

**COMMENTS ON CONSULTATION PAPER ON ROADMAP TO PROMOTE BROADBAND  
CONNECTIVITY AND ENHANCED BROADBAND SPEED**

[1]

**NEW DEFINITION TO BROADBAND**

The term BROADBAND should be changed “INTERNET x.y” this broadens the scope of the definition wherein “x” and “y” denotes download and upload speed in GB’s respectively.

E.g. INTERNET 2.1, INTERNET 3.1, INTERNET 4.2 and so forth.

.

[2]

As per my comment #1, the existing definition of broadband needs to be redefined afresh.

[3]

The new naming strategy itself defines it’s intrinsic category, therefore to new category need not be defined further.

[4]

It is extremely important to have international standards of Quality of Service (QoS) in terms of contention ratio, latency, packet loss/drops, jitters, round-trip-time, Time to live (TTL) etc. to attain the very ground objective of digital India. The speed of the net depends of multiple factors of active and passive devices e.g. load balancers, firewalls, switches etc. with different policies set within but working in tandem not to mention about the RF transmitters, cables and fibres in the domain of effective functioning. A relative speed measuring technique should built with minimum functioning overhead in every modem and soft speed tester in mobile INTERNET x.y devices. Performance logs and alerts (below thresholds) should managed on-the-fly and retrievable for post-facto analysis.

[5]

Apparently the RoW 2016 seems inline with the prima facie requirements of ICT, it is also necessary include a charter to time bound tribunal role in the present scenario.

[6]

Any other layer will intricate the process and have an overall delay in the process.

[7]

With the changing of core technology and the roles should be reviewed / amended to align with the trends. As mentioned in my comment #5 to include a charter to a time bound tribunal role be completed. The

[8] All the disputes settled should be published in the public domain immediately on issuance of the verdict.

[9]

Centre plays a vital role to build a cohesiveness between the state and local bodies in a non ubiquitous institutionalised model of rolling out RoW at the state levels, a working committee from the three levels should oversee the roll out. Similar to functioning of

Railways, NHAI, Power Grid GAIL etc. A continuous evaluation and resolving of localised problems with the help of respective state CM's as a statutory figure of eminence /chairperson will ease out the rollout process to significant extent.

[10]

Additional standing committee in my comment #9 is referred to as working committee.

[11]

New laying of common ducts is time consuming, expensive, difficult to maintain and prone malicious activities. Instead we need to make use of existing network of railways, power lines and satellites. More emphasis be give on microwaves and similar wireless mode of non contented communication.

[12]

India being a diversified topographical country should avoid the duct concept and use the already stable networks mentioned in my suggestion #9 as the networking infrastructure.

[13]

As mentioned in my consultation #9, the ducts will attract these inherent intricacies therefore should be avoided.

[14]

A joint committee comprising of Nationalised bank/s and local municipality will jointly submit a report within a time limit to avoid any situational advantage. Land acquisition during metro rail setup can be referred. This activity should be brought under mission digital India initiative.

[15]

Any country in the technological parlance will not seem prudent to develop infrastructure development in silos. As mentioned in my consultation #9 sharing of resources in place will be most cost effective and expedited means of Infra development.

[16]

This is non-feasible in terms of speed, cost effectiveness and maintenance.

[17]

This is non feasible in terms of speed, cost effectiveness and maintenance as stated in my suggestion #16.

[18]

Cross sectional support should come under an umbrella / apex body e.g. DoT to extend/monitor the infrastructure sharing, revenue sharing, governance and sustain the changing infrastructure in the long run.

[19]

This infrastructure and its related assets can be collaterally used in [a] Defence [b] Aviation [c] Disaster control [d] Metrology [e] Clinical research [f] DRDO [g] Smart Cities to name a few among the many.

[20]

Referring to my comment #9, the concept of duct is not a cost effective and a viable answer to the need of the hour.

[21]

Data access in mobile broadband per se is expensive, slow and inconsistent. The other cause is the fast draining of battery and uneasiness in screen manoeuvring owing to web page designs. On overcoming these above difficulties the usage of mobile broadband will certainly increase.

[22]

India is still a developing country with per capita income is lower to the world standards. The basic amenities is in scarce and BROADBAND ranks far below to these basic needs. The spread of fixed BB is low and requires network devices and power for accessibility therefore the spread is not as expected. The response to restoring of services is also poor.

[23]

Fibre-To-The-Home (FTTH) is still at its infancy. It is expensive and the spread is limited to few metropolis with on-premise device/s with power connectivity is required. Moreover very few players extend this service and enjoy a monopoly. Over a period unless effective value addition and lowering of cost is attained it will not flourish great and slow down as we have seen DTH services.

[24]

Personally I have faced the poor services of LCO having extremely inconsistent services without any accountability. LCO use outsourced infrastructure to extend the last mile, this leads to disputes and frequent outages with any prior intimations whatsoever. The service maintenance teams are under equipped and technically poor.

[25]

We must remember that India is world most densely populated and unplanned country. Offlate the planning is in vogue but the FWA is limited to the last mile only, the back haul requires some form of cables to be laid. Only wireless network work will be successful in India, any form of cable laying has proved utter failure time and again. A Ericsson's 5G Consumer Potential study, 8 out of 10 consumers respondents to the study said that they will start watching YouTube and Netflix in 4K and will increase downloading of HD video content once 5G becomes available. This hints a clearly indicates the potential of FWA (more on mobile) will penetrate more into the Indian BB market.

[26]

The uncanny allocation of excess contention ratio, overloading on the core network and absence service monitoring and poor rendering of service restoration at the critical junctures led to a below average performance of broad bands.

**[27]**

There is an urgent need to formulate a policy and consumers regulatory forum preventing non abating measures to adhere the of Service (QoS) in terms of contention ratio, latency, packet loss/drops, jitters, round-trip-time, Time to live (TTL) with an impending penalty mechanism in place.

**[28]**

This is an absolute necessity to the TSPs and ISPs with online customer feedback that can be fully back tracked.

**[29]**

The cost reduction is technique invokes cheap quality / pre owned devices compromising on QoS. RAN is not monitored and network setting and maintenance is outsourced to vendors of quack knowledge. This results the overall fiasco.

**[30]**

This is an absolute necessity to automated checks and controls be set up on the vital parameters of the network performance and be tracked and logged in the continuous automated process.

**[31]**

It is very important to maintain a QoS on each uplink & down link frequencies, Quadrature Amplitude Modulation (QAM), Radio Network Controller (RNC) in a reactive proposition as of now in post-facto event analysis. The data of performance on-the-fly (Real Time) and should be available to the customers and logged appropriately for the month.

**[32]**

Consumer device/s must confirm to certain preset parameters by DoT prior to get enrolled as a broadband customer. These are the Device model & Media Access Control Address (MAC) details, IMIE number, OS etc. to help in monitoring the device remotely with self diagnostic tools mandatorily downloaded from ISP.

**[33]**

To improve the overall BB service in India, as mentioned in my consultation #32, Consumer device/s must confirm to certain pre-set parameters e.g. Long-Term Evolution (LTE) radio access technology, IP Multimedia Subsystem (IMS) by DoT prior to get enrolled as a broadband customer. These are the Device model Consumer device/s must confirm to certain pre-set parameters by DoT prior to get enrolled as a broadband customer. These are the Device model. This remain as a prima-facie responsibility of the consumer to develop the broader sense of Digital India with an improvement of BB services.