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TRAI/FY26-27/61
15th September 2026

Shri Tejpal Singh
Advisor (QoS – I)
Telecom Regulatory Authority of India,
World Trade Centre, Nauroji Nagar,
New Delhi – 110029

Subject: Bharti Airtel's Counter Comments on 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'*

Reference:

1. TRAI's Consultation Paper dated 05th August 2026.
2. Airtel's Response to the Consultation Paper dated 2nd September 2026.

Dear Sir,

This is in reference to **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 05th August 2026.**

In this regard, please find enclosed our counter comments to the consultation paper for your kind consideration.

Thanking You,

Yours Sincerely,
For Bharti Airtel Limited

A handwritten signature in blue ink, appearing to read 'Rahul Vatts'.

Rahul Vatts
Director Corporate Affairs
&
Group Chief Regulatory Officer

Encl: a.a

1. At the outset, Airtel reiterates its submissions made in the main comments ***dated 02.09.2026*** on TRAI's Consultation Paper on Draft Amendments to the Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024.
2. Airtel remains fully committed to the Authority's objective of protecting consumer interests, strengthening transparency and ensuring sustained improvement in service-quality outcomes. However, Airtel submits that any further evolution of the QoS framework must remain firmly anchored in the operational, technical and implementation realities of modern telecommunications networks, and must be outcome-oriented, technology-neutral, objectively measurable, statistically representative, proportionate, causally attributable and practically implementable.
3. In respect of slicing safeguards, Airtel emphasizes that modern 5G and future networks require operational flexibility for efficient spectrum utilization, dynamic capacity management, rapid restoration, network slicing, Quality-on-Demand and differentiated enterprise and public-service use cases. Prescriptive controls over PRB utilization, network design or slice creation, or punitive treatment of model-based and inherently variable indicators, would not constitute an effective consumer safeguard. The appropriate regulatory safeguard is a clear obligation that general internet access continues to meet applicable consumer-facing QoS standards, supported by proportionate transparency, reliable evidence, objective attribution, due-process safeguards and targeted regulatory intervention only where material consumer harm is demonstrated.
4. In particular, Airtel submits that compensation under the Significant Network Outage framework should remain confined to objectively verifiable, material and TSP-attributable outages, and should not be extended to service degradation, throughput variation or performance fluctuation, as such expansion may create substantial implementation, attribution and dispute-resolution challenges without commensurate consumer benefit. Airtel also maintains that coverage maps are predictive engineering models and should continue to be treated as transparency and disclosure tools; any accuracy benchmark linked to compliance consequences or financial disincentives would be premature unless supported by a standardized, vendor-neutral, statistically robust and independently auditable validation methodology. Further, Airtel opposes public QoES-based operator rankings or comparative publication until there is complete clarity on methodology, validation, auditability, attribution, normalization, data access and operator review and correction rights, since an unvalidated composite score may have disproportionate reputational and regulatory implications.
5. **Airtel accordingly submits that the final framework should retain proven, customer-facing and statistically representative QoS benchmarks; avoid zero-tolerance obligations for inherently variable parameters; refrain from converting predictive models, internal engineering metrics and granular technical indicators into strict compliance obligations; and subject any new or evolving KPI to consultation, pilot validation, non-financial monitoring and adequate transition before any binding consequence is imposed.**

Our counter comments made herein are in response to comments provided by one of the stakeholders in reference to technology-neutral framework for network slicing.

In the remainder of this document, Airtel provides its counter comments:

A. Network Slicing is a distinct 5G capability and must not be treated as Technology-Agnostic QoS

One of the stakeholders has advocated that regulatory framework w.r.t. network slicing should be technology-neutral and focus on consumer outcomes rather than prescribing specific technologies or network implementations. The objective of QoS regulation should be to protect consumer interests through service quality, awareness and transparency, while allowing service providers the flexibility to adopt the most efficient technological solutions. Accordingly, differentiated QoS and service experiences should be permitted irrespective of whether they are delivered through 4G, 5G or any future technology.

