

**CONSUMER PROTECTION ASSOCIATION
HIMMATNAGAR
DIST.: SABARKANTHA
GUJARAT**



**COMMENTS ON
DRAFT AMENDMENTS IN 'THE STANDARDS OF QUALITY OF SERVICE OF
ACCESS (WIRELINE AND WIRELESS) AND BROADBAND (WIRELINE AND
WIRELESS) SERVICE REGULATIONS, 2024'**

Executive summary

We support the direction of TRAI's proposed amendments, but recommend material modifications in several areas before final notification. The Consultation Paper correctly identifies that modern telecom regulation must move beyond nominal network availability toward actual consumer experience, reliable coverage information, realistic speed disclosure, outage accountability, timely repair, transparent quality scoring and safeguards around 5G network slicing. The proposed additions on coverage-map validation, significant network outages, automatic/system-generated fault tickets, technology-wise typical speeds, broadband MTTR, billing complaints and QoES are therefore strongly consumer-relevant.

The strongest proposal is the move from merely requiring publication of a coverage map to requiring **≥98% accuracy**, graded coverage levels,

independent validation, consumer feedback and API-based data sharing. However, the proposed validation formula has an important asymmetry: a sample is treated as inaccurate only where the operator's published coverage is **better** than measured; systematic understatement is counted as accurate. More importantly, accuracy is proposed at LSA level across technologies, which could allow large volumes of accurate 4G samples to mask materially inaccurate 5G, rural or district-level claims. BEREC's consumer-information framework emphasizes relevant, comparable and accurate coverage information; the FCC separately maps technologies and service levels and allows consumer challenges; and the CRTC-commissioned 2025 review recommends technology-level predictions, standardized grids, independent validation and interactive public access. [1]

TRAI should therefore retain the 98% objective but require reporting **separately by technology and urban/rural category**, publish minimum validation sample requirements and confidence levels, and distinguish overstatement, understatement and overall classification accuracy. Crowdsourced data should be used primarily for identifying problem areas and QoE unless TRAI first validates device/environment normalization; the CRTC study notes that regulators generally regard uncontrolled crowdsourced measurements as more useful for QoS and end-user experience than direct signal-strength validation. [2]

The typical-speed amendments are directionally correct but create a potentially serious **gaming risk**. TRAI itself records that measured speeds have sometimes been **10–20 times declared typical speeds**, indicating that

operators may declare very conservative “typical” values. Yet the proposal leaves operators free to decide those values. A 100% compliance requirement is of limited consumer value if the reference commitment can be set artificially low. TRAI should prescribe a methodology for deriving typical speeds from actual busy-period measurements and require point-of-sale disclosure of typical download/upload speed, busy-period range and, for fixed broadband, an individualized or plan-level minimum service threshold. Ofcom’s broadband-speed framework provides a useful precedent: estimated peak-hour speeds, a minimum guaranteed speed and a right to exit where persistent speed problems cannot be fixed. [3]

There is also a statistical-drafting issue. Calling a value the “80th percentile” or “90th percentile” **after arranging observations in descending order** reverses normal percentile intuition. TRAI should state the intended consumer proposition directly: for example, *“a speed that at least 80% of valid wireless measurements equal or exceed”* and *“a speed that at least 90% of valid wireline measurements equal or exceed.”* This would remove ambiguity without changing TRAI’s intended protection.

The SNO proposals should be strengthened. A district-wide outage is clearly significant, but the alternative wireless trigger of more than 10% of an entire LSA can miss severe localized outages affecting a city, town, rural cluster or several lakh consumers while remaining below 10% of a large LSA. The same concern applies to wireline “Service Area” aggregation. **Evidence presently available in the Consultation Paper is insufficient to select a scientifically optimal lower numerical threshold. TRAI should therefore publish the**

distribution of outage events by affected subscribers, geography and duration, and introduce a district/cluster/subscriber-count trigger in addition to the LSA/Service Area trigger.

Consumer compensation should become genuinely automatic. The draft itself recognizes the principle by requiring affected subscribers either to retain complaint-registration access or to be automatically mapped to system-generated fault tickets. Once the network already knows which cells, access nodes or subscribers have failed, the consumer should not have to prove the same failure again. Ofcom's fixed-service scheme demonstrates that automated compensation is operationally feasible: after the qualifying condition is met, participating providers credit customers without a further compensation request. [4] TRAI should expressly require automatic mapping, notification and compensation for network-detected qualifying outages, with equal economic protection for pre-paid and post-paid users.

The proposed 5G network-slicing provisions are an appropriate intervention at the right stage of network evolution. Nevertheless, **PRB utilization is a congestion indicator, not a complete consumer-protection test.** QoE may deteriorate because of backhaul, transport, core-network, scheduler, latency, packet-loss or slice-policy constraints even where radio PRB utilization remains below 80%. TRAI's own Explanatory Memorandum recognizes radio and backhaul capacity planning and equal treatment considerations, but not all of those safeguards appear in the operative text. BEREC's June 2026 draft guidance is particularly relevant because it applies differentiated-QoS principles technologically neutrally to 5G slicing, analogous mechanisms in 4G

and fixed networks, and future 6G architectures. [5] TRAI should therefore make the core rule outcome-based: **a commercial slice must not materially degrade the availability or general QoS of ordinary internet access**, and the assessment should include radio, backhaul, latency, packet loss and throughput.

Future-proofing is important because 3GPP Release 18 already extends 5G-Advanced into areas including integrated satellite/NTN access, while Release 19 continues 5G-Advanced evolution; ITU has already established the IMT-2030 framework and is progressing technical requirements toward future 6G standardization. [6] Accordingly, TRAI should regulate **consumer outcomes rather than generation labels wherever possible**. Consumers must retain one accountable retail service provider even where connectivity is assembled through FWA, network slicing, MVNO/wholesale arrangements, neutral-host infrastructure, cloud core, NTN/satellite links or future programmable networks.

Finally, implementation should be phased. The draft proposes commencement on **1 October 2026**, while stakeholder comments are due 26 August and counter-comments 7 September. Immediate consumer-right measures—billing timelines, complaint access, outage notification and truthful reporting—should not be delayed. New GIS/API architecture, revised statistical methodologies and QoES, however, should use controlled implementation periods, test datasets and technical sandboxes. This protects consumers from rushed or erroneous implementation while avoiding disproportionate compliance costs that could discourage smaller providers.

The CRTC-commissioned review specifically records the software, skills and resource burden that highly granular coverage modelling can impose on smaller operators and recommends targeted support rather than weaker consumer standards. [7]

The attached Draft Notification contains substantive text for each main paragraph **1 through 15**; accordingly, the requested fallback wording “Paragraph text not provided; evidence insufficient” is not required for any main paragraph.

TRAI-prescribed paragraph-wise submission:

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
1	Para 1(a) — Short title	SUPPORT. No substantive consumer objection.	Benefit: Provides legal clarity. Safeguard: Final notification should retain a clear consolidated title and TRAI should simultaneously publish a clean consolidated version of the 2024 Regulations incorporating the amendment, so consumers and smaller providers are not required to reconcile multiple instruments. The Consultation Paper itself provides a consolidated Annexure-IV for ease of reference.
2	Para 1(b) — commencement on 01.10.2026	SUPPORT WITH MODIFICATION . Retain 1 October 2026	Benefit: Rapidly introduces needed consumer safeguards. Risk: A uniform commencement date gives limited time after consultation for

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		for provisions that can be implemented immediately, but phase technically substantial new obligations.	new GIS grids/APIs, validation systems, slicing reports and QoES methodologies, creating error and compliance-cost risks. Alternative: Billing complaint timeline, complaint accessibility, truthful reporting and outage notification: 01.10.2026. Revised speed methodology/slicing reporting: within 3–6 months. Full Schedule-III validation/API enforcement and QoES: 6–12 months after final technical specifications. Safeguard: No postponement of existing consumer rights.
3	Para 2 — definition of PRB	SUPPORT WITH MODIFICATION . Define PRB by reference to the applicable TEC/3GPP technical specification rather than relying solely on a static explanatory definition.	Benefit: Creates clarity for the proposed congestion metric. Risk: Static engineering definitions can age as radio architectures and measurement conventions evolve. Alternative: “PRB shall have the meaning assigned in the applicable TEC/3GPP specification, as adopted or updated by the Authority.” Future-readiness: 3GPP specifications remain under continuing change control; TS 23.501, for example, remains a maintained 5GS architecture specification. [8] The Consultation Paper itself relies on

