



Fwd: Comments on TRAI proposed wireless minimum download speed & related

A. Robert J. Ravi, Advisor <advqos@traf.gov.in>
To: broadbandpmrqos@gmail.com, sroqos@gmail.com

Tue, May 6, 2014 at 12:51 PM

----- Forwarded message -----

From: Vipin Madishetty <vipinmadishetty@gmail.com>

To: advqos@traf.gov.in, daqos1@traf.gov.in, daqos2@traf.gov.in, cp@traf.gov.in, hsjam@cedt.iisc.ernet.in, memberra@traf.gov.in, secretary@traf.gov.in, ramchand@traf.gov.in, pradVegal@traf.gov.in, pradvbcs@traf.gov.in, pradvre@traf.gov.in, pradvfa@traf.gov.in, pradvfn@traf.gov.in, adveco@traf.gov.in, advlegal@traf.gov.in, advmn@traf.gov.in, advbcs@traf.gov.in, advcn@traf.gov.in, advbbpa@traf.gov.in, advfn@traf.gov.in, advadmn@traf.gov.in, jafn@traf.gov.in, jare@traf.gov.in, jamn1@traf.gov.in, daeco@traf.gov.in, daca@traf.gov.in, daab@traf.gov.in, dalegal1@traf.gov.in, dalegal2@traf.gov.in, dafn@traf.gov.in, dacn@traf.gov.in, dabcs@traf.gov.in, damn1@traf.gov.in, damn2@traf.gov.in, srofa1@traf.gov.in, sroeco1@traf.gov.in, srofa2@traf.gov.in, sppscp@traf.gov.in, pacp@traf.gov.in, ppssecretary@traf.gov.in, pamember@traf.gov.in, sroqos1@traf.gov.in, sroqos2@traf.gov.in, sroqos3@traf.gov.in, soqos1@traf.gov.in, soqos2@traf.gov.in, toqos@traf.gov.in

Cc: mocit@nic.in, secy-dot@nic.in, memberf-dot@nic.in, membert-dot@nic.in, members-dot@nic.in, advisorf-dot@nic.in, advo-dot@nic.in, advt-dot@nic.in, jtsecy.hq-dot@nic.in, srddgwpf-dot@nic.in, ast-dot@nic.in, jst-dot@nic.in, jsa-dot@nic.in, ddgbb-dot@nic.in, ddgnt-dot@nic.in, ddgds-dot@nic.in, ddgtpf-dot@nic.in, pankajkumar@nic.in, manchanda@nic.in, suresh.s@nic.in, pk_panigrahi@yahoo.com, shaukat_tirmizi@yahoo.com, jafusof@gmail.com

Date: Mon, 05 May 2014 11:28:35 +0000

Subject: Comments on TRAI proposed wireless minimum download speed & related

To, Shri A. Robert J. Ravi, Advisor (CA & QoS), TRAI

Respected Shri A. Robert J. Ravi,

This is with reference to TRAI's joke seeking comments on its proposed 'minimum guaranteed speed' for wireless internet services GSM - 2G, 3G and CDMA - 1x, EVDO. I use the word joke to describe the entire exercise for two reasons.

First, the proposed minimum download speed by TRAI is result of a regressive crony mindset and will result in India becoming a technological slum. Second, there is no doubt that these so called farce minimum download speed will never ever be enforced both in letter and spirit by the telecom operators nor will TRAI ever taken take action against these telcos if they fail to adhere to the minimum download speed QoS set by TRAI.

The exercise to set minimum download speed for wireless is a crony agenda to allow TSPs to legally degrade and lower their speed to TRAI proposed ones, as TSPs will claim to their customers that they are already providing minimum download speed set and mandated by TRAI. For e.g. in 3G and EVDO, the current average speed is 2-2.5 Mbps and TRAI's proposed minimum download speed of 1Mbps for 3G and EVDO will legally allow TSPs to degrade and slow down their speed to 1Mbps as this is the minimum speed they need to adhere to.

Therefore, TRAI needs also needs to legally mandate an average throughput for packet data at >90% of the subscribed speed and latency of <150ms along with minimum download speed for wireless networks.

History is testimony to TRAI intentionally turning blind to repeated violations by telecom operators against consumers, and therefore clearly prove the farce behind this exercise. Nevertheless, since TRAI has solicited

comments from the public, I want to place my comments on record, so that it will stand as a testimony in the court of law for future course of action. The comments are as follows:

1: What are your views on prescribing benchmarks for minimum download speed as above? Please give your comments with justification.

