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Shri Tejpal Singh,
Advisor (QoS-I),
Telecom Regulatory Authority of India,
New Delhi.

BIF's Counter - Comments on the TRAI's 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 dated 5 August 2026

Dear Sir,

Greetings from Broadband India Forum (BIF) – "A Think-Tank for Digital Transformation".

With reference to TRAI's Consultation Paper dated 5 August 2026 on the proposed amendments to the Standards of Quality of Service of Access and Broadband Services Regulations, 2024, we are pleased to submit BIF's counter-comments for the Authority's consideration.

We request the Authority to kindly take the enclosed counter-comments on record and consider BIF's views while finalising the proposed amendments.

With regards,

Yours sincerely,



T.V. Ramachandran,
President,
Broadband India Forum

BIF's Counter-Comments on the 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

Preamble: BIF commends TRAI for initiating the consultation process on the draft amendments to the *Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024*. The proposed amendments are timely, particularly in view of the rapid deployment of 5G networks and the emergence of advanced network capabilities such as network slicing.

BIF believes that network slicing is an important technological advancement that can support diverse use cases requiring differentiated performance characteristics, including enhanced mobile broadband, ultra-reliable low-latency communications, and enterprise and industry-specific applications. In BIF's view, network slicing can coexist with India's net-neutrality framework, provided that its deployment is transparent, non-discriminatory, and does not adversely affect the quality or availability of general internet services for ordinary users.

With these preliminary observations, BIF seeks to highlight and respond to certain concerns raised by stakeholders in their submissions to TRAI's Consultation Paper.

Counter Comment 1.

A few stakeholders have demanded that:

1. TRAI should expressly recognise network slicing and Quality-on-Demand as legitimate capabilities of current and future networks.
2. As part of differentiated connectivity, Quality on Demand be provided for applications such as live video streaming, cloud gaming, and live broadcasting and enterprise applications requiring assured speed, latency or reliability;
3. Through Quality-on-Demand network APIs, operators can provide application developers with guaranteed connectivity levels as and when they are needed.

BIF's Counter Comments:

BIF wishes to point out that the above views are not in consonance with the core principles of Net neutrality.

As per the above comment, it suggests that different Apps / Sites (URL) can be given differential speeds and terms for access by a TSP. Implications of this could be:

- a. If a telecom operator offer an OTT platform- guaranteed bandwidth, lower latency or fewer interruptions for live broadcasting event (cricket match or music show, etc) or other premium content to those consumers who are in Fastlane, then it amounts to content discrimination.
- b. Further, to be able to do this, the telecom operator could possibly charge the OTT platform for that special treatment. In such a case, it begins to resemble paid prioritization of 'selected content'.
- c. A platform that does not pay such a charge, could remain on the ordinary internet lane and perform less well during congestion.

This content discrimination is not allowed as per the current Net Neutrality Rules.

In view of the clear and definite reasons and rationale, BIF is of the following opinion:

- The above is a violation of the Net neutrality guidelines which prevents paid prioritization on the basis of selected content.
- It may be pertinent to point out that though Europe has also implemented QoS within 5G network slicing, it is permitted within strict net-neutrality safeguards. Regulators, broadcasters and streaming services have opposed any arrangement that allows telecom operators to charge content providers, prioritise selected services or degrade ordinary internet access. The stakeholder submission mentions European-style use cases without acknowledging these accompanying safeguards.

Counter Comment 2.

Para 4.a (Sub-regulation 6.1.xiv) Tariff offerings in which 80th percentile value of measured download and upload speed is $\geq$ offered typical download and upload speed for 4G/5G technology (Benchmark 100%).

Several stakeholders have countered declaration of typical speed as technically infeasible.

BIF Counter Comments:

We are of the opinion that the download and upload speed experienced by a customer is dependent upon various parameters like distance of customer from BTS, vegetation, type of cluster, weather conditions etc, which are beyond the control of the Operators. As per the terms of the current CP, TRAI has allowed the TSPs to lay down the typical speed for each slice / tariff plan. Our view is that if inclusion of typical speed is meant to enable a subscriber to make a choice, then in the absence of what typical speed implies, it would be difficult for the customer to visualize as to what would be the speed he would get. Therefore, we feel that there is a need to lay down an unambiguous definition of typical speed to avoid multiple interpretations. Further, the definition must accommodate various factors like day time/peak hour, location with respect to the cell site etc, so that it is possible for the service providers to comply the regulations.

Counter Comment 3.

Para 6.c(Explanation to Sub-Regulation 2 of regulation 99)-

Some stakeholders have said that **Fixed Wireless should continue to be included in fixed broadband Services and not deleted as proposed in the Consultation Paper.**

BIF Response:

We are of the opinion that proposed amendment should be retained. The amended classification of TRAI may be continued as Fixed Wireless has same issues as other cellular connections and guaranteed speeds cannot be offered like fiber-based plans. The QoS is probabilistic in FWA while in Fiber based it is deterministic. Thus, both cannot be equated from QoS perspective. Therefore, we feel that FWA should not form part of the Fixed Broadband for purposes of explanation to sub regulation 2 of regulation 9.