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			TEC/3GPP performance-measurement specifications for PRB utilization. Primary TEC reference: https://tec.gov.in/pdf/3gpp/TSDSI_Doc_1657/rel17/TS-28.552%20V1.8.0.pdf
4	Para 3 — fault incidences per 100 subscribers/month	Comment (Support with refinement): The shift to “Fault incidences (No. of faults per 100 subscribers/month)” and the revised formula is welcome for consumer transparency. However, TRAI should mandate disaggregated reporting by geography (urban/rural, district-wise) and technology (FTTH, DSL, FWA) to avoid	Benefit: Correctly restores the time denominator and prevents an unintended transformation of the benchmark from a monthly measure to an excessively different quarterly threshold. Evidence: TRAI explains that the omission of “/month” created an unintended interpretation and that it had already issued clarification on 20 March 2025. Safeguard: Publish monthly normalized figures even where compliance assessment remains quarterly. Consumer impact: The draft states: “Heading of the para 3.2.1, shall be substituted as ‘Fault incidences (No. of faults per 100 subscribers/month)’... Total number of faults reported during the assessment period × 100 / Total number of connections at the end of the assessment period.” This improves

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		masking chronic issues in underserved areas.	clarity but aggregated data can hide pockets of poor service. International QoS frameworks (e.g., Ofcom UK, FCC US) increasingly use granular, region-wise reporting to identify digital divides and target interventions.
5	Para 4(a)(i) — ≥98% coverage-map accuracy	Comment (Strong support with enhancement): The 98% accuracy benchmark for coverage maps and linkage to drive tests is a major step for consumer empowerment and informed choice. TRAI should (a) require a simple consumer-facing legend (good/average/poor/no coverage) and	Benefit: Accurate maps materially improve informed choice and reduce misleading coverage claims. TRAI states that drive tests have identified areas shown as covered that were deficient on the ground. Risk: A single LSA/all-technology score can conceal materially poor 5G, rural or district accuracy. Alternative: Report accuracy separately by technology, urban/rural category and, where sample size permits, district; publish sample count and confidence interval. Evidence: BEREC emphasizes accurate, useful consumer coverage information and FCC reporting is separate by technology and service-level. [9]

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		(b) mandate periodic independent validation (e.g., accredited third-party audits or crowdsourced measurement integration).	
6	Para 4(a)(iv) — wireless SNO definition/reporting	SUPPORT WITH MODIFICATION . Add a localized subscriber/cluster trigger.	Benefit: Expanding SNO beyond complete district failure closes a real regulatory gap identified by TRAI. Risk: “>10% of subscribers in the LSA” may still exclude a severe city, town or rural-cluster outage below 10% of a large LSA. Evidence insufficient: The Paper does not publish the distribution of outage size/duration needed to choose a precise additional threshold. Alternative: TRAI should analyze historical outage records and prescribe an additional district/cluster and absolute affected-subscriber trigger. Safeguard: Maintain the existing district-wide trigger and 4-hour notification classification.

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7	Para 4(a)(iv) — wireless rebate only for SNO >24 hours	SUPPORT WITH MODIFICATION . Make the remedy automatic and review the 24-hour threshold after evidence collection.	Benefit: Introduces tangible consumer redress. Risk: A consumer can lose essential mobile connectivity for 8, 12, 18 or 23 hours and receive no economic remedy. Alternative: TRAI should publish outage-duration and compensation-cost data and consider graded relief; at minimum, consider alignment with the draft wireline principle that >12 hours in a calendar day counts as one affected day for calculating a qualifying rebate. Automaticity: Once the network has detected the affected subscriber, no separate compensation claim should be required. Ofcom provides a precedent for automatic credit once its fixed-service qualifying condition is reached. [4]
8	Para 4(a)(iv) — “registered in district or affected subscribers, as applicable”	SUPPORT WITH MODIFICATION . Replace ambiguity with an explicit hierarchy for identifying affected consumers.	Risk: Registration address can both over-compensate consumers who were elsewhere and exclude roaming/travelling consumers actually affected. Safeguard: First identify affected subscribers from network-event/cell association records using privacy-minimized processing; where reliable individual

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			identification is unavailable, use the affected district/area as the presumptive class. Notify the subscriber automatically of the ticket, outage period and credit.
9	Para 4(a)(xiv) — wireless typical speeds / 80th percentile	SUPPORT WITH MODIFICATION . Require a TRAI-defined methodology for setting the “typical” speed.	Benefit: Technology-wise commitments are much more useful than a common lowest-technology value. Risk: Operators remain free to declare very low typical speeds, making 100% compliance easy without improving consumer experience. TRAI itself records measured speeds sometimes 10–20 times the declared typical values. Alternative: Typical speed should be empirically derived from actual valid busy-period observations and periodically refreshed. Point-of-sale disclosures should state technology, typical download/upload, relevant measurement period and geographic limitations.
10	Para 4(a)(xiv) — percentile terminology	SUPPORT WITH MODIFICATION . Replace “80th percentile after arranging in descending	Risk: Descending-order percentile terminology is readily misunderstood. Suggested wording: “the download/upload speed that at least 80% of valid measurements in the defined sample equal or exceed.”

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		order” with an unambiguous exceedance definition.	Consumer benefit: Consumers can understand what the commitment means without reverse-engineering the ordering convention. Safeguard: Publish median and lower-tail/busy-period performance in addition to the compliance value.
1 1	Para 4(b) — ≤1% 5G cells with daily PRB utilisation >80%	SUPPORT WITH MODIFICATION . Retain PRB as an early-warning congestion metric but not as the sole slicing consumer safeguard.	Benefit: Forces proactive capacity management. Risk: PRB does not capture backhaul, transport/core congestion, latency, packet loss or scheduler/slice-policy effects. TRAI itself discusses radio and backhaul capacity in its explanatory analysis. Alternative: Monitor alongside PRB: busy-hour throughput, latency, packet loss and backhaul utilization for ordinary IAS and relevant slices. Future-readiness: BEREC’s 2026 draft treats the underlying differentiated-QoS issue as technology-neutral beyond 5G. [5]
1 2	Para 4(c) — technology-wise typical speed	SUPPORT.	Benefit: Corrects misleading aggregation between 4G and 5G and lets consumers compare the technology they actually receive. TRAI states that measuring on the highest technology while declaring a lowest-technology typical speed can

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			produce unhelpful comparisons. Safeguard: Disclosure should identify whether features materially depend on 5G SA/NSA, while keeping consumer-facing language simple.
13	Para 4(d) — 21-day advance network-slice submission	SUPPORT WITH MODIFICATION . Retain advance notification for materially consumer-relevant or capacity-significant slices, with a standardized filing template and protection of legitimate confidential information.	Benefit: Enables ex-ante capacity oversight. Risk: Treating every slice configuration as requiring a bespoke 21-day process could unnecessarily slow network automation or innovation. Alternative: Define “new network slice” and materiality; allow standardized/automated notifications for routine changes. Safeguard: A new slice must not be launched where available evidence indicates material deterioration of ordinary internet access. BEREC’s framework facilitates innovation while applying open-internet principles and does not rely on universal ex-ante regulatory clearance. [5]
14	Para 5 — Silence Call Rate $\leq 1\%$	SUPPORT WITH MODIFICATION . Retain the KPI, but correct the measurement construct in	Benefit: Silence is directly perceptible consumer harm; TRAI reports drive-test silence-call incidences as high as 22% in some cases. Risk: The proposed numerator later counts multiple

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		Schedule-I para 5.7.	silence instances within one call while the denominator is calls established, meaning the result is an “events per calls” measure rather than literally a percentage of calls affected. Alternative: For “Silence Call Rate,” numerator = calls containing ≥ 1 qualifying silence event. Separately report silence events per 100 calls and aggregate silent duration.
15	Para 6(a)(iv) — wireline typical speed / 90th percentile	SUPPORT WITH MODIFICATION . Use the same transparent statistical formulation proposed above and require meaningful fixed-broadband remedies. The expanded definition of Significant Network Outage (SNO) and mandatory rebates for	Benefit: All tariff offerings become accountable. Risk: Self-selected low “typical” commitments can be gamed. Alternative: Define the metric as the speed at least 90% of valid measurements equal/exceed, together with busy-period typical range and a minimum contractual service threshold. Ofcom requires estimated peak-hour speeds, a personalized guaranteed minimum and a penalty-free exit right where unresolved speed problems persist. [3] Consumer-first reasoning: The draft defines SNO as “an event where access service (wireless) in a district remains unavailable... or where more

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		outages >24 hours are positive. TRAI may consider (a) lowering the rebate trigger to 12 hours in high-dependence urban/enterprise areas, and (b) mandating proactive SMS/app notifications to all affected subscribers with clear information on outage duration and rebate mechanism.	than ten percent (10%) of subscribers... experience complete loss of service... exceeding four (4) hours...” and requires proportional rent rebate and validity extension for postpaid and prepaid users. This directly addresses affordability and fairness—consumers should not pay for unavailable service. However, in a digital by default economy, even 12–24 hours of outage can have severe livelihood and education impacts; many regulators (e.g., Ofcom’s automatic compensation scheme for broadband) use shorter thresholds and mandatory consumer notifications.
16	Para 6(a)(vii) — wireline broadband fault incidences/month	SUPPORT.	Aligns terminology and calculation across relevant services and restores the intended monthly normalization. Safeguard: Publish the figure by service category rather than only an all-India aggregate where practicable.

