

To: <adv-qos1@traf.gov.in>

Date: Mon, 14 Sep 2026 22:16:09 +0530

Subject: Counter-Comments – Draft Amendments to QoS Regulations, 2024 – Fixed Broadband Outage Credit

Dear Sir,

Please find attached my 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".

The submission focuses on fixed-broadband outage accountability. In particular, it requests that the proposed >4-hour Significant Network Outage threshold also trigger a minimum direct consumer remedy, rather than requiring an outage to continue for more than 24 hours before subscriber relief begins. I propose a minimum 0.5-day equivalent credit for more than 4 and up to 12 cumulative outage hours in a calendar day, and a full-day equivalent credit for more than 12 hours, with recurring outages aggregated and relief applied automatically where provider records identify affected subscribers.

I respectfully request that these counter-comments be taken on record as an individual consumer submission.

Regards,
Shubham Pandey
Mumbai, Maharashtra

COUNTER-COMMENTS

TRAI 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

Submitted by	Shubham Pandey, Individual Consumer
Location	Mumbai, Maharashtra
Date	14 September 2026
Subject	Fixed-broadband outage accountability, automatic credit, and treatment of recurring outages

1. Executive position

The draft identifies a fixed-broadband Significant Network Outage (SNO) once the relevant outage/degradation exceeds four hours, but direct subscriber rebate/validity relief is proposed only when that SNO continues for more than 24 hours. That leaves a material gap: an outage lasting 5, 10, 18 or even 23 hours may be significant enough to require regulatory reporting, yet the affected consumer may receive no mandatory service credit.

I therefore support the four-hour SNO threshold and the proposed twelve-hour rule for treating an affected calendar day as a full day, but request a graduated consumer-credit mechanism beginning at the four-hour SNO threshold. The minimum should be one-half day of plan value/validity for more than four and up to twelve cumulative outage hours in a calendar day, and one full day for more than twelve cumulative outage hours.

This is a minimum accountability floor, not an assertion that four hours equals one-half of a 24-hour day. The policy basis is that TRAI itself treats an outage exceeding four hours as significant; four hours can also consume half of a conventional eight-hour working window. Once an outage is officially “significant,” the consumer should not be left with zero direct relief.

2. Para-specific counter-comments

Draft provision	Counter-comment	Justification / proposed treatment
Regulation 9(1), serial (xi); Schedule-I para 6.3.4(i)	Support the >4-hour SNO threshold for fixed broadband.	TRAI expressly recognises that a wireline broadband outage/degradation exceeding four hours is significant. That same threshold should be the starting point for minimum direct consumer relief, not merely a reporting trigger.
Schedule-I para 6.3.4(iii)	Modify the proposal that rebate/validity extension begins only if the SNO continues for more than 24 hours.	A 23-hour outage should not produce zero mandatory credit. Once verified provider-side outage time in a calendar day exceeds 4 hours, automatic relief should begin. Proposed minimum: >4 to 12 cumulative hours = 0.5 day equivalent credit; >12 hours = 1 full day equivalent credit.
Schedule-I para 6.3.4(iv)	Retain the rule that >12 outage hours in a calendar day counts as one full day, but add a half-day tier above 4 hours.	The proposed 12-hour rule is sensible as the full-day threshold. The missing middle tier is 4-12 hours. A graduated structure is more proportionate than either zero relief until 24 hours or a full-day credit immediately after a short interruption.
Schedule-I para 6.3.4; recurring outages	Aggregate verified provider-side outages occurring in the same calendar day.	Repeated outages can cause the same or greater disruption as one continuous outage. A brief restoration should not reset the consumer-credit clock. Otherwise recurring failures can escape relief even when total downtime is substantial.
Schedule-I para 6.3.2 read with para 3.2.2(vi)	Use system-generated fault mapping for broadband consumers and make credit automatic where provider records identify the affected connection.	The draft already requires affected subscribers to be able to register complaints or be mapped to system-generated fault tickets. Where the provider already knows the connection/access node was down, the consumer should not have to repeatedly call support or file a separate compensation claim.

Draft provision	Counter-comment	Justification / proposed treatment
Regulation 9(1), serial (x): MTTR <= 10 hours	Align consumer relief with the new MTTR accountability framework.	The explanatory note says consumers cannot afford long-duration broadband faults and proposes an MTTR benchmark of <=10 hours. A compensation rule that still permits up to 24 hours of significant outage with zero direct relief is difficult to reconcile with that policy objective.
Schedule-I para 6.3.4(v): force majeure	Distinguish regulatory penalty from consumer service credit.	A genuine force-majeure event may justify relief from a regulatory penalty. However, where the subscriber did not receive the paid service, TRAI should consider preserving consumer credit/validity relief even if provider fault is absent. The two concepts serve different purposes.

