high-speed connections, whereas traditional xDSL connections provided over a telephone network have limited maximum transfer speeds. Network centralizer. The speed of your connection also depends on the distance between your terminal device and the network centralizer. The further you live from the operator's broadband centralizer, the more it affects the speed of your connection. Other

devices and users. Most of us have several different devices connected to the internet at the same time at home. If you use multiple services and you are not the only user of the network, this can cause the connection to slow down or cut out.

Q.28: Should it be mandated for TSPs and ISPs to declare, actual contention ratio, latency, and bandwidth utilisation achieved in their core networks during the previous month, while to their customers while communicating with them or offering tariff plans? If no, state the reasons.

Ans: Yes, It should be mandated for TSPs and ISPs to declare, actual contention ratio, latency, and bandwidth utilization in their core networks during the previous month to consumers.

Q.29: What could be the probable reasons for slower mobile broadband speeds in India, especially when the underlying technology and equipment being used for mobile networks are similar across the world? Is it due to the RAN design and capacity? Please provide the complete details.

Ans: Network technology and terminal device. The connection speed in mobile networks depends, in particular, on the network technologies available in the area and the features of the user's terminal device:

- the 4G network enables a high-speed connection in suitable circumstances
- the 3G network can be used in a wider area but the maximum speed is lower
- the GSM network is the most extensive network but the data transfer speeds are very limited

Other users. The mobile network capacity is shared between all the users in the area using the same network. During certain hours, there are many users, which causes the connection speed to slow down. Location. If the user changes locations, the speed may change because the signal varies depending on the coverage area. If you have mobile broadband at home, you can check your operator's coverage map to see how far you are from the base station.