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17	Para 6(b)(x) — MTTR ≤10 hours	SUPPORT WITH MODIFICATION . Add a tail-performance metric.	Benefit: Fixed broadband is increasingly essential and the new MTTR benchmark closes an omission identified by TRAI. Risk: A mean can be improved by many rapid repairs while a minority of users remain disconnected for days. Alternative: Retain MTTR ≤10 hours but additionally publish percentage repaired within 24 hours and a high-percentile repair-time indicator. Redress: Prolonged failures should trigger automatic credit/validity relief.
18	Para 6(b)(xi) — wireline broadband SNO	SUPPORT WITH MODIFICATION . Add localized triggers and clarify measurement of “material degradation.”	Benefit: Brings major fixed-broadband outages into TRAI’s direct monitoring. Risk: >10% of an entire “Service Area” can hide severe local failures; “20% below typical speed experienced by a subscriber” does not specify measurement location, home-Wi-Fi effects, test methodology or aggregation. Evidence insufficient: TRAI should first publish empirical SNO/degradation distributions. Safeguard: Define network-side/controlled measurement, affected-access-node/district

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			triggers, and separate access-network failure from customer-premises/Wi-Fi impairment.
19	Para 6(b)(xi) — broadband SNO rebates	SUPPORT WITH MODIFICATION . Mandate automatic identification, notification and rebate.	Benefit: Protects consumers during prolonged fixed-network failures. Alternative: Network-detected outages should create subscriber tickets automatically; compensation should be applied without an individual claim. Ofcom’s automatic-compensation scheme demonstrates the operational principle of automatic credit after a qualifying fixed-service failure. [4] Safeguard: Consumers should receive outage start/restoration messages and the calculated credit.
	Reg. 6(b)(xv); Schedule-I para 4.5.1 (Cells having daily PRB utilization >80% in 5G network ≤1%)	Comment (Support with forward-looking refinement): Introducing PRB-based congestion metrics and a ≤1% benchmark is timely for 5G. TRAI should clarify (a)	Future-tech and consumer impact: The draft explains: “A Physical Resource Block (PRB) is the fundamental unit of radio resource allocation... The higher level of PRB utilization... indicates network congestion... PRB Utilization in 5G NR is a measure of how fully the physical resource blocks are being used...” This is aligned with 3GPP/TEC performance measurement standards and anticipates network

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		treatment of differentiated QoS for network slices (eMBB, URLLC, mMTC), and (b) consumer-facing disclosure when chronic congestion leads to sustained speed degradation versus advertised “typical” speeds.	slicing. However, if operators oversubscribe slices for high-ARPU enterprise customers, retail consumers may face persistent congestion and reduced access quality. Clear rules on slice-wise capacity planning and consumer disclosure will prevent hidden quality discrimination and protect affordability for mass-market users.
20	New sub-reg. 6(3) (Advance submission of network slice parameters to TRAI)	SUPPORT WITH MODIFICATION . Support measurement according to underlying wireless access technology, but retain FWA as a distinct category in consumer-	Benefit: Avoids double/misclassified PMR reporting. TRAI states that some 5G FWA connections were being reported as wireline despite being delivered over wireless access. Risk: Consumers shop for “home broadband,” not PMR classifications; removing FWA from fixed consumer comparison would reduce transparency. Safeguard: QoES/consumer dashboards should

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		facing comparisons. Comment (Support, suggest consumer-centric conditions): The requirement that service providers submit details of proposed and existing network slices 21 days in advance is welcome. TRAI should explicitly state that (a) consumer-facing slices (retail 5G plans) cannot be degraded to favour specialised/enterprise slices, and (b) any slice reconfiguration	permit fibre/cable/copper/FWA comparison by retail use case. Risk mitigation & business structure: The draft says: “Every service provider, planning to create a new network slice... shall submit the details... clearly demonstrating the availability of sufficient capacity in the cell(s)... which are part of different slices...” While this protects technical integrity, business incentives may push operators to prioritise high-margin slices. International debates on net neutrality and 5G slicing (e.g., BEREC, ITU reports) highlight risks of de facto quality discrimination. Embedding consumer impact conditions in slice approvals will ensure future business models remain consistent with open, affordable access.

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		that materially affects typical speeds or latency must trigger updated consumer information and, where relevant, tariff revision or exit options.	
21	Para 7(a) — billing/charging complaints within one week	SUPPORT. This should take effect without delay.	Benefit: Four weeks is disproportionate in a digital billing environment; TRAI expressly relies on digitized subscriber records, centralized billing and digital financial transactions. Additional safeguard: Immediate acknowledgement/ticket number; no disconnection solely for a genuinely disputed amount while the complaint is under timely review; automatic correction/refund once an error is established; escalation where one week is missed.
22	Para 7(b) — separate customer-service compliance	SUPPORT.	Benefit: Prevents stronger performance in one service from masking weaker performance in another and improves consumer comparability. TRAI reports that

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	instead of aggregation		aggregated reporting created non-uniform measurement and incompatibility between LSA-based and all-India reports.
23	Para 7(c) — remove fixed wireless from wireline customer-service explanation	SUPPORT WITH MODIFICATION .	Apply the same principle as para 6(c): regulatory reporting may follow access technology, but public service-quality information should remain comparable across fibre, cable, copper and FWA products sold as household broadband.
	Reg. 7(vii) (Silence Call Rate $\leq 1\%$)	Comment (Strong support, suggest monitoring and public reporting): Introducing “Silence Call Rate” as a QoS parameter is a significant consumer-centric innovation, addressing a common but under-reported issue. TRAI	Evidence & consumer experience: The draft introduces: “Silence Call Rate – $\leq 1\%$, Monthly, Effective date 01.10.2026.” Silent calls directly affect perceived quality and can be more frustrating than outright call drops, especially for emergency or professional calls. TRAI’s earlier QoS regulations already emphasize cell-level voice packet drop and call drop monitoring; adding Silence Call Rate and making it publicly visible will empower consumers to compare operators on real voice experience, not just nominal coverage.

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
		should require operators to publish Silence Call Rate by circle and technology (2G/3G/4G/VoLTE/VoNR) on their websites, alongside call drop and voice packet drop metrics.	
24	Para 8(a) — publication of QoES	SUPPORT WITH MODIFICATION . QoES should be a transparent multi-component consumer-comparison tool, not an opaque league-table number.	Benefit: Integrating network performance, customer service and consumer perception can translate complex QoS data into usable consumer information. Risks: Weighting choices, unequal sample sizes, rural/urban averaging and survey bias can materially change rankings. Safeguard: Publish methodology, weights, component scores, sample size, geography, survey dates, confidence/uncertainty, and historical trend. Independent methodological review should precede headline rankings.

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25	Para 8(a) — QoES methodology	SUPPORT WITH MODIFICATION . Pilot before using QoES for enforcement or promotional claims.	Alternative: First publish draft methodology/data dictionary; conduct at least two pilot reporting cycles; publish component-level results; then introduce the consumer dashboard. Consumer empowerment: Permit comparison by operator, service, geography and technology rather than only one national score. CRTC’s recommended coverage publication similarly emphasizes interactive operator/service-level comparison and downloadable information. [10]
26	Para 8(b) — Schedule-III reference	SUPPORT. Core coverage-map requirements should sit in the Regulations/Schedule rather than only an administrative direction.	Benefit: Greater legal visibility and predictability. Safeguard: Keep fundamental consumer rights and benchmarks in regulations; reserve directions for technical schema, formats and implementation details.
27	Para 9(a) — ₹1 lakh per benchmark “per compliance report”	SUPPORT.	Clarifies the unit of financial disincentive and reduces interpretive ambiguity. Consumer principle: Financial disincentive must remain separate from and additional to direct consumer restitution where

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			consumers have suffered compensable service failure.
	Reg. 10(a) & (b) (Resolution of billing/charging complaints within one week – 100%; deletion of aggregation proviso)	Comment (Support, suggest escalation and data-driven oversight): Making “Resolution of billing/charging complaints within one week” a 100% benchmark and removing aggregation across access and broadband is positive. TRAI should (a) require operators to publish monthly statistics on billing complaint volumes and resolution times, and (b)	Consumer empowerment & affordability: The draft states: “Resolution of billing/ charging complaints within one week – Benchmark 100%” and deletes the proviso allowing aggregated compliance across services. Billing errors directly affect affordability and trust; consumer surveys in India and globally consistently show billing disputes as a top grievance category. Transparent reporting and automatic compensation for delays will incentivize operators to invest in robust billing systems and reduce consumer time and cost spent on dispute resolution.

