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Subject: Consultation Paper 06/2020 - Comment & Suggestion as Consumer

To
The Concerned Person
TRAI
Mahanagar Door Sanchar Bhawan,
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New Delhi – 110002

Sub :- Comment & Suggestion as Consumer on Consultation Paper 06/2020

Respected Sir,

This is with reference to your invite to send comment & suggestion on Consultation Paper 06/2020 about Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed.

Kindly find the following as my suggestion on the subject as consumer.

Q. 1. Should the existing definition of broadband be reviewed? If yes, then what should be the alternate approach to define broadband? Should the definition of broadband be:

Yes, we need to review the existing definition of Broadband.

However its not practical for slower moving government agency to keep on reviewing broadband definition based on technology used to provide the internet services since every couple of years we may have a new technology in place and its not practical for a government body to keep on revising their definition of a service or speed that quickly.

Broadband is a term for Internet Speed. This is no need to attach or redefine that term via means of delivery, Fixed or Wireless, which ever the mean of internet delivery, Broadband should be treaded as independent term.

Definition of Broadband should only be based on data transfer rate. There is no need for a regulatory body to create multiple definition or standard for different broadband connection.

If you may please look at the present plans & advertisement of all the ISP, there is no confusion between consumers about which speed connection they are buying. So ISPs should not be regulated by asking them to meet certain broadband terms as criteria to create and design their plans.

As a country, India should define broadband based on its need & usage of the internet. My suggestion to define broadband as a connection (regardless of wired, fiber, mobile, satellite or any other means of delivery)

- Minimum 10 megabits per second download
- Minimum 2 megabits per second upload
- Latency to ISP Getway Server (connecting node) under 50 milliseconds
- Live (Tire-1) IP Address

Above mentioned criteria (apart from live IP address) are already met by all the ISP. There would be no issues or capital expenses for any ISP to meet this new definition. These speeds are at lower end of the connection capabilities of all the ISPs (be it mobile or wireline) but they are technically & practically good enough for most of the consumer usage (be it Netflix streaming or attending online Video conference or education class)

Q.4 Is there a need to introduce the speed measurement program in the country? If yes, please elaborate the methodology to be implemented for measuring the speed of a customer's broadband connection. Please reply with respect to fixed line and mobile broadband separately.

Its an absolute urgent need to have a strong & effective QoS (Quality of Service Policy).

All the ISPs, based on their user number should be asked to contribute financially & with related infrastructure to create a measurement program.

If you may notice, in anyway, all the ISPs are turning to an overseas private firm called Ookla to use their service of speedtest.net where users can test their data transfer rate. This method allows Ookla to host their code (software) in respective ISP node & allows the end users to reliably test connection speed via Ookla app (available for all mobile platform) or browser based website.

This type of method eliminates the issues of slow performing certain website which may falsely indicate a slower connection to the user & allowing the testing software to be hosted at ISP node allows the ISP to showcase their actual performance since in this method, only thing effecting the user speed would be (1. Last mile connectivity & network congestion)

I suggest TRAI to follow similar method to create their own software & ask ISPs to allow their respective local node to host the script for user testing. Present TRAI app for speed testing is hosted by TRAI and its technically not right way to speed test.

Q.21 Even though mobile broadband services are easily available and accessible, what could be the probable reasons that approximately 40% of total mobile subscribers do not access data services? Kindly suggest the policy and regulatory measures, which could facilitate increase in mobile broadband penetration.

I am sorry to say from consumer standpoint that mobile broadband service isn't easily available or accessible.

There is heaven n hell difference between statistics & on ground reality.

Statically speaking, even a single PING of 32 bytes to ISP node will make a mobile device internet enabled. Any android or iOS device left alone overnight may use up some data as background tasks thus registering itself in statistics as mobile data user. This 60% mobile internet data user is fundamentally wrong. The number is much lower when you consider actual human use.

Without a strong QoS policy consumers are left with virtually dead connections on their mobile devices. Mobile ISPs are absolutely pathetic on their approach towards solving Quality of Service complains and no user would adopt such an unreliable service for any important task.

ISPs must be penalised for failing to meet minimum QoS.

Internet adoption is by choice, TRAI should only facilitate the field for fast and reliable data flow. Users will find their own need for usage and statistical numbers will grow automatically.

Q.22 Even though fixed broadband services are more reliable and capable of delivering higher speeds, why its subscription rate is so poor in India?

