ACT FIBERNET

2nd September 2026

To
The Advisor (QoS-I)
Telecom Regulatory Authority of India
Email Id: advqos1@trai.gov.in

Sub: Response to Consultation Paper on Draft Amendments in 'The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline AND Wireless) Service Regulations, 2024

Dear Sir,

At first, we would like to thank the Authority for the subject mentioned consultation paper, with respect to the comments sought by the Authority on the Draft Amendments in 'The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline AND Wireless) Service Regulations, 2024. We submit our response in the format provided as a Wired Internet Service Provider.

Sl. No.	Para Number of the Draft Notification	Input/Comment/Counter Comment	Justification with Supporting Reference if Any
1	Para 6 (a) – Regulation 9(1)(iv) – Download/Upload Speed	TRAI should permit grouping of tariff offerrings having the same declared typical download/upload speed and reduce the proposed 100% coverage requirement to 75%. Appropriate sampling/tolerance should be permitted for plans with low subscriber base/high speed plans. Alternatively retain current provisions with no changes.	We request the Authority to reconsider the proposed mandates for speed measurements across all tariff plans and instead align them with the established practices under previous guidelines. The current proposal—which necessitates active, granular speed measurement across all plans—is operationally unsustainable for the following reasons: Technical and Financial Feasibility: For high-end plans (e.g., Gigabit speeds), measurements require specialized, high-cost test equipment. It is not economically or technically viable to build such measurement functionality into low-end customer premises equipment (CPE/routers) at scale. Proposal: continue with the earlier DoT proposal since this process is currently manual.
2	Para 6 (a) – Regulation 9(1)(vii)	This proposed regulation is in line with the Direction dated 20.03.2025 issued by TRAI. We have no further comments.	No comments

3	Para - 6(b) – Regulation 9(1)(x) -Addition of MTTR	For calculation of this parameter please consider to working hours from 9AM to 6PM instead of 8AM to 6PM. TRAI should clarify start/stop points for MTTR factoring in safe working hours network access restrictions, force majeure, third-party infrastructure failures and customer unavailability.	TRAI proposes MTTR ≤10 hours for broadband wireline. The methodology is proposed to align with access-wireline MTTR, but FTTH operational realities require explicit exclusions and clock-stoppage rules for reasons beyond reasonable control of ISPs.
4	Para 6 (b) – Regulation 9(1)(xi) – Significant Network Outage	1) Material degradation in service quality needs to be redefined to what is practically measureable and representative instead of speed degradation. It is suggested that this can be redefined as follows: **A)** 20% of the subscribers facing complete service unavailability for the prescribed duration in the LSA (or) **B)** 20% of subscribers raising complaint with the ISPs service ticket related to speed/quality within a span of 4 hours **2)** The 24-hour reporting period should commence only after the ISP objectively establishes that the event meets the prescribed SNO criteria. **3)** TRAI should expressly provide that documented force majeure and external third-party events are excluded from SNO-related compensation and, where appropriate, compliance calculations. 4) TRAI may clarify that "District means the officially notified administrative distict by the respective state govt. The 2nd trigger relating to the percentage of affected subscribers should be assessed with reference to the	We seek a revision to the definition of "Significant Network Outage" (SNO) to ensure that the metrics are objective and measurable based on actual service impact. Current Challenge: Continuous, real-time monitoring of every subscriber's speed to identify a "material degradation" (20% or more speed reduction) is technically unfeasible. Such metrics are subject to numerous variables outside of operator control, making accurate, continuous reporting impossible. Proposed Amendment: We propose replacing the current criterion of "20% of customers facing degradation" with a clear, objective service metric: Proposed Metric: "20% of customers raising a service ticket related to speed/quality within a span of 4 hours." Rationale: This utilizes our established ticketing systems, providing an objective and auditable trigger for identifying significant outages without requiring invasive, continuous, and unreliable background speed monitoring. "Material service degradation" based on a 20% speed reduction is subjective and difficult to establish consistently at subscriber level. Speed can vary due to customer equipment, Wi-Fi conditions, device capability and other factors

