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27th August 2026

To,

Advisor
(QoS-I), TRAI
New Delhi.

Sir/Madam,

**Sub:- 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**

We are a registered CAG of TRAI for the state of Karnataka.

We are attaching our comments on the consultation paper for your perusal and consideration.

Thanking you,

Yours Sincerely,

GOPAL RATNAM V
Secretary

COMMENTS ON
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

A. Introduction

At the outset, we wish to **appreciate TRAI for the clear progression towards a more consumer-centric philosophy of Quality of Service (QoS) regulation**. The proposed amendments demonstrate an important shift from a framework principally concerned with whether service providers comply with prescribed technical/network parameters towards a framework increasingly concerned with **what quality consumers actually experience, what quality is represented to consumers, whether that representation is accurate, and whether it can be independently verified**.

Hence, we welcome the proposed recognition of **Quality of Experience (QoE)** as an explicit regulatory concept. The proposal to publish a service-wise QoES based on network performance, consumer service and consumer perception represents an important conceptual development. It recognises that telecommunications quality cannot be adequately captured by network parameters alone. Ultimately, the relevant question is whether the subscriber is able to **make and receive calls reliably, obtain the data speeds reasonably represented to them, access the network where coverage is indicated, obtain timely fault repair and receive effective customer and grievance services**.

The proposed framework for **significant network outages and rebates to affected subscribers** is another important step towards making QoS regulation more outcome-oriented. The proposal provides for proportional rent rebates to post-paid subscribers and extension of validity for prepaid subscribers where a significant outage exceeds 24 hours. We regard the principle of linking regulatory QoS obligations with a tangible consumer remedy as particularly welcome.

At the same time, our comments proceed from the principle that **the ultimate purpose of QoS regulation is not merely to secure compliance by service providers but to secure the consumer's right to reliable, transparent and reasonably predictable telecommunications service**. In our assessment, the present Consultation Paper takes the regulatory framework significantly closer to that objective, but there remain opportunities to complete this transition. In particular, we believe that the framework should progressively address persistent QoS deficiencies, strengthen automatic consumer remedies, ensure that published coverage reflects actual service performance and not merely signal strength, enhance consumer participation in validation of provider claims, and ensure that financial disincentives for non-compliance ultimately contribute to consumer welfare.

Accordingly, our detailed comments that follow **support the broad direction of the proposed amendments while suggesting specific modifications wherever necessary to strengthen their effectiveness from the subscriber's perspective**. We have considered

each proposed amendment not only in terms of technical feasibility and regulatory compliance, but against four fundamental consumer principles:

1. **Accuracy** – the quality represented to the consumer should correspond to the quality actually delivered;
2. **Transparency** – consumers should have meaningful and understandable information before and during their subscription;
3. **Accountability** – service providers should be independently verifiable and accountable for QoS failures; and
4. **Effective remedy** – where prescribed or promised service quality is not delivered, the affected consumer should have a simple, timely and, wherever possible, automatic remedy.

B. Inputs/ comments/ counter-comments on Specific Draft Regulations

SN	Para number of Draft Notification	Input/Comment/Counter-comment	Justification with supporting reference, if any
1	Para 3 Reg. 4(1)(ii)	The denominator should preferably be, Average number of active subscribers during the assessment month rather than simply the subscriber count at the end of the period.	It is a good practice in Statistical analysis where there is variation in data over a time period the average is preferred instead of the end of period figures. Otherwise, rapid subscriber growth or contraction could distort the QoS result.
2	Para 4 Reg. 6(1)(iv)	Rebate to the subscribers for significant network outages of more than 4 hrs.	It is fair Compensation should begin after 4 hours, not only after 24 hours, as the consumer loss/harm begins from the start of the outage itself.
3	Para 4 Reg. 6(1)(xiv)	Proposed benchmark becomes 100% of tariff offerings. Strongly Support. But need to define “typical Speed” clearly.	But "typical speed" should be objectively defined and independently verifiable, so that the customers right to information is protected.
4	Para 4 Reg. 6(1)(xv)	Strongly Support. However the 80% threshold should automatically trigger capacity augmentation. Persistent congestion should require consumer notification.	Currently there is no action being triggered and it is left to the Service Provider's discretion. In light of Consumers' right to information, there is a need to be notified.

SN	Para number of Draft Notification	Input/Comment/Counter-comment	Justification with supporting reference, if any
5	Para 4 New Reg. 6(3)	Good preventive regulation. It can stop new slices from degrading ordinary users' capacity. We support, with the addition that the existing subscribers' committed QoS shall not be degraded.	This explicit elaboration is an necessary consumer protection measure to prevent existing consumer dissatisfaction.
6	Para 5 Reg. 7(1)(vii)	New Silence Call Rate $\leq 1\%$ is a Strong consumer benefit because calls can technically remain connected while audio is absent. Require silence-call performance to be published and included in customer QoE reporting	Protects the Consumers' right to information based on which can exercise their right of choice.
7	Para 6 Reg. 9(1)(iv)	Support this modification as every tariff offering is brought under the compliance test. For consumer protection, actual distribution should also be published, not only the percentile.	As there could be subscribers who would be adversely affected which the measure would not reveal.
8	Para 6 Reg. 9(1)(vii)	Suggest that the denominator to reflect the average subscriber base during the assessment period, rather than only subscribers at the end.	It is a good practice in Statistical analysis where there is variation in data over a time period the average is preferred instead of the end of period figures. Otherwise, rapid subscriber growth or contraction could distort the QoS result.
9	Para 6 Reg. 9(1)(xi)	Compensation should be mandatory and automatic.	Important because fixed broadband outages can substantially disrupt work, education and digital services and cause immense consumer harms.
10	Para 8 Reg. 15(1)(e)	Support this consumer-oriented proposal. Further, 3 components of the Network Performance Score, Consumer Service Score and Consumer Perception Score, should also be published in addition to the overall score.	A single composite number can conceal poor performance in one important dimension by allowing it to be offset by good performance in another. Publishing component scores would make the system transparent and meaningful to consumers.

SN	Para number of Draft Notification	Input/Comment/Counter-comment	Justification with supporting reference, if any
11	Para 8 Reg. 15(3)	Agree with this measure as it strengthens standardisation and transparency. However, suggest that there be open consultation to ensure that stakeholders have an opportunity to comment before material changes are made through directions/orders	Any changes made would impact the Consumers' experience and in interest of fairness and consumer right to information.
12	Para 9 Reg. 16(1)	Welcome it, as it strengthens enforcement. We suggest that graduated penalties based on subscriber base, revenue and seriousness/repetition of violation be introduced.	The current amount of Rs one Lakh is not sufficiently high to act as a deterrent for large TSPs. Further the nature of violation should determine the financial disincentive. Serious harms should have higher penalty.
13	Para 11 Reg. 17(1)	Useful deterrent against prolonged non-reporting. But penalties should accrue automatically from the due date, not after three months.	Such clauses indicate that the regulator is not serious about the due date. This would mean effectively that TSPs have 3 months after the due date and they will habituated to submit the reports beyond the due date.

GOPAL RATNAM V
Secretary