Airtel Counter Comments:

1. Airtel strongly submits that the stakeholder's position is fundamentally misplaced to the extent it seeks to equate ordinary technology-neutral QoS differentiation with network slicing. While QoS regulation may justifiably remain outcome-oriented and technology-neutral for general consumer-facing parameters, such neutrality cannot be read to mean that technologically distinct capabilities must be treated as interchangeable. Network slicing is not merely a commercial label for differentiated speeds, tariff tiers or priority treatment; it is a specific 5G architectural capability involving the creation and management of logical network instances over shared infrastructure with defined service, resource and performance characteristics.
2. This distinction is not semantic; it is material to the regulatory framework. Conventional QoS differentiation, including bearer-level prioritization, APN policies, traffic management or tariff-linked service differentiation, may exist across 4G, 5G or future technologies. However, these mechanisms do not, by themselves, create a network slice. Treating such mechanisms as equivalent to network slicing would blur the boundary between ordinary QoS management and a dedicated 5G capability, creating regulatory ambiguity, consumer confusion and avoidable compliance uncertainty.
3. Network slicing is purely a feature of 5G technology and not 4G. Accordingly, any differentiated service treatment on 4G cannot be characterized as network slicing and would be discriminatory. This position has been further endorsed by TRAI's own regulatory analysis during earlier 4G priority offerings, which reinforces the need to distinguish ordinary QoS differentiation from genuine 5G network slicing.
4. The past regulatory precedent reinforces Airtel's position. In 2019 and 2020, few Indian TSPs offered to provide differentiated service benefits on 4G networks, including priority treatment and faster speeds for eligible customers. These offerings were implemented within the 4G-LTE framework through differentiated QoS treatment and were thereafter subjected to TRAI's scrutiny on grounds including non-discrimination, transparency and potential impact on other users. The fact that such 4G differentiated QoS offerings were launched but subsequently withdrawn demonstrates that even ordinary priority treatment on 4G has historically required regulatory caution and cannot be casually re-characterized as network slicing.

5. The precedent therefore cuts against, rather than supports, the stakeholder's argument. If differentiated QoS on 4G itself raised issues of transparency, non-discrimination and impact on other users, it would be legally and technically untenable to use that precedent to dilute the regulatory treatment of genuine 5G network slicing. The appropriate conclusion is the opposite: ordinary differentiated QoS should continue to be governed through general QoS, tariff transparency, consumer protection and non-discrimination safeguards, while network slicing should be addressed separately as a distinct 5G capability.
6. TRAI's own regulatory treatment confirms this position. In its April 2022 recommendations on auction of spectrum in frequency bands identified for IMT/5G, TRAI specifically recognized network slicing as part of the 5G private-network and enterprise-service framework and recommended that specific provisions should be made in the license for such use cases. The subsequent UL amendment flowed from this recognition. This regulatory history shows that network slicing was not treated as a generic, technology-agnostic QoS feature, but as a fundamental 5G service-enablement use case requiring distinct licensing and regulatory recognition.
7. Accordingly, the framework must maintain a clear and enforceable distinction. General QoS parameters may remain technology-neutral and may apply across access technologies. However, any network-slicing-specific obligation should apply only where a TSP actually creates and manages a network slice with corresponding resource, service or performance commitments in a 5G network. Extending such obligations to 4G merely because 4G can support differentiated QoS would be technically unsound, regulatorily disproportionate and contrary to the very basis on which network slicing was recognized in the 5G framework.
8. Airtel strongly submits that the principle of flexibility cannot be expanded to erase substantive technical distinctions between fundamentally different service capabilities. Differentiated QoS on 4G and genuine network slicing on 5G operate at different levels of network capability and regulatory significance. Treating them as a single technology-neutral category would risk imposing network-slicing obligations on conventional 4G QoS mechanisms where no slice is created, while simultaneously diluting the regulatory treatment of actual 5G slicing by reducing it to ordinary priority handling. Such an outcome would be technically incorrect, regulatorily imprecise, and contrary to the twin objectives of promoting innovation and ensuring transparent, non-discriminatory consumer safeguards.
9. **In summary, the stakeholder's formulation should be rejected insofar as it treats differentiated QoS and network slicing as interchangeable. The correct regulatory position is that ordinary differentiated QoS, whether on 4G, 5G or future technologies, may be addressed through existing outcome-based QoS, tariff transparency, consumer-protection and non-discrimination obligations. Network slicing, however, remains a distinct and fundamental 5G architectural capability and should be dealt separately only when genuine network slices are created and managed. This approach preserves technology neutrality where it is appropriate, while ensuring regulatory precision where the capability being regulated is inherently technology-specific.**

