02nd September 2026

Advisor (QoS-1)
Telecom Regulatory Authority of India
4th, 5th, 6th & 7th Floor, Block-F
World Trade Centre, Nauroji Nagar
New Delhi – 110029

Subject: Response to Consultation Paper on draft amendments in the Standard of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations 2024.

Dear Sir,

This is in reference to the Consultation Paper issued by the Authority on 5th August 2026 regarding "Draft amendments in the Standard of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations 2024".

In this regard, we, Tata Teleservices Limited (TTSL) and Tata Teleservices (Maharashtra) Limited [together called "TTL"] hereby enclose our response to the draft amendments in your above-mentioned Consultation Paper.

We believe TTL response will be given due consideration.

Thanking you and assuring you of our best attention always.

Thanking you,

Yours sincerely

Mukesh Dhingra
General Manager – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
For Tata Teleservices (Maharashtra) Limited

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Comments /feedback on the draft amendments in 'The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024

S. No.	Para Number of Draft Notification	Input / Comment / Counter Comment	Justification with Supporting Reference	Reference
1	**Para 3 of Draft Notification (Regulation 4)**	TTL supports the proposed amendment.	The amendment only clarifies that the parameter "Fault incidences (No. of faults per 100 subscribers/month)" is to be measured on a monthly basis. There is no change in the benchmark or the methodology for assessment of the parameter. This clarification will remove ambiguity and ensure uniform reporting methodology across all service providers. While TTL supports the objective of ensuring timely resolution of customer faults and complaints, it respectfully requests TRAI to reconsider the benchmark of 99% for resolution within three working days and revise it to 95%. The request for a reasonable relaxation is based on the fact that, under Wireline and Broadband services, fault restoration may sometimes be delayed due to factors beyond the direct control of the service provider, such as cable damage caused by road digging or civil works undertaken by third parties. Further, resolution of such cases may involve coordination with local authorities, municipal corporations, or other agencies for obtaining supporting evidence and necessary access. The existing 1% margin under the 99% benchmark may therefore not be sufficient to accommodate such genuine and unavoidable cases. For example, underground cables may be damaged during road digging or other civil works undertaken by municipal authorities or third parties without prior intimation. In such cases, identifying the damage location, obtaining access, coordinating with the concerned agency, and arranging the required manpower and materials may take additional time, despite prompt action by the service provider. Accordingly, TTL respectfully requests TRAI to	CP- Page 5.

			reconsider the existing 99% benchmark and revise it to 95%, considering the operational challenges and external factors involved, while continuing to ensure timely resolution of customer faults and complaints.	
2	**Para 6(a) - Regulation 9(1), S. No. (iv)**	TTL supports the proposed amendment subject to benchmark should not be 100% and retention of practical measurement methodology.	TTL supports the objective of greater transparency in reporting of actual download and upload speeds. However, the proposed requirement that all tariff offerings should meet the benchmark, wherein the 90th percentile of the measured download and upload speed is equal to or higher than the declared typical speed, may be difficult to implement in practice. Further, a QoS benchmark should not effectively require 100% compliance with the declared typical speed, as actual broadband performance may vary due to several factors. TTL requests that the existing criterion of covering at least 75% of the subscriber base through the top tariff plans be retained instead of requiring measurement of all tariff offerings. Covering all tariff plans would significantly increase the number of measurements and create an additional compliance requirement, particularly where there are multiple tariff offerings with similar declared download and upload speeds. Further, conducting performance measurements at customer premises involves practical challenges. For example, access to the customer premises may not be available due to unavailability of the customer for any reason. This is despite of the fact that time is taken before planned visit. In some cases, permission from housing societies/RWAs may also be required for access, cabling, equipment installation, or repair activities. Such genuine operational constraints can make it difficult for TSPs to cover all the plans specially which are having low base. Accordingly, TTL requests TRAI to retain the criterion of covering at least 75% of the subscriber base through the top tariff plans. Further, tariff plans having the same typical download and upload speeds should be considered as a single group/tariff offering for the purpose of measurement and compliance	CP-Pages 8; Methodology Pages 21-22.
3	**Para 6(a) - Regulation 9(1), S. No. (vii)**	TTL supports the proposed amendment but	TTL requests TRAI to consider revising the benchmark to ≤7 faults per 100 subscribers per month.	CP-Page 8.