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		consider a graded compensation mechanism (bill waiver/credit) for delayed resolution beyond one week.	
28	Para 9(b) — restructuring old Reg.16(2)–(4)	SUPPORT.	Separating benchmark failure, inaccurate reporting and common procedural provisions improves readability, provided no substantive consumer protection is lost. TRAI explains that the mechanisms are being relocated to proposed Regulations 16A and 17A.
	Reg. 9(b)(x) & (xi); Schedule-I para 4.1.3 (MTTR ≤10 hours; SNO for broadband with material degradation and rebates)	Comment (Support, propose integration with complaint and outage dashboards): MTTR and broadband SNO definitions, including “material	Consumer affordability & transparency: The draft introduces “Mean Time-To-Repair (MTTR) ≤10 hours” and defines broadband SNO including “material degradation in service quality... reduction of twenty percent (20%) or more in the download or upload speed... vis-à-vis the declared typical... speed,” with proportional rent rebate and validity extension. This recognizes that sub-par speeds are effectively partial

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		degradation” ($\geq 20\%$ speed reduction vs typical), are consumer-friendly. TRAI may (a) require operators to maintain real-time public outage dashboards (web/app) and (b) link MTTR performance to financial disincentives and to consumer compensation beyond 24-hour thresholds.	outages. Many regulators (e.g., Ofcom’s automatic compensation, some EU NRAs) combine MTTR metrics with mandatory compensation schemes to ensure operators internalize the cost of poor reliability rather than shifting it to consumers.
	Reg. 15(1)(e) & 15(3) (Service-wise Quality of Experience Score – QoES)	Comment (Strong support, request methodological transparency and consumer	Evidence & consumer-centric design: The draft adds: “Service-wise Quality of Experience Score (QoES)... based on various parameters of network performance, customer service, and consumer perception collected through multiple sources”

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		participation): Introducing a “Service-wise Quality of Experience Score (QoES)” based on network performance, customer service, and consumer perception is highly progressive. TRAI should publish (a) the detailed QoES methodology, including weights and data sources, and (b) circle-wise QoES rankings for each operator, with periodic consumer	and links it to Schedule-III. QoE indices used by regulators (e.g., Ofcom’s customer satisfaction indices, some Asian NRAs’ QoE dashboards) have proven effective in driving competition on quality, not just price. Transparent QoES will empower consumers to choose operators that perform better on holistic experience, including responsiveness and complaint handling, thereby improving both quality and empowerment.

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		surveys integrated into the score.	
29	Para 10 — Reg.16A — inaccurate/false compliance reports	Comment (Support, suggest stronger deterrence and public disclosure): Strengthen reporting integrity but clarify “false reporting” and the 1% tolerance formula. The structured financial disincentive framework for false reporting, including the “absolute value of difference exceeds 1% of the prescribed benchmark”	Benefit: Reliable regulatory data is essential because consumers and TRAI cannot assess quality using incorrect PMRs. TRAI reports observed mismatches between reported performance and performance calculated from submitted primary data. Risk: “absolute value of difference exceeds 1% of the prescribed benchmark” is mathematically ambiguous, particularly for higher-is-better benchmarks. The Explanatory Memorandum discusses a special treatment that is not fully evident from the operative text. Alternative: Insert an explicit parameter-by-parameter tolerance formula. Distinguish clerical/rounding corrections from materially inaccurate and deliberate/reckless reporting. Consumer trust & regulatory precedent: The draft explains that if “absolute value of difference exceeds 1% of the prescribed

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
		rule, is necessary. TRAI should (a) publish all instances of false reporting and associated penalties on its website, and (b) consider higher penalties for repeated misreporting in parameters directly affecting consumer rights (billing, outages, rebates).	benchmark, then such events shall also be considered as false reporting,” with escalating penalties up to ₹10 lakh per benchmark per compliance report. Accurate QoS reporting is foundational for consumer information and for TRAI’s oversight. Internationally, regulators (e.g., FCC, Ofcom) treat misreporting as a serious offence, often with public enforcement notices and substantial fines. Public disclosure in India will deter misreporting and reassure consumers that QoS data is reliable.
30	Reg. 16B & 17; 17A; 18 (Common provisions for financial disincentives ; non-compliance with other provisions;	Comment (Support with caution on cost pass-through): The expanded and harmonized financial disincentive regime (up to ₹10 lakh per instance/report,	Benefit: Closes enforcement gaps for transparency/publication duties that are not themselves KPI benchmarks. Risk: An undefined “instance” can create unpredictable stacking of penalties and disproportionate burden, especially for smaller providers, without necessarily increasing consumer protection. Safeguard: Penalty guidance should consider duration,

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
	removal of caps)	with common provisions under 17A) is appropriate to ensure compliance. TRAI should explicitly caution that penalties must not be passed on to consumers via tariff hikes or hidden charges, and may monitor tariff trends post-penalty to detect such behaviour.	affected subscribers, severity, recurrence, remedial conduct and whether the same underlying event already attracts another provision. Core consumer obligations should not be exempted by provider size. Risk of unintended cost burden: The draft provides for “an amount, by way of financial disincentive, not exceeding rupees five lakh per instance... eight lakhs... ten lakhs...” and removes earlier caps, while adding common provisions for opportunity to represent and remittance. While strong penalties improve compliance, operators may attempt to recover these amounts from consumers, especially in markets with limited competition. Some regulators (e.g., EU NRAs) explicitly monitor and, where necessary, intervene to prevent penalty driven tariff increases. A clear statement and monitoring framework from TRAI will protect consumers from unintended cost burdens.
	Schedule-I para 4.4.4	Comment (Strong	Consumer empowerment & future-proofing: The draft states:

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
	(Tariff offerings – 80th percentile measured speed $\geq$ offered typical speed for 4G/5G; slice-wise compliance)	support, suggest clearer consumer communication and legacy tech inclusion): The move from typical to measured speeds (80th percentile) and requirement that “each eMBB network slice shall be considered a part of separate tariff offering” are excellent. TRAI should (a) require operators to display typical and measured speeds prominently in tariff information, and (b) consider	“Measured download or upload speed shall be the 80th percentile... for each technology in each tariff offering... A tariff offering shall be considered ‘Non-compliant’ if... measured... speed is lower than the offered typical... speed...” and requires slice-wise compliance. This aligns with global moves towards realistic speed disclosure (e.g., “average” or “typical” speeds in EU broadband rules) and protects consumers from over-marketing. Ensuring that such transparency applies across all widely-used technologies will avoid a two-tier market where only 5G users benefit from robust speed guarantees.

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
		similar percentile-based benchmarks for legacy technologies where large consumer bases still exist (e.g., 4G non-5G areas).	
31	Para 11(a) — removal of overall ₹10 lakh cap on delay	SUPPORT WITH MODIFICATION .	Benefit: Prevents a long-delayed report from becoming economically indifferent after reaching a cap. Safeguard: TRAI should publish penalty-calculation guidance and retain due process under Reg.17A. Consumer value comes from timely data, not penalty revenue itself.
32	Para 11(b) — move hearing proviso	SUPPORT.	No consumer objection, because the right to representation is retained through proposed Regulation 17A rather than removed substantively.
33	Para 11(c) — report absent >3 months: up to ₹10 lakh/report	SUPPORT.	A specific consequence for complete non-submission improves enforceability. Safeguard: TRAI should publicly flag materially overdue QoS reports so consumers

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
			are not left relying on stale performance information.
3 4	Para 11(d) — move remittance provision	SUPPORT.	Administrative consolidation into Regulation 17A is reasonable and does not reduce consumer protection.
3 5	Para 12 — Reg.17A	SUPPORT.	Consolidating opportunity-to- represent and remittance provisions avoids repetition while retaining procedural fairness.
3 6	Para 13 — Reg.18 interest extended to 16A/16B	SUPPORT.	Ensures that newly created financial disincentives are not weakened through delayed payment.
3 7	Para 14(a) — daily system- generated CBBH	SUPPORT.	Benefit: A daily cell-specific busy hour is more responsive to actual changing traffic patterns than a fixed quarterly value. TRAI states that operators already generate busy hour automatically. Safeguard: Busy-hour selection and source counters must remain auditable and reproducible.
3 8	Para 14(b) — fault- incidence formula	SUPPORT.	Aligns the Schedule with the corrected monthly-normalized parameter.

