Date: 17th June 2021

To Shri Sunil Kumar Singhal, Advisor (Broadband and Policy Analysis), Telecom Regulatory Authority of India New Delhi

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SUB: Counter Comments - Supplementary Consultation Paper on Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed, dated 19th May 2021

Respected Authorities,

Inputs on above subject are as follows:

- 1) As per DOT communication, the subject related to fixed line broadband services. Hence "Street Furniture" related topic is not pertaining. If, authorities intended to have inputs on "street furniture" a separate and exclusive consultation paper needs to be released.
- 2) No clear inputs observed on the subject for the following items:
 - a. What is needed for the public living in Rural/Remote/less-populated villages
 - b. For urban consumers there are number of choices to have broadband connectivity, but for the people living in rural/remote villages/etc. areas there is no choice, hence, a separate road-map is required to penetrate broadband for such areas specifically.
 - c. The fixed broadband CPE (Customer premises equipment i.e. Broadband Optical fibre modem) is not having uniform standards. When-ever a customer changing their ISP/service provider, customers need to re-invest to have new CPE. This constraint can be overcome by releasing uniform CPE standards. Such CPEs can manufacture under "Aatma Nirbhar Bharat Abhivan".
 - d. Fixed line broad band is being offered through hanging wires (optical fibres) across lanes/houses and are liable for frequent cuts gives trouble to users and providers. This problem is to be addressed properly.
- 3) BBNL is silent and no inputs found from them who are the major stakeholder for delivery of broadband penetration in India specially remote /rural /villages.
- 4) It seems no data on pending or waiting list of fixed-line broadband applications. Hence, concern authorities needs to maintain monthly or periodical report for fixed-broadband applicants as:
 - a. Number of applications received
 - b. Number of connections provided out of above applications
 - c. Number of applications pending
 - d. Number of applications are in waiting list
 - e. Number of applications are not feasible due to reasons
- 5) All ISPs/Service Providers need to maintain dash-board on their web-site regarding fixed-line broadband applications as above.
- 6) Fixed line broadband service is normally a "Post-Paid" connection. Hence, there will be monthly bill from the ISP/service provider side. Each such bill can include DBT- monthly unique code. Customers who need to have DBT, they can use that code to get it within a pre-defined time frame for that month. This DBT- Monthly Unique code can be generated using a software solution and can be integrated among ISP billing generation system with DBT system.

Regards S S Vas.K