The minimum download speed proposed by TRAI are: GSM 2G - 56 Kbps, GSM 3G - 1 Mbps, CDMA 1X - 56 Kbps, CDMA HSD - 512 Kbps, CDMA EVDO - 1 Mbps ... with 95% success rate for GSM 3G, CDMA HSD and CDMA EVDO.

As mentioned earlier, minimum download speed proposed by TRAI is regressive and puts India into the technologically slum world map. Worldwide, several countries who have even somewhat mature telecom wireless networks, have either proposed or already practice a minimum download speed ranging from at least 50% and up to 75% of the advertised/wireless network capable speed (of 2G, 3G and EVDO). South Korea, an Asian country, is a good example. It is another matter if TRAI willfully wants to selectively and arbitrarily choose only those countries whose benchmarks are the lowest or worst and propose it for India.

In India's case, minimum download speed proposed by TRAI are on average just 20-25% of the wireless network capable speed (of 2G, 3G and EVDO). GSM 2G or EDGE wireless network is capable of data speed up to 256 to 296 Kbps (TRAI proposed - 56 Kbps), GSM 3G or HSDPA wireless network is capable of data speed up to 3.6 Mbps to 21.1/42.2 Mbps (TRAI proposed - 1 Mbps), CDMA EVDO wireless network is capable of data speed up to 3.1 Mbps to 4.9 Mbps downlink per carrier (TRAI proposed - 1 Mbps).

From the above, it can be clearly and unambiguously concluded that minimum download speed proposed by TRAI is just a measly 20-25% of network capable wireless data speed, when compared to worldwide benchmarks of 50-75% of capable wireless speed. Therefore, putting India on a technologically slum map and pushing backwards India's capabilities and benchmarks, unbecoming and expected from India's so called telecom regulator - TRAI.

The minimum wireless download speed derived by TRAI through an average of current wireless download speed provided by TSP (Telecom Service Providers) is a total farce and arbitrary data, and a pre-determined and pre-decided exercise, to benefit and favor TSPs. Even otherwise, TRAI as the regulator of world's 2nd biggest telecom country cannot just take average of 3rd grade speed currently provided by TSP as benchmark for setting minimum wireless download speed. TRAI needs to set world class benchmarks and not some 3rd grade and 3rd world country benchmarks for a great country like India!

Proposing just 20-25% of the wireless network capable speed (of 2G, 3G and EVDO) as minimum download speed will make India a laughing stock, as India currently being world's 2nd biggest and somewhat mature telecom services country and a wannabe one of the top and greatest country in the world, would have set telecom benchmarks appropriate for a 3rd world under developed country. It seems TRAI's crony backed agenda is to make India a technology slum and a laughing stock.

With 56 Kbps speed, even today's apps and mobile web pages (leave alone or don't even imagine regular webpages) on smartphones won't open properly or will take ages. Only a stone aged WAP website can be used with such low degraded speed. Does TRAI wants to push India and Indians backwards and into the Stone Age?

Hence, I request TRAI to follow global benchmarks and mandate a minimum download speed of 'at least 50% and up to 75% of advertised/wireless network capable speed' (of 2G, 3G and EVDO). **Therefore, on behalf of billion plus Indian citizens, I propose the following:**

GSM 2G or EDGE wireless network is capable of data speed up to 256 Kbps to 296 Kbps - 'Indian Citizens proposed' minimum download speed is 152 Kbps, with successful data transmission download attempts at >95% and average throughput for packet data at >90% of the subscribed speed. Latency should be <200ms.

GSM 3G or HSDPA wireless network is capable of data speed up to 3.6 Mbps to 21.1 Mbps - 'Indian Citizens proposed' minimum download speed is 2 Mbps or 50% in case of higher advertised speed

beyond 3.6 Mbps (e.g. 7.2 Mbps, 14.4 Mbps, 21.1 Mbps etc.), with successful data transmission download attempts at >95% and average throughput for packet data at >90% of the subscribed speed. Latency should be <150ms.

CDMA EVDO wireless network is capable of data speed up to 3.1 Mbps to 4.9 Mbps downlink per carrier - 'Indian Citizens proposed' minimum download speed is 2 Mbps or 50% in case of higher advertised speed beyond 3.1 Mbps (e.g. 4.9 Mbps, 9.8 Mbps etc.), with successful data transmission download attempts at >95% and average throughput for packet data at >90% of the subscribed speed. Latency should be <150ms.