In summary, we reiterate below:

1. **PRB Utilization & Network Slicing:** Drop proposed PRB KPI, cell-level threshold & prior-intimation requirement, continue assessing established customer-facing QoS indicators, & permit dynamic network slicing subject, if necessary, to limited post-facto reporting.
2. **Coverage Maps:** Drop proposed accuracy KPI & financial disincentive & retain coverage maps solely as transparency disclosures. If verification is retained, first establish standardized methodology covering tolerances, exclusions, audit and dispute resolution.
3. **Mobile Significant Network Outage (SNO) & Rebates:** Retain district-level SNO framework & delete proposed LSA subscriber trigger. If rebates are retained, TRAI to base them on objective & verifiable criteria, material outage duration & established TSP attribution, with appropriate exclusions for events beyond the TSP's reasonable control.
4. **Wireline SNO based on Throughput Degradation:** Drop proposed speed-degradation trigger & related reporting & compensation provisions, & to confine SNO obligations to objectively identifiable, material & TSP-attributable service outages.
5. **Wireless Broadband Speed Disclosures:** Permit publication of technology-wise typical upload & download speed ranges at the network level, retain quarterly statistically representative assessment, drop tariff-wise and 100% compliance requirements, and exclude factors beyond TSP's reasonable control.
6. **Silence Call Rate:** Drop proposed KPI at this stage; instead conduct TRAI-led TSP/OEM pilot to standardize methodology & exclusions; any future benchmark initially be introduced only for non-financial monitoring.
7. **Wireline Broadband Speeds: 100% Tariff Plan Speed Benchmark:** Retain 90th-percentile benchmark and representative sampling, standardize test conditions, exclude factors beyond TSP's reasonable control, and avoid penalties for isolated measurements that do not demonstrate sustained, TSP-attributable degradation.
8. **Wireline MTTR:** Withdraw proposed mandatory benchmark & retain existing framework. If MTTR data is collected, TRAI should use it initially only for monitoring, with appropriate exclusions.
9. **Billing Complaint Resolution:** Retain existing 28-day period, avoid zero-tolerance standard, & subject any future reduction to evidence-based impact assessment with appropriate safeguards for complex cases.
10. **Wireline Reporting Disaggregation:** Retain aggregated reporting where systems and customer accounts are common & to continue classifying 5G FWA under access service (wireless).
11. **Quality of Experience Score:** Drop proposed publication clause and continue relying on objective QoS measures. Any future QoE framework should be introduced only after consultation, pilot testing, independent validation, access to underlying data and correction safeguards.

12. **Financial Disincentives & Reporting:** Drop proposed Regulations 16A & 16B, retain existing ₹5,000 per report per day framework subject to ₹10 lakh cap, & preserve reconciliation, correction, representation & proportionate escalation safeguards.
13. **Interest on Financial Disincentives:** Interest should apply only to undisputed amounts remaining unpaid after final determination and due notice, with no accrual during a genuine review or dispute.
14. **Implementation Timeline – 1st October 2026:** Provide glide path from the issuance of final specifications, constitute TRAI–TSP–OEM implementation group, permit sandbox testing and parallel reporting, and allow initial correction window without financial consequences. Also, while an adequate implementation glide path may address system-development and operational-readiness requirements, it cannot remedy proposals that are inherently incapable of objective implementation. The proposed coverage-accuracy, silence-call and 10% subscriber-impact requirements suffer from fundamental measurement and attribution gaps. There is no validated ground truth for coverage maps, existing OSS platforms lack standardized counters and OEM support for silence-call measurement, and networks cannot reliably identify subscribers affected by the proposed outage trigger. These requirements should therefore be reconsidered and dropped, rather than merely deferred through a longer implementation timeline.
