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Sub: Response to TRAI Consultation Paper dated 01/06/2017 On Data Speed Under Wireless Broadband Plans – Reg.

Atria Convergence Technologies Private Limited ('ACT') provides broadband services in the cities of Bangalore, Hyderabad, Chennai, Delhi and few other cities in Andhra Pradesh. ACT has been providing wired broadband services using Metro Ethernet based Fiber to Home/ Building Technology (ME-FTTX).

We welcome the Authority's attempt to frame guidelines and regulations through this Consultation paper in order to address the issues concerning data speed through wireless broadband services and transparent communication to customers regarding data speed and usage parameters. We submit that the Quality of service regarding data speed should be monitored and reported from the customer experience perspective rather than service provider reporting from its network point of view to meet the QoS benchmark prescribed by the Authority. We welcome the Authority's move to address this lacuna through this consultation paper and we submit our comments as follows:

- In order to ensure level playing field and customers to make their preferred choice and right decision, all service providers should be mandated to declare minimum guaranteed speed and average speeds to customers for any such broadband connections either through wireless and wired services.
- Information regarding the Minimum guaranteed speed and average speed of rate plans are basic requirement for customers. Quality of Service experienced by the customers has to be shaped by this regulations.
- With convergence of services offered by large wireless service providers, the service providers have to be mandated to provide Minimum guaranteed speed at all times. The service providers have to provide average speed minimum 80% of the times so that the customer can experience quality of service. These should be mentioned in every advertisement, public communication or correspondence of service providers where rate plans are mentioned with prices. Apart from this, these should also be part of QOS reporting and penalties need to be prescribed for compliance failures.
- The lack of communication on minimum performance standards creates lot of confusion among the customers while choosing the broadband plans. Further the lack of transparency in



communication also impacts customer experience since his expectation of QoS is not being met till he chooses to either complain and seek redressal or move to competing service provider.

- Any service provider who is not able to provide minimum speed should not be allowed to call its services as “broadband” - instead the service should be called “mobile internet”. This is in line with the National Telecom Policy 2012 and the same should be implemented in letter and true spirit.
- Monitoring the speed of the wireless broadband connection through tools at device level is not advisable as there are concerns regarding privacy and data security of the customers.

We do not have any other comments than the above and hence are not responding individually to the questions posed in the Consultation Paper.

Thanks and Regards

Atria Convergence Technologies Private Limited.