

Fwd: VOICE Comments on QOS-Wireless Data Services

1 message

A. Robert J. Ravi, Advisor <advqos@trai.gov.in>

To: broadbandpmrqos@gmail.com, sroqos@gmail.com

Mon, May 5, 2014 at 4:37 PM

------ Forwarded message -----From: hupadhyay@consumer-voice.org
To: advgos <advgos@trai.gov.in>

Cc:

Date: Mon, 05 May 2014 15:01:19 +0530

Subject: VOICE Comments on QOS-Wireless Data Services

(a MS-Word copy is also attached.)

To,

Shri A. Robert J. Ravi, Advisor (CI & QoS),

TELECOM REGULATORY AUTHORITY OF INDIA

MAHANAGAR DOORSANCHAR BHAWAN,

JAWAHAR LAL NEHRU MARG, NEW DELHI-110 002

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SUBJECT:VOICE Comments on The draft "Amendment to the Standards of Quality of Service for Wireless Data Services Regulations, 2012"

<u>Voluntary Organisation in Interest of Consumer Education (VOICE)</u> is a consumer protection group set up by teachers and students of Delhi University in 1983.

We at VOICE as part of our advocacy initiative in Telecommunications continuously raise different issues with Policy makers impacting consumers based on the knowledge through Consumer feedbacks.

As a registered CAG we are in forefront of providing inputs to the Government, Regulatory authorities, consumers and business community at large related to consumer concerns and interests.

In continuation of this effort on behalf of consumers we at VOICE have following COMMENTS on The draft "Amendment to the Standards of Quality of Service for Wireless Data Services Regulations, 2012"

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

It is high time that all parameters related to QOS for Wireless Data Services are prescribed and monitored. This probably one the rare product / service where a buyer does not know what he is buying as the ISP will keep on

changing the specification of the service on offer at his whims & fancies even overlooking the basic trade norms. Unless the buyer is told of the specifications of the service being offered how the consumer can demand performance. And the Licensor as well as the regulator has overlooked this basic fact and have not provided a proper definition to all aspects of internet. Obviously the ISPs do not believe in self-regulation as no ISP has defined his offerings clearly. Then there is a misleading sales pitch- "Speed uptoMbps...." which does not guarantee any performance.

So "Minimum Download Speed" must be mandated for every internet plan on offer.

Question 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:

Yes, ISPs should be mandated to specify minimum performance on not only download speed but upload speed as well for each plan. The minimum download speed for wireless data services on technology basis as suggested is one possibility. But it would be preferable if Minimum Download/Upload speeds are linked to the "Upto Speed" being offered by the ISP for each plan. For example if the plan offers "Speed upto 9.1 Mbps", than minimum speed should be say 20% of maximum speed on offer viz. 1.8 Mbps. The justification is that consumer buys a higher speed plan paying higher charges as per his need so he is entitled to services in relation to his pay-out.

There should also be a system for self measurement of Download/upload speed thr' a reference server as per specified process. These reference servers should be provided by the ISPs as well as a independent entity appointed by TRAI.

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