There are two main driving factor against adoption of fixed line broadband.

Firstly, data capping. Users are already having trust factor and high usage issue with mobile internet data caps. Around the wrong, no fixed line ISP gives data capping on their plan but in India, many major ISPs are capping

(limiting) monthly or daily usage based on volume.

Secondly, reach of fixed line broadband is very limited. Its even smaller for true unlimited or data cap free ISP service area.

Lastly, the capital expenditure. Installation of fixed line broadband feels expensive.

Q.23 What could be the factors attributable to the slower growth of FTTH subscribers in India? What policy measures should be taken to improve availability and affordability of fixed broadband services? Justify your comments

- Data Capping
- QoS
- Capital Expenditure

Internet aware citizens will not subscribe with Volume based restrictions. Secondly there is no consumer protection on poor QoS (quality of service).

Encourage ISPs to remove volume based restriction on fixed line and urgently create tougher rule & strict punishment for poor QoS

Q24. What is holding back Local Cable Operators (LCOs) from providing broadband services? Please suggest the policy and regulatory measures that could facilitate use of existing HFC networks for delivery of fixed broadband services.

Any business needs return of investment and previous experience of cable operators with TRAI has been really poor. Specially with STB and pay channel concept. DTH has already reduced earning of cable operators and STB pay Channel concept has left them with very little scope for investment.

Cable operators needs a competitive place to purchase bandwidth, receive technical support & assurance on policy allowing them to recover the huge expenses for running the business.

Large Cities are already having cable operators creating their own agreement with different ISPs to provide internet plans but smaller cities and rural operators needs government run bodies like Railtel, BBNL, BSNL to provide them the backhaul backbone (at a competitive rate) and they (LCO) can maintain the last mile & front end customer service.

Q.25 When many developing countries are using FWA technology for provisioning of fixed broadband, why this technology has not become popular in India? Please suggest the policy and regulatory measures that could facilitate the use of FWA technology for delivery of fixed broadband services in India.

I am sorry to say but you are comparing two completely different technical challenges. Its not just about backend technical challenge, but one must look at the front end too.

Indian user volume isn't suitable for FWA, plus the capital cost to consumer (specially rural) is simply unaffordable.

FWA technologies may be used by ISPs for backend but not practical for end users.

Q.26 What could be the probable reasons for slower fixed broadband speeds, which largely depend upon the core networks only? Is it due to the core network design and capacity? Please provide the complete details.

Q.27 Is there a need of any policy or regulatory intervention by way of mandating certain checks relating to contention ratio, latency, and bandwidth utilisation in the core network? If yes, please suggest the details. If no, then specify the reasons and other ways to increase the performance of the core networks.

Statistics doesn't paint the actual picture.

If an user is internet enable, definitely that user is in social media. If that user has access to social media, first thing he or she would do is rant / complain there about any issue. Specially when we don't have any telecom ombudsman, ISPs are bullying users in closing unsolved complains.

Scout the social media, ask for public view.

Number of QoS (speed or performance related) complains are really low for fixed line internet connections. ISPs are doing good job on meet advertised plan speeds (expect few)

Reason for low stats on overall speed is the available plans.

Apart from large cities, entire rural India or smaller towns are stuck with BSNL ADSL. If you may notice my answer to question no.22, internet users will never buy a fixed line plan with data capping. So vast number of the fixed line customers are selecting low bandwidth but true unlimited plans.

TRAI must step in to first force the ISPs to include minimum speed. They are presently showing "upto such mbps" and using the loophole to provide lower speeds.

TRAI should create telecom ombudsman to solve & penalize ISPs for their malpractices. There is no need for oversight inside an ISP and its technical operation. TRAI must focus in timely resolution for customer complains and presently customers have no rights when ISPs bully them by closing a complain without resolving it. Happy consumers with push more people to adopt and competitive market will correct the ISPs automatically.

TRAI must consider its own advance speed testing application (refer to answer of question no. 4). Which will give a better, easy and effective performance picture for both ISP and users. This will help ISPs to avoid unnecessary complains and also give users a fair service.

Q.28 Should it be mandated for TSPs and ISPs to declare actual contention ratio, latency, and bandwidth utilisation achieved in their core networks during the previous month to their customers while communicating with them or offering tariff plans? If no, state the reasons.

There is no need and revealing some data may create security risk and defiantly this will be hurting business interest of ISPs.