		requesting TRAI to consider revising the benchmark	A significant number of faults may arise due to factors beyond the direct control of the service provider, such as external cable damage, power-related issues, local infrastructure constraints, and other third-party dependencies. In particular, Government agencies, civic bodies, and 3other infrastructure agencies undertake activities such as road widening, excavation, and other development works, which may result in damage to telecom infrastructure. However, detailed information regarding planned or unplanned digging activities is often not made available to service providers. Although the Government has introduced the Call Before u Dig (CBuD) app. Such activities are not always updated on the portal, nor are public notices issued for every such activity. Consequently, it may not be practical for service providers to obtain documentary evidence from external agencies for each individual fault incident. Further, there is currently no specific provision for excluding such fault incidents where the cause is beyond the service provider's reasonable control. This can have a disproportionate impact on smaller service providers such as TTL, particularly in LSAs with a low subscriber base, where even a few additional fault incidents can significantly increase reported faults per 100 subscribers. The parameter "Fault incidences (No. of faults per 100 subscribers/month)" is intended to measure fault incidence in relation to the subscriber base. However, the existing benchmark does not adequately address the challenges faced by service providers having a low Wireline/Broadband subscriber base. In such cases, a small increase in the absolute number of faults can substantially impact the reported value and may result in non-compliance, despite the overall fault incidence being relatively low. Accordingly, TTL requests TRAI to consider slab wise faults so that Telco with smaller subbase is not impacted due to this parameter. Alternatively, consider revising the benchmark to ≤7 faults per 100 subscribers per month and also consider an	

			appropriate exclusion mechanism for faults caused by events or activities beyond the reasonable control of the service provider.	
4	**Para 6(b) - Regulation 9(1), S. No. (x) MTTR**	No change required from previous regulation	Broadband fault restoration involves multiple activities, including fault identification, site access, route inspection, cable repair, splicing, testing, and service restoration. While the service provider makes all reasonable efforts to restore services at the earliest, the overall restoration time may, in certain cases, be significantly impacted by factors beyond its reasonable control. The proposed MTTR benchmark of ≤10 hours may therefore not be achievable in certain genuine circumstances, particularly where restoration is dependent on external agencies or site-related constraints. For example, if an underground fibre cable is damaged during road widening or municipal excavation, the service provider may identify the fault and immediately mobilise its restoration team; however, restoration may be delayed until the site is made accessible or safe, necessary permissions are obtained from the concerned authority, or related civil work is completed. Similarly, in the event of a major fibre cut caused by metro construction or third-party utility work, restoration may require coordination with the concerned agency and may take significantly longer than 10 hours despite timely action by the service provider. Such delays do not necessarily reflect the actual fault-handling or restoration efficiency of the service provider. Including delays attributable to external factors in the MTTR calculation may consequently result in an artificially higher MTTR and could lead to non-compliance even where the service provider has taken all reasonable steps within its control to restore the service. Further, documentary evidence from Government authorities, civic bodies, or other third parties may not be readily available for every such incident. Planned or unplanned activities such as road excavation, utility work, or infrastructure development may not always be communicated to the service provider in advance or recorded on the Call Before You Dig (CBuD) portal. Therefore, making documentary	CP Page- 9; Methodology Pages 23 & 155