CDMA 1X wireless network is capable of data speed up to 153 Kbps - 'Indian Citizens proposed' proposed minimum download speed is 104 Kbps, with successful data transmission download attempts at >95% and average throughput for packet data at >90% of the subscribed speed. Latency should be <200ms.

In India, GSM 2G/EDGE data speed and tariff is the most abused by telecom operators. Since India is developing country with low per capita, especially rural India, it needs decent 2G EDGE mobile data speed and affordable tariffs. TRAI's proposed minimum data speed of 56 Kbps is the most regressive proposal ever as it's not even 2G or 2nd generation network speed but actually a stone age 1st generation dial-up speed which Indians used to experience some 15-16 years back (In technology, 10 years = 100 Industrial human years!)

Therefore, TRAI's proposed minimum download speed of 56 Kbps for GSM 2G and CDMA 1X needs to be severely condemned for its highly regressive nature which technologically pushes India in the back foot and backwards into stone age and makes India a technological slum! Hence, TRAI needs to mandate a minimum download speed of 152 Kbps for GSM 2G EDGE and 104 Kbps for CDMA 1X to even qualify as decent and humanly acceptable speed.

The exercise to set minimum download speed for wireless is a crony agenda to allow TSPs to legally degrade and lower their speed to TRAI proposed ones, as TSPs will claim to their customers that they are already providing minimum download speed set and mandated by TRAI. For e.g. in 3G and EVDO, the current average speed is 2-2.5 Mbps and TRAI's proposed minimum download speed of 1Mbps for 3G and EVDO will legally allow TSPs to degrade and slow down their speed to 1Mbps as this is the minimum speed they need to adhere to.

Therefore, TRAI also needs to legally mandate an average throughput for packet data at >90% of the subscribed speed and latency of <150ms along with minimum download speed.

2: Should the service provider be mandated to inform the minimum download speed to customers along with each tariff plan? Please give your comments with justification.

The telecom service provider should not only be mandated to provide/advertise 'minimum' download speed to customers but also be mandated to provide/advertise 'maximum' download speed, along with each tariff plan. Both the 'minimum' and 'maximum' speed must be clearly and explicitly mentioned together along with each tariff plan.

There is another unethical and illegal practice of bandwidth throttling for so called unlimited plans. These are anti-people policies and highly condemnable. But TRAI is hand in glove with the telecom companies to throttle consumers. This is one of the most abusive form of cheating customers.

For example, for an unlimited 3G and EVDO data plan, the speed is throttled from 3.6-21.1/3.1 Mbps to an insulting 40-64 Kbps, a mere 1-5% speed! No unlimited wireless data plan (3G and EVDO) should throttle down speed to less than 512 Kbps (same as current broadband definition of TRAI). Because anything less than 512 Kbps cannot be termed as nor be allowed to be advertised or sold as a wireless broadband plan, even for throttled speed. Anything less than 512 Kbps will be a wilful and gross violation of the law, as this is the minimum speed that needs to be provided to consumers to qualify as a wireless broadband plan (3G and EVDO). It's like providing business class seat to customers (3G and EVDO) and then after a time limit, asking customers to sit in a toilet (40-64 Kbps) for the rest of their

journey!

For GSM 2G, no so called wireless unlimited data plan should throttle down speed to less than 128 Kbps. And for CDMA 1X, no wireless unlimited data plan should throttle down speed to less than 100 Kbps. Anything less than 128 Kbps for GSM 2G and 100 Kbps for CDMA 1X will be highly insulting and derogatory for Indian consumers, when compared to worldwide benchmarks.

There is another unethical and illegal practice of bandwidth throttling for certain websites (YouTube, Torrents etc.) which must be totally abolished and punitive action taken in case of violation, because it is against the principles of fair play and natural justice. India is not Paki or China where telecom companies and government can act like soft militants. Customers have paid telecom companies for X amount of data, and therefore it's highly illegal and untenable for telecom companies to decide or throttle consumer's data download based on discriminatory practices.

As mentioned earlier, I don't expect TRAI to act fairly and in the interest of consumers because it is already decided by telecom companies on behalf of TRAI as to what minimum download speed should be and other such related policy matters. The current speed proposed by TRAI is in consultation and confirmation with telecom companies. Thus the current exercise of seeking comments from public is a big farce and meaningless. The only reason I have commented in detail is because I want to place my comments on record. This will act as an evidence to expose TRAI's bias and anti-people policies in the court of law.

Yours Sincerely,
Vipin Madishetty