

No.MTNL/CO/RA/CP on Bandwidth required for ISPs/2009

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To,
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TRAI, New Delhi.

Subject: MTNL's comments on consultation Paper on "Bandwidth required for ISPs for better connectivity and improved quality of service"

TRAI vide its Press Release No. 7/2009 dated 15.1.2009 called views of stake holders on TRAI Consultation paper on Bandwidth required for ISPs for better connectivity and improved quality of service. The comments of MTNL on TRAI consultation paper are as below:

3-1) In order to ensure sufficient bandwidth for good quality broadband service, should some "Thumb Rule" for maximum contention ration be fixed for dial up, broadband, high bandwidth services & leased line internet access? If so, what should be the values for different Internet services? Kindly give your suggestions with justification.

Reply: The contention ratio for different types of internet services may be taken as below:

- For dialup connection, the contention ratio may be defined as high as 60 ,without any discrimination between home and business users. In fact there is no need to define contention ratio for Dialup as the no. of users of dialup services are very less and are diminishing day by day. So, the focus should be on Broadband subscribers as contention Ratio is more concerned with them only. Worldwide contention ratio is defined for broadband subscribers.
- For broadband services, the contention ratio should be 50 for home customers & 30 for business users for internet services. MTNL broadband network is designed for 50:1 contention ratio because all subscribers in the network are assumed as residential users.
- High speed services will depend upon the priority given to the service. In present network of MTNL provisions can be made for different contention ratio for different categories. However detailed QoS requirements will have to be worked out and the implementation of QoS will have to be discussed with present vendors of Broadband network which requires time, so TRAI should give ample amount of time for implementation of any recommendation in this regard.

- Services like IPTV do not consume International BW and use local core only. IPTV services of MTNL do not use BRAS and static provision of BW is made for this service in MTNL BB network, so there is no need to define contention ratio for IPTV service.
- For leased line, there is no need to define contention ratio presently. However as stated earlier, MTNL shall take into consideration the requirement of BW for leased line also while making provision of bandwidth at international gateway.

3-2) Will defining contention ratio likely to impact prevailing Internet/Broadband packages to access Internet? Give your suggestions with justification?

Reply: If ISP plans fixing contention ratio for home and business users separately, then different broadband packages are to be offered for different type of consumers. As contention ratio decreases, price of International Bandwidth increases due to different level of 'service agreement'. The contention ratio of 30:1 for business subscribers shall require higher international internet bandwidth which at present MTNL procures from vendors of international bandwidth. Considering the high cost of international bandwidth, the package having 30:1 contention ratio shall have to be priced above the package having 50:1 ratio.

In addition MTNL shall also require time for procurement of higher international internet bandwidth, as MTNL shall have to consider requirements of other users such as E-Procurement system, Certifying Authority System, MPLS, leased line etc. who are not on broadband network but use the same bandwidth.

3-3) Any other suggestion to improve quality of Internet/ Broadband access to end users?

Reply: The criteria of peak time bandwidth usage will be perhaps better than contention ratio. Peak time bandwidth usage can be restricted to say 90 % and it should be ensured that more bandwidth is provisioned as soon as peak bandwidth usage exceeds a predetermined value.

The cost of International Bandwidth should be reduced so as to make it affordable for the ISPs to provide more internet bandwidth to the end user keeping the tariff same.

(Mukta Goel)
DGM (RA)