			evidence a mandatory requirement for exclusion of every such incident may also not be practically feasible. Accordingly, TTL requests TRAI not to introduce the proposed ≤10-hour MTTR benchmark for Broadband services. Alternatively, if the benchmark is introduced, TTL requests TRAI to provide a clear, practical, and objective exclusion mechanism for restoration delays attributable to external factors beyond the reasonable control of the service provider, so that the MTTR reflects the actual restoration performance of the service provider.	
5	**Para 6(b) , Regulation 9(1), S. No. (xi) Significant Network Outage (SNO)**	TTL requests TRAI to kindly reconsider the proposed requirement for reporting SNOs	Wireline Broadband services of TTL are supported through a centralized network architecture with built-in redundancy. Accordingly, district-level identification and reporting of outages may not always be technically feasible or representative of the actual network configuration. Further, in the event of any significant outage, the immediate priority is to stabilize and restore the network, followed by the necessary internal assessment and external reporting. This restoration process may require coordination across multiple teams and, in certain cases, with external agencies. The proposed definition considers an event as an SNO where Broadband (Wireline) service in a district remains unavailable for more than four hours, or where more than 10% of subscribers in the Service Area experience complete loss of service or material degradation of 20% or more in download/upload speed against the declared typical speed for more than four hours. TTL submits that performance and complaint resolution are already monitored through the prescribed QoS parameters, which provide an established framework for TRAI to assess service performance. Therefore, introducing an additional SNO-specific reporting requirement may result in duplication of reporting and additional operational complexity. Accordingly, TTL requests TRAI to kindly reconsider the proposed SNO reporting requirement.	CP - Pages 9-10; Methodology Page 23.

6	**Para 6(b) - Regulation 9(1), S. No. (xi) Rebate for SNO exceeding 24 hours**	TTL requests TRAI to kindly reconsider the proposed requirement for provision of rent rebate mechanism for SNOs	As mentioned above, TTL respectfully requests TRAI to reconsider the proposed reporting of Significant Network Outage (SNO) and similarly requested for rent rebate mechanism for subscribers impacted by the same. Rent rebate/adjustment is already being provided by TSPs in applicable cases, and there has been no adverse feedback from customers regarding the existing practice. Further, the nature and impact of outages in Wireline Broadband services are different from those in mobile networks. In Wireline Broadband, outages may often be isolated to individual connections or specific network elements, whereas a mobile network outage may impact multiple subscribers within a particular geographic area simultaneously. TTL also submits that complaints and service performance are already monitored through the prescribed QoS parameters, including fault restoration and complaint resolution timelines. Therefore, introducing an additional subscriber-level rent rebate mechanism based on SNO criteria may result in additional operational and reporting complexities. Accordingly, TTL requests TRAI to reconsider the proposed rent rebate mechanism for SNO-impacted subscribers, considering the existing industry practice, the distinct nature of Wireline Broadband outages, and the practical challenges in accurately determining subscriber-level impact and eligibility for rebate.	CP -Page 10; Methodology Pages 23-24.
7	**Para 6(c) - Explanation under Regulation 9(2)**	TTL supports the proposed amendment.	Removal of the words "fixed wireless and" clearly distinguishes Broadband (Wireline) from Fixed Wireless Access services and eliminates ambiguity in reporting and compliance obligations.	CP-Page 10.
8	**Para 7(a) - Regulation 10(1), S. No. (ii)**	TTL requests retention of existing timeline.	While expeditious resolution of billing complaints is desirable, certain billing complaints require detailed investigation involving historical billing records, system reconciliation, fraud checks, customer-specific configurations, and validation across multiple platforms. Therefore, mandating a uniform one-week timeline for resolution of all billing/charging complaints may not be operationally feasible. The	CP- Page 10; Methodology Page 24.

major reasons, with practical examples, are as follows:

1. Multiple Team Dependencies
(a) Resolution of certain billing complaints requires coordination among multiple internal and external teams such as Billing, CRM, Network, Finance, IT and Circle teams.

Example: In case a customer disputes excess charges, the complaint may require verification of usage records in the billing system, validation of the applicable tariff/plan in CRM, and reconciliation of the invoice before the final adjustment can be processed.