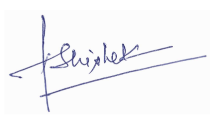
		applicable LSA"	beyond the service provider's network. An objective service-unavailability/outage-based criterion would provide greater certainty and consistency. The draft or even the previous regulation does not define ""District". A uniform definition is necessary for consistent reporting.
5	Para 6 (b) – Regulation 9(1)(xi) – Significant Network Outage	The rebate should apply only to subscribers demonstrably affected by the SNO and should exclude force majeure, customer-side equipment and other excluded events. Double compensation should be avoided. Force majeure events should be excluded from the financial/service-credit consequences of SNO, while such events may continue to be reported separately as required. The proposed mandatory service credit/rebate for outages exceeding 24 hours should be reviewed and suitably qualified, particularly for outages arising from force majeure and circumstances beyond the service provider's control.	Events such as natural calamities and other force majeure circumstances are outside the reasonable control of the service provider and may cause widespread network disruption despite appropriate contingency measures. Automatic compensation in every reported SNO may result in disproportionate financial exposure where the outage is caused by circumstances beyond the service provider's control.
6	Para 6(c) – Explanation under Regulation 9 and 10	We welcome this amendment.	
7	Para 7(a) – Regulation 10(1)(ii) – Billing complaints	The benchmark of resolution of billing/charging complaints within Four weeks may be retained. Alternatively, TRAI may consider a shorter timeline with appropriate exclusions for cases requiring detailed investigation, third-party reconciliation or customer intervention. A practical resolution timeline	Billing and charging complaints may require reconciliation across billing, CRM, payment and provisioning systems. A blanket one-week resolution requirement may not be operationally feasible for complex cases and could adversely affect the quality of resolution.

		should be retained, with appropriate treatment for complex complaints requiring investigation.	
8	Para 8 – Regulation 15(1)(e) – QoE Score	We request, TRAI to clarify methodology, weightages, data sources, sample size and validation methodology for QoE Score. Wired broadband service providers should have an opportunity to review/represent against material data inaccuracies before publication.	The proposed QoE Score combines network performance, consumer service and consumer perception. Transparency is essential because it combines objective and subjective inputs.
10	Para 9– Regulation 16A – False compliance report	We request the authroity to refer our comments agaisnt Regulation 16B herein below for this comments as well. Further we propose specific comments agaisnt this proposed reugulation 16A as follows: Regulation 16A should distinguish deliberate false reporting from inadvertent, technical or computational errors. A data mismatch exceeding 1% should not automatically be classified as false reporting without considering its cause and materiality. Genuine data-processing errors should not automatically be treated at par with deliberate falsification. Minor differences may arise from rounding off, data refreshes and system reconciliation in large PMR datasets. Regulatory consequences should be linked to materiality and intent.	The proposed financial disincentives under Regulations 16A, 16B and 17 apply uniformly to all service providers. 1. Telecom service providers differ substantially in subscriber base, revenue, geographical presence and financial capacity. 2. Large integrated telecom operators serve several crore subscribers, whereas standalone wired ISPs may have substantially smaller subscriber bases. 3. Imposing the same financial disincentive on both categories would have a disproportionately severe impact on standalone and regional ISPs. 4. Equal monetary penalties do not necessarily result in proportionate regulatory treatment. 5. TRAI should introduce a graded financial-disincentive framework based on the category and scale of the service provider. 6. Relevant criteria may include

11	Para 9 – Regulation 16B – 1% discrepancy threshold	We suggest TRAI to implement Proportionate financial disincentives modle i.e., Financial disincentive may be prescribed based on the size, Market share and other aspects of the Service providers basis the justification provided herein.	subscriber base, relevant service revenue or AGR, geographical operations and number of subscribers affected. 7. The amount should also consider the nature, seriousness and duration of the non-compliance. 8. Separate penalty slabs may be prescribed for large access service providers, standalone wired ISPs and smaller or regional ISPs. 9. Higher financial disincentives should be reserved for deliberate, material or repeated violations. 10. The service provider's compliance history and corrective measures should be considered while determining the penalty. 11. A proportionate framework would ensure effective deterrence without imposing an excessive or inequitable burden on standalone wired ISPs.
12	Para11 – Regulation 17 – Late compliance report	No comments	No comments
13	Para 12 – Regulation 17A	No comments	No comments
14	Para 13 – Regulation 18	No comments	No comments
15	Schedule-I – Complaint registration during outage	No comments	No comments

16	Overall – Implementation date	TRAI should provide an adequate implementation/transition period for new parameters like 1. Tariff offerings in which 90th percentile value of measured download and upload speed is ≥ offered typical download and upload speed - 100% 2. Significant Network Outage reporting and rebate to customers. 3. MTTR 6 months from the date of notification etc.	The draft proposes amendments from 1 October 2026. Several provisions require changes to NOC, CRM, billing, analytics and PMR systems.

Thanking you,
For Atria Convergence Technologies Ltd



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