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
39	Para 14(c) — complaints always accessible / auto-generated fault ticket	STRONGLY SUPPORT WITH MODIFICATION . Make automatic mapping mandatory whenever the operator can technically identify affected subscribers.	Benefit: This directly addresses a practice TRAI says can artificially improve fault metrics and deprive consumers of rebates when providers block individual fault registration during a known outage. Suggested rule: “Where an affected subscriber can reasonably be identified from network systems, the service provider shall automatically create or associate a fault ticket and notify the subscriber; manual complaint registration shall remain available.” This should be the foundation for automatic redress.
40	Para 14(d) — provider validation of coverage maps	SUPPORT WITH MODIFICATION .	Benefit: Targeting areas that generated consumer feedback improves verification efficiency. Risk: Validation should not be selected only by the regulated provider. Safeguard: Combine random statistically representative samples with complaint-targeted samples and TRAI-selected tests; publish minimum sample sizes by technology/geography. Independent field validation is consistent with international approaches. [11]

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
41	Para 14(e) — wireless SNO methodology	SUPPORT WITH MODIFICATION .	Same recommendations as para 4(a)(iv): add localized/subscriber-count triggers, automatic tickets, automatic compensation and unambiguous affected-subscriber identification. TRAI's proposed text requires all physically located district cells to be considered.
42	Para 14(f)(i)–(ii) — VoLTE QCI=1 / VoNR 5QI=1 corrections	SUPPORT.	These amendments correct the technical basis on which conversational voice bearer drops are assessed and align the wording with 4G/5G voice bearer treatment described by TRAI. 3GPP TS 23.501 is the relevant primary 5GS architecture specification. [8]
43	Para 14(f)(iii) — NVS and FCM codes	SUPPORT WITH MODIFICATION .	Benefit: NVS avoids meaningless voice KPIs where 5G RAN does not provide voice; FCM improves auditability of exclusions. Risk: Codes must not become a route for masking poor service. Safeguard: FCM exclusions should contain event ID, reason, dates, affected cells and auditable evidence. Consumer-facing coverage information should clearly distinguish “5G data coverage” from actual voice availability where relevant.

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
44	Para 14(g) — wireless speed methodology	SUPPORT WITH MODIFICATION .	Apply three safeguards: (1) empirically derived typical speed rather than an unconstrained self-declaration; (2) state the 80%-exceedance metric in ordinary statistical language; (3) repeated material underperformance should produce a consumer remedy, not notification alone. TRAI already requires corrective action and affected-customer notification.
45	Para 14(g)(x) — grouping tariff offerings	SUPPORT WITH MODIFICATION .	Benefit: Avoids duplicated testing where plans have genuinely identical network treatment. Risk: Grouping can conceal plan-specific throttling, caps or slice treatment. Safeguard: Plans may be grouped only if they have identical typical-speed commitment and materially identical traffic-management/QoS treatment; proportional subscriber sampling should remain mandatory.
46	Para 14(g)(xi) — each eMBB slice as separate offering	SUPPORT.	This is important because aggregation across slices could conceal differential treatment. Safeguard: Results should also compare sliced eMBB performance with ordinary/default internet access

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
			so TRAI can detect degradation imposed on non-premium users.
47	Para 14(h) — Network Slicing / PRB methodology	SUPPORT WITH MODIFICATION . Incorporate key safeguards from TRAI's own Explanatory Memorandum into binding text.	TRAI's explanation refers to radio and backhaul planning, equal 5QI/ARP treatment for comparable internet services, forward capacity assessment and preventing slicing from damaging other users, while the operative Schedule focuses principally on PRB. Safeguard: Require quarterly radio/backhaul forecasts where slicing is material; prohibit material detriment to baseline IAS; measure latency/packet loss/throughput; preserve emergency/public-interest services.
48	Para 14(h)(v) — removing congested cells from slicing	SUPPORT WITH MODIFICATION . Capacity augmentation and restriction on new slice admission should precede mandatory removal where removal itself	Benefit: Prevents chronic over-allocation. Risk: Abrupt removal could disrupt enterprise, public-safety or consumer services without necessarily improving ordinary IAS. Alternative: Escalation: optimisation → augmentation plan → restriction on new slice capacity → remedial reassignment/removal where persistent and safe. Safeguard: Existing ordinary IAS must receive

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
		could harm users.	priority protection against commercial overcommitment.
49	Para 14(i) — GSM RxQual 0–5 with frequency hopping	SUPPORT , subject to evidence retention.	The change incorporates TRAI’s April 2025 clarification and allows the extended treatment only where frequency hopping is used and supporting evidence is retained.
50	Para 14(j) — Silence Call Rate methodology	SUPPORT WITH MODIFICATION . Correct the numerator.	A “call rate” should count calls affected , not every RTP-gap instance. Under the draft, one call containing three ≥ 4 -second gaps contributes three numerator instances, so the measure is properly “silence-event instances per 100 established calls.” Recommended approach: KPI A: percentage of established calls with ≥ 1 qualifying silence event; KPI B: silence events per 100 calls; KPI C: total/average silence duration. Pilot measurement for two quarters before attaching direct financial disincentives.
51	Para 14(k) — wireline sampling: 5% or < 1 lakh, whichever lower	SUPPORT WITH MODIFICATION . Introduce a statistically justified	Benefit: Avoids an excessive testing burden on small plans. Risk: 5% of a very small tariff base may produce only a handful of samples, making compliance highly unstable. Evidence insufficient: TRAI should conduct and publish a statistical

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
		minimum sample floor.	power/sample-size analysis. Alternative: Minimum n by tariff/group, stratified geography/time sampling and multi-quarter pooling for genuinely very small plans.
52	Para 14(l) — wireline 90th-percentile methodology	SUPPORT WITH MODIFICATION .	State the commitment as the speed at least 90% of valid observations equal/exceed; prescribe how typical speed is derived; disclose peak/busy-period estimates and a minimum service threshold. Ofcom’s fixed-broadband disclosure/remedy precedent demonstrates the value of connecting speed information to an enforceable consumer remedy. [3]
53	Para 14(m) — wireline fault-incidence heading	SUPPORT.	Corrects time-normalization and removes ambiguity.
54	Para 14(n) — MTTR	SUPPORT WITH MODIFICATION .	Retain mean ≤ 10 hours, but publish long-tail repair performance and automatically map network-detected faults. Averages alone should not obscure consumers experiencing prolonged outages.

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
55	Para 14(n) — wireline SNO and >12-hour day rule	SUPPORT WITH MODIFICATION . Extend the >12-hour-one-day principle consistently to wireless SNO compensation and consider graduated treatment after evidence collection.	Benefit: The >12-hour rule provides a clear daily calculation. Risk: Consumers suffering serious but sub-24-hour outages may otherwise receive nothing. Safeguard: Publish SNO duration data before finalizing a lower universal threshold, but make any qualifying compensation automatic.
56	Para 14(n)(v) — force majeure exclusion	SUPPORT WITH MODIFICATION . Define and audit exclusions narrowly.	Risk: Broad force-majeure treatment can shift normal network-resilience risks to consumers. Safeguard: Provider must record event, causal link, affected infrastructure, resilience steps and duration; TRAI should audit exclusions. Even where compensation is lawfully excluded, consumers should receive timely outage/restoration information. Ofcom's scheme is a useful comparative example because, subject to exclusions, compensation may apply in some circumstances beyond provider control. [4]

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
57	Para 14(o) — billing complaints one week	STRONGLY SUPPORT.	Aligns Schedule-I with para 7(a). The consumer should receive an acknowledgement immediately and final resolution within the benchmark.
58	Para 14(p) — deposit-refund denominator includes non-provisioning	SUPPORT.	Benefit: Prevents service providers from achieving an artificially favorable refund KPI by excluding deposits that became refundable because the service was never provisioned. TRAI expressly identifies this omission.
59	Para 14(q) — Schedule modifiable by direction/order	SUPPORT WITH MODIFICATION . Permit agile updating only for technical details, not fundamental consumer rights.	Benefit: Technology evolves too quickly for static engineering schedules. ITU's IMT-2030 framework and 3GPP's continuing 5G-Advanced work confirm substantial technological evolution during the coming regulatory horizon. [12] Risk: Core rights could otherwise be changed without equivalent consultation. Safeguard: Benchmarks, compensation rights, material definitions and financial consequences should be amended through regulations/public consultation; schemas, API endpoints, field formats and measurement implementation