(b) Where corrective action is required in the system, the resolution may depend on the system functionality and billing cycle. For example, after the required correction is made, DRT may be able to process the waiver/adjustment only after the corrective action is reflected and the relevant invoice is generated.

(c) Each team has its own queue, SLA and operational dependencies. Therefore, completion of all activities within one week may be difficult in cases requiring multiple levels of validation.

2. Impact of Non-Working Days
(a) Weekends, public holidays and regional holidays reduce the actual working time available for investigation and resolution.

(b) **Example:** A complaint received on a Friday evening may involve a weekend or holiday before the concerned team can take up the case, leaving significantly less effective working time within a one-week timeline.

3. Dependency on External Stakeholders
(a)Certain complaints may require inputs or confirmation from network partners, vendors, circle teams or third-party agencies.

(b) **Example:** In case of a billing dispute related to a service configuration or a third-party system,

			confirmation from the concerned vendor/partner may be required before the billing adjustment can be finalized. Such dependencies may not always be resolved within one week. **4. Quality and Accuracy vs. Timelines** (a) Billing complaints directly impact customer charges; therefore, adequate time may be required to establish the root cause and ensure that the correction is accurate. **Example:** A complaint regarding repeated billing, incorrect tariff application or disputed usage may require comparison of historical invoices, plan details and system records. Rushing such investigation may result in an incorrect adjustment or resolution of the complaint. **5. System and Process Changes** (a) Existing workflows, escalation matrices, dashboards and SLA tracking mechanisms are configured based on the prevailing working-day timelines. (b) **Example:** Reduction of the resolution timeline from four weeks to one week would require changes in workflow prioritization, escalation mechanisms, system configurations and monitoring dashboards, along with corresponding process re-engineering. In view of the above operational dependencies and practical challenges, TTL respectfully requests TRAI to retain 4 weeks resolution period instead of proposed one week.	
9	**Para 7(b) - Regulation 10(1), deletion of aggregation provision**	TTL requests retention of aggregated compliance.	The Authority, through Letter No. RG-17/(3)/2022-QoS dated 20 March 2025, instructed service providers to submit the performance of 'Customer Service' related parameters separately for Access Service (Wireline) and Broadband (Wireline) services in their respective PMRs from QE March 2025 onwards. However, customer service, complaint handling, CRM, and billing systems are generally common for both Access Service (Wireline) and Broadband (Wireline). The use of common systems enables	CP-Page 11.

			operators to manage customer services more efficiently, optimize resources, and derive operational benefits without affecting the quality of service provided to customers. Accordingly, it is requested that the existing flexibility for aggregated compliance/reporting may be retained where common operational and customer service systems are being used for both services.	
10	**Para 9 - Amendment in Regulation 16**	TTL supports the proposed amendment.	The expression "per benchmark per compliance report" clearly defined to avoid ambiguity in calculating financial disincentives where multiple parameters are contained in a single compliance report.	CP- Page 11.
11	**Para 10 – Insertion of Regulation 16A: Consequences for failure to submit correct compliance reports**	TTL requests that genuine or inadvertent discrepancies, including data-processing, calculation, or typographical errors, should not be treated as "false reporting." Financial disincentives should apply only to intentional or wilful false reporting, after providing an opportunity for clarification.	The proposed Regulation 16A provides for a financial disincentive of up to Rs. 2 lakh per benchmark per compliance report for the first instance of false reporting, which may increase to Rs.5 lakhs for the second consecutive instance and up to Rs.10 lakhs for each subsequent consecutive instance. The proposed provision further states that where the difference between the performance reported by the service provider and the performance calculated or observed by the Authority during audit exceeds 1% of the prescribed benchmark, it may be treated as false reporting. This provision is directly relevant to TTL's Wireline and Broadband (Wireline) QoS compliance reporting. TTL submits that, for TSPs having a relatively low subscriber base, even a minor variation in the underlying number of subscribers, complaints, faults, or other measured parameters can result in a comparatively significant percentage variation in the reported QoS performance. Therefore, applying a uniform 1% tolerance threshold may not be proportionate and could potentially result in genuine calculation or data variations being treated as false reporting. TTL therefore respectfully requests the Authority to distinguish between inadvertent errors, genuine data/calculation discrepancies, and intentional or wilful false reporting. Financial disincentives under the proposed Regulation 16A should be applicable only where there is a clear finding of intentional or	CP- Pages 12–13.