TRAI doesn't need to interfere here, TRAI needs to setup and get involved into telecom ombudsman. TRAI only needs to ensure satisfactory & time resolution for customer complains. Industry will fix itself once its forced to take measures to resolve customer issues. Specially Quality of Service.

Q.29 What could be the probable reasons for slower mobile broadband speeds in India, especially when the underlying technology and equipment being used for mobile networks are similar across the world? Is it due to the RAN design and capacity? Please provide the complete details.

Q.30 Is there a need of any policy or regulatory intervention by way of mandating certain checks relating to RAN user plane congestion? What should be such checks? If yes, then suggest the details, including the parameters and their values. If no, then specify the reasons and other ways to increase performance of RANs.

Q.31 Should it be mandated to TSPs to declare actual congestion, average across the LSA, recorded during the previous month over the air interface (e.g., LTE Uu), in the radio nodes (e.g., eNB) and/or over the backhaul interfaces between RAN and CN (e.g., S1-u), while reaching out to or enrolling a new customer? If so, then suggest some parameters which can objectively determine such congestions. If no, then specify the reasons and other ways to increase performance of the RAN.

Slower Mobile Broadband speeds are primarily due to lack of consumer rights.

It's completely impractical for an end user to fight a legal battle for poor service of mobile operators in India.

Yes, of course, there is a density problem due to a vast number of users saturating the capacity of a particular zone, tower access point or even the entire backhaul of a section for an ISP.

But these aren't the things TRAI needs to be concerned about. How will a business design their network shouldn't be the concern of TRAI. If a poorly designed network can keep users happy, who is TRAI to interfere in that business?

TRAI needs to set up strong Quality of Service Rules. TRAI must set up a telecom ombudsman to stop ISPs bullying consumers by closing complaints without solving them.

TRAI must direct ISPs to follow Color Coding their serviced area to meet minimum speed guidelines. It is very much true that in India it's really hard not to get saturated by volume of users in close proximity. But consumers need to know the performance of their ISP beforehand.

TRAI must not force ISPs to disclose technical details since it's not possible for customers to understand those technical data pointers. TRAI must force Mobile ISPs to adopt area-wise color coding of their performance

- Green (good network strength, above minimum stipulated speed)
- Yellow (good / ok network but congestion forcing below minimum stipulated speed)
- RED (poor or no coverage network, internet may not work)

Let the mobile ISPs decide on their minimum stipulated speed. But it must be above national broadband definition.

Q.32 Is there a need of any policy or regulatory intervention by way of mandating certain checks relating to consumer devices? If yes, then please suggest such checks. If no, then please state the reasons.

There is no need for TRAI to intervene here since the industry is already standardized in many aspects. Device makers (radio modem chips) and network backhaul makers are making compatible devices since a few decades now. If a device isn't compatible in India and its operational frequencies, it won't sell at all.

Q.33 To improve the consumer experience, should minimum standards for consumer devices available in the open market be specified? Will any such policy or regulatory intervention have potential of affecting affordability or accessibility or both for consumers? Please justify your comments.

There is no need for TRAI to regulate the market in this regard. Let the businesses and consumers sort it out. If there is any need, that's with oversight to prevent false advertisements and strengthening the consumer law for faster resolution for consumer disputes.

Conclusion

To sum up the points and suggestions, there are only a few basic things that TRAI needs to do urgently.

First & most important thing to do is having satisfied customers. Since in a market based open economy, if consumers are empowered with strict & effective consumer rights law, competitive market will automatically improve the service.

- Redefine Broadband (10 megabits per sec download / 2 megabits per sec upload / under 50ms latency)
- Redesign and deploy TRAI Speed Test service hosted under individual local ISP nodes (just like Ookla)
- Deploy Minimum QoS rule for ISPs, where ISP mandatorily mentions minimum speeds along side of their present "upto" plan advertisement.
- Create a powerful Telecom Ombudsman to resolve pending or ignored consumer complains along with strict penalty for ISPs on malpractice of ignoring consumer complains.
- Ask mobile ISP to publish their network performance heat map with Green, Yellow, Red zones

I thank you and their TRAI department for giving me the opportunity to express my views and suggestions.

I would also like to take this opportunity to thank TRAI for upholding consumer rights by implementing such a powerful net neutrality law.

I wish TRAI best of luck & I look forward to a constructive and fruitful regulatory oversight from TRAI in this sector.

Thanking you,
Yours Faithfully,

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