

# Fwd: Regarding Consultation Paper on Amendment to the Standards of Quality of Service for Wireless Data Services Regulations

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

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Date: Thu, 24 Apr 2014 13:15:44 +0530

Subject: Regarding Consultation Paper on Amendment to the Standards of Quality of Service for Wireless Data Services

Regulations Dear TRAI

I really appreciate that TRAI is seeking comments from stakeholders and this is a very valid issue to be discussed and resolved.

Please find my comments on questions raised in this consultation paper :

### Question 1:

What are your views on prescribing benchmarks for minimum download speed as above?

#### Comment:

The criteria proposed is based on technology. I support this criteria, largely because each technology has its own performance and it is introduced and advertised in the country for this performance. Hence service providers must remain committed to provide the same performance as advertised for their different technologies.

The benchmarks must be decided based on technology because they have their own capabilities and their utilization is meaning less if not used according to their capabilities.

Also if you say that minimum speed benchmark is 1 Mbps for 3G, then I fear that all service providers will simply degrade the service to a level such that speed remains near 1 Mbps only. In this way the regular 3G will remain at 1 Mbps. I would request to make the benchmarks as strict as possible and raise the minimum benchmarks, for example in case of 3g, when 3g was introduced in India, 3 Mbps or above bandwidth was advertised by every service provider, hence as a consumer I will definitely expect it running above 2 Mbps at least. 1 Mbps is quite low I feel(only .33% of 3 Mbps).

## Another way of defining benchmark could be defining it as a percentage of the upper limit advertised by service provider.

It can be like minimum speed must be 70% of the maximum speed advertised by service provider.

In this case if a service provider is advertising speed upto 3 Mbps, then the minimum speed will be 70% of 3 Mbps, ie 2.1 Mbps.

This criteria appears to be more apt for high speed technologies like 3g, hsd, evdo etc.

For low speed technologies, the proposed criteria appears to be apt.

#### Question 2:

Should the service provider be mandated to inform the minimum download speed to customers along with each tariff plan?

Comment:

I would not support point 2.5 of this paper. The minimum speed benchmark must not depend on the value of tariff. This will lead to commercialization of speed as well.

Today value of 3g tariff depends only on the volume of data. The minimum speed of 3g must remain uniform for all tariffs of 3g. It must not be like 100 Rs tariff will give 512 Kbps as minimum speed and Rs 200 will give 1 Mbps as minimum speed. This will lead to rise in tariff for the same good speeds that we enjoy today at good price and will be disappointing for consumers.

Although service providers must be mandated to mention the minimum speed with the tarrifs.

I really hope that my views will help in deciding criteria for minimum speeds of data.

Warm Regards Nishant Agnihotri Assistant System Engineer Tata Consultancy Services