			wilful false reporting, after providing the TSP an opportunity to clarify and substantiate the reported figures. This approach would ensure that the financial disincentive mechanism remains proportionate and is applied specifically to cases involving deliberate misreporting, while genuine and inadvertent discrepancies are addressed through an appropriate clarification or correction mechanism.	
12	**Para 10 – Insertion of Regulation 16B: Consequences for failure to comply with any other provisions of the Regulations**	TTL requests further clarity on the proposed FD structure, including its applicability and calculation methodology. Considering the existing regulatory obligations, TTL also requests TRAI to reconsider the additional FD provisions to avoid undue financial burden on TSPs.	Proposed Regulation 16B provides for a financial disincentive of up to Rs. 5 lakh for each instance of non-compliance, increasing to Rs. 8 lakh for the second consecutive contravention and up to Rs. 10 lakh for each subsequent consecutive contravention. TTL requests further clarity on the proposed FD structure, including the types of non-compliance covered, applicable conditions, measurement methodology, and basis for imposing the FD. Since TSPs are already subject to various penalty/FD provisions and periodic TRAI audits and compliance assessments, TTL requests clarity on the rationale and need for introducing the proposed additional FD provisions, particularly to avoid overlapping or multiple consequences for the same non-compliance.	CP- Page 13.
13	**Para 11 (c)– Amendment in Regulation 17**	TTL requests that the proposed financial disincentive for delayed submission of compliance reports be reconsidered.	TTL supports the objective of timely submission of compliance reports. However, non-submission of a report even beyond three months may not necessarily be intentional and could arise due to genuine operational, technical or data-related issues. Therefore, TTL respectfully requests that a reasonable opportunity of representation be provided before imposing the proposed financial disincentive of up to 10 lakh per report, even where the report remains pending beyond three months. The reasons for the delay and the efforts made by the service provider may be considered by the Authority before deciding on the imposition of any financial disincentive.	CP- – Page 14.
14	**Para 12 – Amendment in Regulation 17**	TSPs should be given an opportunity to	TTL supports the proposed Regulation 17A, as it provides an important safeguard by ensuring that no financial disincentive is imposed without giving the	CP- – Page 14.

		explain the reasons for any delay, particularly where it is due to bona fide technical or system issues or circumstances beyond their reasonable control.	service provider a reasonable opportunity to represent its case. TTL requests that the opportunity to represent should be provided before any financial disincentive is imposed, and the Authority should duly consider the explanation, facts, and circumstances submitted by the service provider before taking a final decision. This will ensure fair, transparent, and proportionate implementation of the financial disincentive provisions.	
15	**Para 13 – Amendment in Regulation 18**	Clear communication of the financial disincentive order and reasonable opportunity for representation under the proposed common provisions.	Regulation 18 deals with consequences for failure to pay financial disincentives/submission of FD amount. The proposed amendment extends its reference from Regulation 16 to also include proposed Regulations 16A and 16B. Therefore, if any financial disincentive relating to Wireline/Broadband compliance is imposed under these provisions, Regulation 18 would consequentially apply. TTL requests that, considering the substantial FD amounts already prescribed for various benchmarks and grounds, no additional interest should be imposed for delayed payment where the delay is due to justified and bona fide reasons.	Page 15.
16	**Para 14(b) – Schedule-I, Para 3.2.1**	TTL supports the clarification of the parameter and formula. Requesting to consider suggested Avg. sub-base for calculating the correct performance of this parameter.	The proposed amendment changes the heading to "Fault incidences (No. of faults per 100 subscribers/month)" and prescribes a revised calculation methodology. Clear treatment of duplicate/repeated complaints would help ensure uniformity and consistency in reporting across service providers. **Suggestion regarding Consideration of Subscriber Base** TTL submits that, for calculating the relevant QoS parameters, the subscriber base should be considered on a consistent and representative basis. Instead of considering the subscriber base as on the last day of the quarter, TTL suggests that the average subscriber base of all three months of the relevant quarter should be used for computation. The subscriber base may vary significantly during a quarter due to additions, disconnections, migrations, and other operational changes. In TTL's case, the subscriber base has been on a declining trend month-on-month. Therefore, considering the subscriber	CP- – Page 15.

