



Date: 5th July 2016

Advisor (QoS)

Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan
Jawahar Lal Nehru Nagar, New Delhi - 110002

Dear Sir,

Re: Comments on Pre-Consultation Paper on Net Neutrality

1. We would like to thank Telecom Regulatory Authority of India ("TRAI") on progressing the debate on Net Neutrality by issuing this pre-consultation paper and providing an opportunity to all the stakeholders to register their opinions on this very important matter concerning Internet in India.
2. As you are aware, India with a population of more than 1,250 million has more than 331 million Internet subscribers, out of which more than 135 million are Broadband subscribers. This reflects that Internet penetration is still relatively low in India and growth, connectivity and coverage are the areas which the industry needs to focus on. Given the stage of Broadband Internet penetration in India, it will be very useful if TRAI is able to resolve and provide complete clarity on all the aspects of Net Neutrality. We feel that such clarity will go a long way in inviting investments into the sector, which investments in turn will enable faster Internet penetration and economic development of the country. However, considering the relative stage of development of the ecosystem in India, the rules should not be rigid but flexible in order to promote innovation rather than stifle growth in this sector.
3. Following are few key aspects which we believe are particularly important in the context of this consultation paper.

4. Clarity on the concept of Paid Prioritization

- a. We feel that one of the key aspects that require clarification in the discussion paper is the concept of Paid Prioritization. Some of the relevant extracts of Paid Prioritization covered in the TRAI pre-consultation paper dated 30th May 2016 are reproduced below for the sake of convenience:

" 17. The following are some practices that may be regarded as unreasonable interference with Internet traffic by a TSP:

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