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
			details may be updated through directions.
6 0	Para 15 / Schedule-III paras 1.1– 1.3 — technology- wise maps and graded coverage	STRONGLY SUPPORT WITH MODIFICATION . Retain graded maps but make the primary consumer view service- oriented , with technology as a filter.	Benefit: “Excellent/Good/Fair/No coverage” is more useful than binary coverage. Risk: Technology generation does not itself tell a consumer whether voice or usable broadband will work. BERC emphasizes relevant and comparable consumer coverage information; CRTC work recommends mapping technology measurements into service levels. [13] Alternative: Default view: Voice / Basic data / Enhanced data, with technology filter underneath.
6 1	Para 15 / Schedule-III paras 1.5– 1.8 — 50m/100m grids and thresholds	SUPPORT WITH MODIFICATION .	Benefit: Standardized WGS-84 grids and consistent thresholds improve comparison. FCC similarly requires WGS-84/OGC-compliant GIS and technology/service-specific maps; its models use at least 50% loading and defined coverage probability. [14] Affordability risk: Fine granularity increases modelling/data costs, especially for smaller providers. CRTC research documents this trade-off. [15] Safeguard: TRAI should provide the master grid, open-

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
			source conversion/validation tools, sandbox APIs and templates; do not weaken consumer accuracy standards for small ISPs.
62	Para 15 / Schedule-III para 1.6 — indoor implications of Excellent/Good/Fair	SUPPORT WITH MODIFICATION . Avoid implying indoor performance unless independently validated.	Risk: The draft derives categories from outdoor measurements yet describes “Excellent” as working indoors in most cases. Indoor penetration varies by frequency, building material, handset and geometry. BEREK’s Common Position was expressly developed for outdoor mobile coverage; FCC separately describes outdoor stationary/in-vehicle environments. [9] Alternative: Clearly label outdoor confidence; provide separate validated indoor-likelihood information where available.
63	Para 15 / Schedule-III para 1.9 — signal strength not sufficient	STRONGLY SUPPORT.	TRAI correctly recognizes that signal strength alone does not establish customer service because cell loading and backhaul also matter. CRTC’s technical review similarly notes that service performance depends on additional assumptions including cell loading, device characteristics and backhaul. [16] Safeguard: Over time, supplement

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
			signal maps with measured QoS/QoE layers.
64	Para 15 / Schedule-III para 1.11 — combined map prefers higher generation	OPPOSE IN PRESENT FORM; RECOMMEND MODIFICATION . Do not automatically make the highest generation the dominant default representation.	Risk: Presence of 5G signal may not mean superior practical service, 5G voice, 5G SA availability or better indoor performance. A combined “5G covered” display can therefore recreate the very transparency problem TRAI seeks to solve. Alternative: Default combined view should select the highest validated service-level , not simply the highest generation; consumers can turn technology layers on/off.
65	Para 15 / Schedule-III paras 2.1–2.3 — update within up to three months	SUPPORT WITH MODIFICATION . Three months should be an outer limit only for immaterial modelling refreshes; material coverage changes should update significantly sooner.	Risk: A consumer may make a purchase decision using coverage data that ceased to be accurate months earlier. Alternative: Material commissioning/decommissioning or sustained coverage change reflected within 7–30 days; immediate conspicuous warning where the provider knows the published map is materially wrong; always show “data as of” and “last updated” dates. International practices vary, but CRTC’s review finds regulators collect updates from monthly to

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
			twice-yearly and stresses the need for sufficiently current information. [11]
66	Para 15 / Schedule-III paras 3–4 — website placement/usability	STRONGLY SUPPORT WITH ADDITION.	Benefit: A prominent “Service Quality” entry turns technical compliance into usable transparency. Additional requirements: multilingual/mobile-responsive interface; accessibility to recognized web-accessibility standards; address/location search; clear legends; data-as-of date; downloadable/open data and API; cross-provider TRAI comparison view. CRTC recommends interactive maps, location-level provider/service comparison and downloadable data. [10]
67	Para 15 / Schedule-III paras 5.1–5.6 — validation	SUPPORT WITH MAJOR MODIFICATION . Fix aggregation and one-sided accuracy.	Risk 1: All technologies/LSA aggregation can hide weak categories. Risk 2: The draft treats the sample as “accurate” whenever published coverage is equal to or worse than measured coverage; therefore systematic understatement can score as accurate. Alternative: Publish three metrics: overstatement rate, understatement rate and exact/within-one-category

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
			agreement; calculate separately by technology and urban/rural geography; specify representative minimum sample sizes/confidence. Evidence: International frameworks combine modelling with independent validation/challenges. [17]
68	Para 15 / Schedule-III para 5.5.1 — +3 dBm MySpeed allowance	PARTIALLY SUPPORT. Retain only if empirically validated and periodically reviewed.	Benefit: Device and measurement uncertainty is real. Risk: A fixed +3 dB adjustment always in the operator-favourable direction could systematically increase reported agreement. Evidence insufficient: The Consultation Paper explains the rationale but does not publish the validation distribution supporting exactly +3 dB. Recommendation: TRAI should publish device/model variance analysis and periodically recalibrate the margin. Crowdsourced measurements should primarily trigger investigation unless measurement conditions are sufficiently controlled. CRTC's review records similar caution. [2]
69	Para 15 / Schedule-III paras 6.1–6.5 —	STRONGLY SUPPORT WITH MODIFICATION . Establish two	Benefit: Consumers become active validators of marketing claims. FCC users can submit mobile challenge tests, and tests are aggregated

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
	consumer feedback/ch allenge	modes: anonymous feedback and verified formal challenge.	geographically before formal challenge action. [18] Privacy risk: Phone number + precise location can be highly identifying. Safeguard: Anonymous/pseudonymous feedback should be permitted; identifying data should be requested only where needed for a formal challenge/follow-up, separated from measurement data, access-controlled and retained only as necessary. India's DPDP framework regulates digital personal-data processing and provides Data Fiduciary obligations and data-principal rights. [19]
70	Para 15 / Schedule-III para 6.3 — 3D digital maps "essential" in urban areas	SUPPORT WITH MODIFICATION . Replace "essential" with an outcome-based requirement.	Benefit: Better clutter/building data may improve urban prediction. Risk: Mandating a specific input technology can create avoidable software/data costs and become obsolete. CRTC's review notes that detailed terrain/clutter data and modelling can be expensive and that greater granularity alone does not guarantee real-world accuracy. [15] Alternative: Require providers to use modelling inputs sufficient to achieve validated accuracy; TRAI may specify

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
			3D data where evidence shows it is necessary.
71	Para 15 / Schedule-III para 6.4 — amber marking of disputed/inaccurate areas	STRONGLY SUPPORT.	Benefit: Converts hidden regulatory uncertainty into actionable consumer information. Safeguard: Show date identified, reason (“consumer reports under validation” or “TRAI validation mismatch”), expected review date and resolution status. Avoid implying that one complaint alone conclusively proves an area inaccurate.
72	Para 15 / Schedule-III para 6.5 — feedback shared with TRAI via APIs	SUPPORT WITH MODIFICATION .	Privacy/security: TSP-to-TRAI API sharing should default to pseudonymized challenge/event identifiers rather than transferring phone number plus precise location unless necessary. Apply purpose limitation, access controls, retention limits, encryption and auditable access. India Code records the DPDP Act, 2023, the DPDP Rules, 2025, and enforcement notifications. [19] Primary source: https://www.indiacode.nic.in/handle/123456789/22037

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
73	Para 15 / Schedule-III paras 7.1–7.6 — standardized API/grid	SUPPORT WITH MODIFICATION .	Benefit: A common reference grid, JSON/GeoJSON and APIs can reduce inconsistent submissions and enable a unified TRAI platform. CRTC’s 2025 review similarly recommends a standard grid, schema, template files and detailed guidance. [20] Small-ISP safeguard: TRAI should provide free reference grids, schema validators, test endpoints, sample code, error diagnostics and a technical sandbox. CRTC specifically recommends support for very small operators facing software/skills costs. [21]
74	Para 15 / Schedule-III para 7.7 — TRAJ combined coverage map	STRONGLY SUPPORT WITH ADDITION. Make this a core consumer-comparison service rather than merely discretionary.	Benefit: Consumers should not have to open multiple operator websites to compare the same location. FCC and CRTC models demonstrate the consumer value of centralized provider/service-level mapping and challenge mechanisms. [22] Recommendation: TRAI should publish one national location-level comparison map, downloadable/open aggregate data and clearly disclosed methodology.