			base as on a particular date, especially the quarter-end date, may not accurately represent the subscriber base during the reporting period and may adversely impact the reported QoS performance. Using the average subscriber base of the three months would provide a more accurate and equitable representation of the subscriber base and minimize the impact of month-to-month fluctuations. Accordingly, TTL requests TRAI to consider the average subscriber base of the three months of the relevant quarter, instead of the subscriber base as on the last day of the quarter, for calculating the applicable QoS parameters.	
17	**Para 14(c) – Schedule-I, Para 3.2.2**	TTL supports the objective but requests flexibility, as automatic ticket generation may create duplicate complaints for the same network fault and impact QoS performance	TTL supports the objective of ensuring continued access to complaint registration during service disruptions and enabling all affected subscribers to register complaints. However, automatically mapping all affected subscribers to system-generated fault tickets may result in duplicate complaints for the same network fault and adversely impact QoS reporting.	CP Page 15.
18	**Para 14(k) - Schedule-I Para 6.2.1 (Broadband Field Visit Requirement)**	TTL request to review the sample size/percentage of field visits for ISP's having low sub-base.	The proposed framework requires service providers having less than one lakh subscribers to cover 600 subscribers or 5% of the subscriber base of each tariff offering, whichever is lower, whereas service providers having more than one lakh subscribers are required to cover only 1,067 subscribers. This results in a disproportionately higher sampling requirement, in percentage terms, for service providers having very low base. For example, a service provider having approximately 10,500 subscribers would be required to test around 525 subscribers, representing 5% of its total subscriber base. In comparison, an operator having more than one lakh subscribers would be required to test only 1,067 subscribers, which represents approximately 1% or less of its subscriber base. Thus, the proposed methodology places a significantly higher sampling burden on service providers having low sub-base.	CP- Page 186, Schedule-I Para 6.2.1.

			Further, the requirement that the same subscriber should not be selected for testing during the preceding 24 months significantly reduces the available sample pool for service providers having low sub-base. Since such operators have a limited subscriber base, excluding previously tested subscribers may make it increasingly difficult to identify sufficient eligible subscribers in subsequent assessment periods. This may also result in a substantial proportion of the total subscriber base being repeatedly approached for testing. For instance, with a subscriber base of approximately 10,500, testing 525 subscribers in each applicable assessment period would mean involving 5% of the entire subscriber base every time. Over successive assessment periods, the 24-month restriction on repeat testing would further limit the pool of eligible subscribers, making compliance operationally challenging for a small service provider. Therefore, TTL respectfully requests TRAI to consider adopting a uniform, proportionate and statistically representative percentage-based sampling methodology across different categories of service providers. In line with the sampling ratio applicable to operators having subscriber bases exceeding one lakh, TTL submits that a service provider having approximately 10,500 subscribers may be required to test around 100–110 subscribers (approximately 1%), instead of applying the 5% requirement. Such an approach would ensure that the sample remains sufficiently representative for QoS assessment while avoiding a disproportionate compliance and operational burden on smaller service providers having a limited subscriber base.	