3. Recommended fixed-broadband consumer-credit rule

For verified provider-side fixed-broadband unavailability or qualifying material degradation, TRAI should adopt the following minimum rule:

Cumulative verified outage in a calendar day	Minimum direct consumer relief	Notes
Up to 4 hours	No minimum day-credit proposed under this submission	Still counted for QoS/fault metrics; TRAI may separately consider exact pro-rata relief.
More than 4 hours and up to 12 hours	0.5 day equivalent	Post-paid: at least 50% of one day's recurring plan charge. Pre-paid/fixed-validity: 12-hour extension or equivalent monetary/value credit.
More than 12 hours	1 full day equivalent	Post-paid: at least one day's recurring plan charge. Pre-paid/fixed-validity: at least 24-hour validity extension.
Multi-day outage	Apply the same calculation for each affected calendar day	Verified downtime should be accumulated day by day; short restorations must not erase already accrued outage time.

Why four hours for the half-day floor? Because the draft itself defines an outage exceeding four hours as a Significant Network Outage. If an event is significant enough to trigger mandatory regulatory reporting and root-cause accountability, it is reasonable that it also trigger a minimum direct consumer remedy. For many consumers, four hours also represents half of a conventional eight-hour working window; loss of that period can materially disrupt work, education, commerce and essential communication.

4. Automatic operation and anti-gaming safeguards

- Provider-side outage time should be measured from network/NOC telemetry, access-node records, CRM/fault systems and customer tickets, with the most reliable timestamp used.
- Where an area or access node is known to be affected, subscribers should be automatically mapped to the outage; they should not have to make repeated calls merely to preserve entitlement.
- Multiple outages in the same calendar day should be aggregated. A restoration of a few minutes or hours should not reset previously accrued downtime.
- The credit or validity extension should be applied automatically within a defined period after restoration and shown clearly in the next bill, app, portal, SMS or email.
- Service providers should retain auditable outage start/restoration times, root cause, affected nodes/subscribers and the credit calculation, and TRAI should be able to inspect those records.
- Aggregate service-area statistics on SNOs, restoration times and consumer credits should be publishable so consumers can compare provider reliability and accountability.

5. Consumer restitution should not be replaced by regulatory penalties

Financial disincentives payable to TRAI and direct consumer credit perform different functions. A regulatory penalty enforces compliance; a consumer credit restores value to the person who paid for service that was unavailable. Payment of one should not extinguish the other.

6. Illustrative consumer experience

I am separately pursuing an individual fixed-broadband consumer grievance in Mumbai involving repeated disconnections, prolonged periods without usable connectivity, repeated support contacts and difficulty obtaining an effective remedy. I do not ask TRAI to adjudicate that individual dispute through this consultation. I refer to it only to illustrate the regulatory gap: repeated outages can consume substantial paid service time and working time even when each interruption is treated as a fresh incident.

7. Request to TRAI

1. retain the proposed >4-hour fixed-broadband SNO threshold;
2. remove the present gap under which direct subscriber relief begins only after an SNO continues for more than 24 hours;
3. introduce a minimum 0.5-day equivalent credit for >4 to 12 cumulative outage hours in a calendar day and retain a full-day credit for >12 hours;
4. aggregate recurring provider-side outages within the same calendar day;
5. make credit/validity relief automatic where provider records identify the affected subscriber or access node;
6. require transparent notice and an auditable calculation of the relief applied; and
7. keep consumer restitution distinct from regulatory financial disincentives.

8. References

- TRAI, Consultation Paper on Draft Amendments in The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024, dated 5 August 2026.
- Draft Schedule-I para 6.3.4(i)-(v): fixed-broadband SNO threshold (>4 hours), reporting, rebate after >24 hours, >12 hours in a calendar day treated as a full day, and force-majeure treatment.
- Explanatory note, sections 2.14-2.15: proposed fixed-broadband MTTR benchmark ≤ 10 hours and TRAI's statement that consumers cannot afford long-duration broadband faults.
- Schedule-I para 6.3.2 read with para 3.2.2(vi): complaint availability / system-generated fault-ticket mapping during disruptions.
- TRAI ongoing consultation page: counter-comments closing on 15 September 2026.

Submitted respectfully,

Shubham Pandey
Individual Consumer
Mumbai, Maharashtra
14 September 2026