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
75	Para 15 / Schedule-III paras 7.8–7.9 — future modification	SUPPORT WITH MODIFICATION .	Technical fields should be readily updatable as networks evolve, but substantive rights should remain protected through formal regulation. Future evidence: 3GPP Release 18 integrates further satellite/NTN capabilities into 5GS, Release 19 is the second 5G-Advanced release, and ITU’s IMT-2030 framework is already in force. [23] Safeguard: Draft future technical directions publicly before material schema/measurement changes wherever practicable.
76	Additional recommendation — relevant to paras 4, 6, 8, 14(q), 15	ADDITIONAL RECOMMENDATION — establish “one accountable retail provider” principle.	Future services may combine retail TSPs, wholesale networks, neutral hosts, cloud-native cores, network slices, FWA, satellite/NTN links or other infrastructure. 3GPP is already further integrating satellite/NTN access in 5G-Advanced. [24] Consumer safeguard: Whatever the underlying architecture, the retail provider that contracts with the consumer must remain responsible for complaint handling, QoS disclosure and redress and must not redirect the consumer between wholesale/network partners.

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
77	Additional recommendation — relevant to paras 4, 8 and 15	ADDITIONAL RECOMMENDATION — TRAI Consumer QoS Comparison Dashboard.	Combine validated coverage, typical speeds, outages, repair performance, billing-complaint compliance and QoES at usable geographic levels. Benefit: Converts regulatory reporting into competitive consumer empowerment. CRTC recommends interactive location-specific provider/service-level comparison and downloadable data; BERC emphasizes highly accessible independent and reliable coverage information. [25]
78	Additional recommendation — relevant to paras 4(a)(xiv), 6(a)(iv), 14(g), 14(l)	ADDITIONAL RECOMMENDATION — persistent speed-underperformance remedy.	Notification and corrective action alone leave the consumer locked into a service that repeatedly fails its declared commitment. Recommendation: For fixed broadband, repeated material failure after a defined cure period should entitle the consumer to downgrade, terminate without penalty or receive an appropriate credit. For wireless, provide notice and plan/remedy rights where a tariff-specific speed representation is persistently not met. Ofcom provides a regulatory precedent linking promised broadband-speed performance to a

S. N o.	Para number of Draft Notification	Input / Comment	Justification with Supporting Reference, if any
			right to exit after an opportunity to remedy. [3]
79	Additional recommendation — relevant to paras 4(b), 4(d), 14(h)	ADDITIONAL RECOMMENDATION — technology-neutral non-detriment rule for differentiated QoS.	Suggested principle: “Provision of a network slice, specialized service or functionally equivalent differentiated-QoS mechanism shall not materially degrade the availability or general quality of the ordinary Internet Access Service offered to subscribers.” BEREC’s June 2026 draft expressly observes that logical partitioning/QoS differentiation is not unique to 5G, already exists in other networks and is expected to continue into 6G; it therefore applies a technology-neutral approach. [5]
80	Additional recommendation — relevant to para 15 / Schedule-III	ADDITIONAL RECOMMENDATION — technology-neutral future coverage taxonomy.	Regulations should not require permanent hard-coding of 2G/3G/4G/5G generations. Alternative: Define “commercially offered access technology” and allow technologies to be added/retired through technical schedules while keeping service-level categories stable. This avoids repeated regulatory amendment as 5G-Advanced, NTN and IMT-2030/6G mature. [26]

Priority consumer recommendations

Priority consumer recommendation	Suggested implementation timeline	Estimated responsible parties	Suggested safeguards
Automatic network-outage fault tickets and automatic redress	Core ticketing rule from commencement; automated compensation architecture within 6 months	TRAI; TSP/ISP billing, CRM and network-operations teams	Consumers identified by network telemetry should not have to file a duplicate claim; pre-paid and post-paid relief must have equivalent economic value; audit trail retained.
Redesign the 98% coverage-map accuracy metric	Methodology published within 3 months ; pilot for 3 months ; enforce disaggregated metric within 6–9 months	TRAI QoS/GIS teams; TSP radio-planning teams; independent auditors	Separate by technology and urban/rural class; minimum sample sizes; disclose overstatement, understatement and overall agreement; no LSA aggregation that masks weak 5G/rural results.
Central TRAI consumer coverage/QoS comparison map	Beta within 6 months ; public production platform within 9–12 months	TRAI; all wireless TSPs	Location search, provider/service comparison, data-as-of date, technology filters, accessible/mobile interface, public challenge and downloadable data.
Make “typical speed” empirically meaningful	Methodology consultation/direction within 3 months ;	TRAI; TSPs/ISPs; independent test/audit bodies	Typical speed derived from actual busy-period data; publish download/upload,

Priority consumer recommendation	Suggested implementation timeline	Estimated responsible parties	Suggested safeguards
	compliance after 6 months		sample methodology and technology; prohibit artificially low self-selected commitments.
Correct percentile language and add consumer remedy for repeated speed failure	With final methodology, within 3–6 months	TRAI; TSP/ISP billing and product teams	Define as speed that $\geq 80\%$ / $\geq 90\%$ of observations equal/exceed; fixed broadband right to remedy/downgrade/exit after persistent failure. Ofcom provides a useful precedent. [3]
Add localized SNO triggers	TRAI historical data study within 3 months ; revised thresholds within 6 months	TRAI; TSP/ISP NOCs	District/access-node/cell-cluster and absolute-subscriber trigger in addition to LSA/Service-Area percentage; thresholds to be evidence-based.
Technology-neutral network-slicing non-detriment safeguard	Operative rule from slicing provisions' commencement; expanded KPI reporting within 3–6 months	TRAI; 5G-SA operators; TEC as technical-support body	Radio PRB plus backhaul, latency, packet loss and throughput; protect ordinary IAS; quarterly capacity forecast where materially sliced; preserve innovation and emergency uses. BEREK's 2026 approach supports

Priority consumer recommendation	Suggested implementation timeline	Estimated responsible parties	Suggested safeguards
			technology-neutral treatment. [5]
Transparent, auditable QoES rather than one opaque score	Methodology in 3–6 months ; two pilot cycles; consumer dashboard within 12 months	TRAI; survey/audit agency; TSPs/ISPs	Publish weights, component scores, sample sizes, geography, uncertainty and trends; no headline ranking before methodology validation.
Privacy-by-design coverage feedback/API architecture	Before formal Schedule-III consumer feedback/API go-live	TRAI; TSP data-protection/security teams	Anonymous feedback option; verified formal-challenge pathway; pseudonymization; purpose limitation; retention limits; encryption/access controls; DPDP consistency. [19]
Small-provider implementation assistance without weaker consumer rights	Sandbox/toolkit within 3 months ; phased technical compliance over 6–9 months	TRAI; TEC; small ISPs/TSPs	Free reference grid, open validation tools, API sandbox, schema checker, templates and training. CRTC's review expressly identifies software/skills burdens on very small operators and recommends support. [21]

These priorities separate **universal consumer rights** from **proportionate compliance implementation**. A small ISP should not be allowed to provide

misleading information or deny redress merely because it is small; instead, TRAI should reduce the cost of compliance by supplying common tools, templates and infrastructure. The CRTC research is instructive because it recommends operator assistance specifically in response to software, skills and resource constraints rather than abandonment of accurate mapping. [21]

Phased implementation

A phased approach would preserve immediate consumer benefits while avoiding rushed implementation of complex measurement, GIS, API and QoS systems.