19	**Para 14(l) – Schedule-I, Para 6.2.4**	TTL supports the proposed uniform methodology. Sufficient flexibility for grouping tariff offerings having the same declared typical download and upload speeds, as proposed in the methodology, should be retained.	TTL supports the proposed amendment to Para 6.2.4, including the proposed heading "Tariff offerings in which 90th percentile value of measured download and upload speed is ≥ offered typical download and upload speed." TTL also supports the proposed 90th percentile measurement methodology and the provision for grouping tariff offerings having the same offered typical download and upload speeds for measurement and reporting. However, for service providers with a small subscriber base, a group may comprise multiple tariff offerings with significantly different subscriber bases. Certain offerings may have very few subscribers, and some customers may also be unavailable or unwilling to participate in testing at the time of measurement. Therefore, mandatory subscriber selection from each tariff offering in proportion to its subscriber base may not always be operationally feasible or statistically meaningful. Accordingly, TTL requests that mandatory proportionate subscriber selection from each tariff offering within a group not be prescribed. Instead, testing may primarily cover tariff offerings with the highest subscriber base, with the selected offerings collectively covering at least 75% of the total subscriber base of the group. This approach would ensure representative QoS assessment for the majority of subscribers while avoiding disproportionate operational and compliance burden for tariff offerings with very small subscriber base.	CP- – Pages 8, 21–22.
20	**Para 14(m) – Schedule-I, Para 6.3.1**	TTL supports the proposed amendment.	The amendment aligns the nomenclature for Broadband (Wireline) as **"**Fault incidences (No. of faults per 100 subscribers/month)".	CP- – Page 22.
21	**Para 14(n) – Schedule-I, Para 6.3.3: MTTR**	TTL does not support the proposed MTTR monitoring for Broadband (Wireline)	As responded against # 4.	CP- – Page 23; correspondin g MTTR methodology Page 155.
22	**Para 14(n) - Schedule-I Para 6.3.4 (SNO**	Not required	TTSL respectfully requests TRAI to reconsider the proposed SNO reporting and associated customer compensation requirements for Broadband (Wireline) services.	CP- Pages 23-24.

	Reporting & Compensation)		Wireline Broadband networks generally operate through a centralized architecture with built-in redundancy, and outages may be localized to specific network elements or individual connections. Therefore, applying district-level SNO criteria may not always accurately represent the actual network impact. Further, the proposed 20% speed degradation criterion may be difficult to determine objectively at subscriber level, as speed experienced by a customer can also be affected by Wi-Fi, CPE/router, LAN configuration, end-user devices, and other customer-side factors. TTSL also submits that mandatory reporting of all SNOs within 24 hours, followed by root-cause reporting, may involve additional operational and reporting requirements, particularly during major outages when the immediate priority is network stabilization and restoration. With regard to the proposed rent rebate, TTL requests reconsideration, as accurately identifying affected subscribers and determining the actual duration of service impact may not always be feasible. Further, service disruptions may arise due to external factors such as third-party fibre cuts, road/municipal works, utility failures, RoW issues, power interruptions, and other circumstances beyond the reasonable control of the service provider. Accordingly, TTSL requests TRAI to reconsider the proposed SNO provisions for Broadband (Wireline).	
23	**Para 14(o) – Schedule-I, Para 7.1.2**	TTL requests retention of existing timeline or a minimum four-week period.	Responded in Point # 9. The proposed methodology substitutes "four weeks" with "one week". TTL requests retention of existing timeline or a minimum four-week period.	CP- Page 24.
24	**Para 14(p) - Schedule-I Para 7.1.7(ii)**	TTL supports the amendment.	The revised formula on "Refund" improves clarity in measurement of refund of deposits and is acceptable.	CP- Page 24.
25	**Para 14(q) - Schedule-I New Para 8**	TTL requests stakeholder consultation before major modifications.	Since Schedule-I directly governs measurement methodology and compliance obligations, any future modifications through direction or order should be preceded by stakeholder consultation and adequate implementation timelines.	CP- Page 24.