

From: Chethan S <[chethan@telecomtalk.info](mailto:chethan@telecomtalk.info)>

I am writing to you after having read Airtel's response to TRAI's call for comments on the consultation paper *Draft Direction under section 13, read with clause (b) of sub-section (1) of section 11, of the Telecom Regulatory Authority of India Act, 1997 (24 of 1997) to service providers for delivering broadband services in a transparent manner by providing adequate information to broadband consumers.*

I am concerned about the proposed revisions by Airtel in **Clause 4 (c)**, wherein Airtel makes the argument to fix the post FUP speeds to 64 kbps. In plain terms, this must be regarded as a retrograde measure and must not be accorded any merit. A speed of 64 kbps would mean going back to the dial-up internet era.

Speaking about why Airtel's proposal must not be considered -

- 1. When smaller ISPs can, why can't larger ones?** Several smaller players like ACT Fibernet, Hathway, YouBroadband etc. are able to provide great speeds to their customers at reasonable price bands.
  - ACT, for instance, offers a 10 Mbps plan at ₹650 + taxes with a 50 GB FUP and 1 Mbps post FUP speed. ACT's basic plan that offers 512 kbps post FUP speed offers an FUP of 35 GB.
  - In contrast, similar plans with Airtel, BSNL and such ISPs which are operating PAN India would easily cost over ₹1000. The speeds and FUP limit would be much lower too. If CapEx is higher for a PAN India presence, so are the number of consumers. As the number of users grows, costs come down.
  - Interestingly the same PAN India ISPs (Eg. BSNL in several AP and Telangana cities where ACT has a presence), offer comparable plans as other private players. Where goes the theory of misuse, costs etc. then?
- 2. Where is the minimum speed guarantee?** It is a fact that hardly any customers of PAN India ISPs are experiencing promised speeds. It's high time that TRAI take this up for an audit. ISPs must be held responsible for some minimum quality guarantee.
- 3. The misuse theory:** For a moment, if we believe Airtel's theory that customers are misusing the 512 kbps speeds, why can't they identify such customers using some modern day analytics. Those customers could be encouraged to upgrade their plans instead of downgrading the entire customer base!

In addition to disregarding Airtel's submission, I would urge TRAI to -

1. Revisit the broadband definition every year and change it with technology changes. After all, every ISP boasts about FTTH, 4G, next generation networks etc.
2. Just like audits are conducted for wireless networks, there can be audits for wired broadband too

Thanks,

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