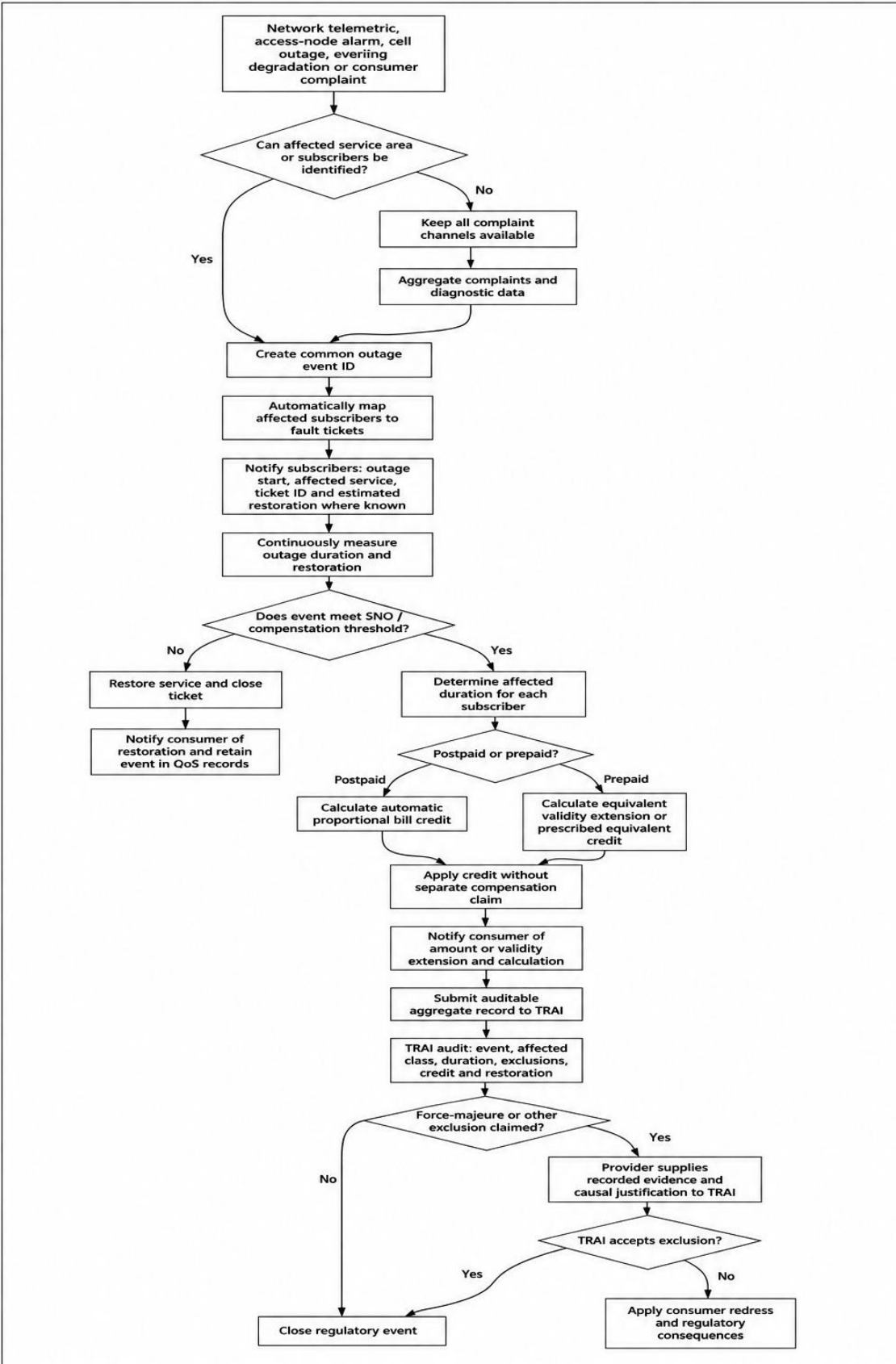
The distinction is important. Requirements that rely primarily on existing billing/CRM/network information—billing complaints, network-known fault tickets, truthful PMR reporting and outage notices—should proceed immediately. Requirements that depend on new statistical designs, standardized GIS architecture, privacy rules, validation samples or complex score construction should begin quickly but become sanctionable only after TRAI has published a stable methodology and completed a short pilot. International evidence shows that highly granular mapping requires clear schemas, model information, validation and implementation support. [20]

Future regulatory design should also anticipate that the technical environment will materially change within the requested five-to-ten-year horizon. 3GPP describes Release 18 as 5G-Advanced and includes deeper satellite/NTN integration; Release 19 continues that evolution. ITU's IMT-2030 framework is already in force, and in 2026 ITU reported progress toward technical performance requirements for the next generation. [6] The enduring regulatory

objects should therefore be **availability, usable quality, transparency, non-discrimination, accountability and redress**, rather than a fixed list of radio generations.

Automatic redress process

The draft's proposal that affected subscribers be permitted to register complaints **or be automatically mapped to system-generated fault tickets** provides the correct starting point for a substantially more effective consumer-redress architecture. The principle should be: **where the operator already possesses reliable evidence that the consumer's service failed, the consumer should not be required to recreate that evidence through a complaint.**



This architecture prevents artificial suppression of fault metrics, removes repetitive complaint effort, produces a clear evidence trail, enables automatic pre-paid/post-paid equivalence and makes exclusions auditable. TRAI itself identifies the current risk that failure to permit fault booking can artificially improve reported performance and deprive affected users of rebate eligibility.

It also addresses affordability. An automatic system has upfront implementation cost, but after integration it reduces repeated individual complaint handling and should be more scalable than requiring every consumer to call, authenticate and prove a network event that the operator's own systems already detected. The regulatory objective should therefore be **automation at the operator-level rather than transaction costs at the consumer level.**

Ofcom's automatic-compensation framework is not directly transferable—the UK scheme covers participating fixed broadband/landline providers and uses different qualifying periods and payment structures—but it provides evidence that the operational concept works. Ofcom states that compensation can be credited without a further request once the relevant qualifying condition has been met; for loss-of-service repair, a customer reports the initial fault and subsequent qualifying compensation is automatic. [4] TRAI can go further for network-wide events because the proposed Indian framework already contemplates **system-generated fault mapping.**

Privacy must be designed into this process. Subscriber-cell association/location information used to identify an affected class should be processed only to the extent necessary for fault diagnosis, consumer

notification, redress and regulatory audit. Consumer-identifying records should not appear in public outage datasets. India's DPDP statutory framework specifically addresses digital personal-data processing and Data Fiduciary obligations, and India Code records the 2023 Act, the 2025 Rules and related notifications. [19]

Our overall position

The Consumer Organization welcomes TRAI's decision to revisit the 2024 QoS framework at an early stage of implementation. Telecommunications and broadband are no longer discretionary communications products; they underpin access to education, work, finance, healthcare information, public services and economic participation. The appropriate regulatory objective is therefore not merely to ensure that networks satisfy engineering KPIs, but that consumers receive **truthful information before purchase, usable service after purchase and effective redress when service materially fails**. TRAI's Consultation Paper is substantially aligned with that direction.

We particularly support validated coverage maps, technology-wise typical-speed disclosure, significant-outage reporting for both wireless and wireline broadband, broadband MTTR, a one-week billing-complaint period, always-accessible complaint registration, system-generated fault tickets, QoES and stronger reporting integrity. These measures can materially improve transparency and accountability.

Our support is nevertheless conditional on several important corrections.

First, transparency must be **usable rather than nominal**. A 98% coverage-map benchmark will not empower consumers if its LSA-level aggregation masks poor 5G or rural accuracy, or if “Excellent” indoor coverage is inferred from outdoor signal measurements without sufficient validation. TRAI should publish disaggregated, independently testable results and a central cross-provider map. International evidence strongly supports standardized, validated and interactive coverage information. [27]

Second, speed regulation must prevent gaming. A rule requiring every plan to meet its “typical” speed has limited value if the provider itself can choose an artificially low typical figure. TRAI should specify how typical speeds are derived and express percentile compliance in plain statistical language. Persistent fixed-broadband failure should ultimately produce a contractual remedy as well as a network correction. Ofcom’s approach demonstrates the consumer value of linking speed disclosure to an actual remedy. [3]

Third, network-known failure should result in **network-driven redress**. Consumers should not need to prove an outage that the provider has already detected. Automatic ticket creation, notifications and pre-paid/post-paid compensation should become the default for identifiable qualifying events. TRAI should also study whether the present 24-hour compensation threshold adequately reflects consumer harm from serious shorter outages.

Fourth, 5G slicing should be enabled but not at the expense of ordinary users. PRB utilization is a useful early-warning KPI, but the enduring rule should be technology-neutral: differentiated services must not materially degrade baseline internet access. Radio capacity, backhaul, throughput, latency and

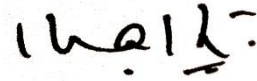
packet loss should therefore form part of the assessment. BEREC's 2026 work is instructive in treating this principle as relevant beyond 5G to other differentiated-QoS architectures and future 6G. [5]

Fifth, proportionality should reduce the **cost of compliance, not the level of consumer protection**. TRAI should give smaller operators standardized grids, free validation tools, APIs, templates and phased technical onboarding rather than exempting their customers from core rights. International evidence specifically identifies mapping software and skills as a small-operator burden for which regulatory support can be provided. [28]

Finally, the Regulations should remain capable of protecting consumers as technology and business structures change. 5G-Advanced, NTN/satellite integration and IMT-2030 are already progressing. [26] The retail consumer should therefore retain **one clearly accountable service provider** irrespective of whether the service is delivered through fibre, FWA, a network slice, wholesale infrastructure, neutral hosts, cloud-native cores, satellite links or future architectures.

Subject to these modifications, the Consumer Organization **supports the First Amendment as an important strengthening of India's QoS framework and recommends that TRAI adopt it with stronger safeguards for measurable transparency, automatic redress, statistical integrity, technological neutrality and universal consumer accountability.**

Thanks.



(Dr.Kashyapnath)
President

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