

From: **Sushubh** <sushubh@broadbandforum.co>

Date: Jan 31, 2016 10:31:20 PM

Subject: Comments on: Draft direction on delivering broadband services in a transparent manner

To: kapilhanda@traigov.in

To,
Sh. Kapil Handa,
TRAI,

Sir,

Thank you for giving me the opportunity to share comments on "Draft direction on delivering broadband services in a transparent manner".

I'm Sushubh Mittal, and I represent the online community broadbandforum.co. My responses are as stated below

Response regarding:

Comments on definition of Broadband in India

National Telecom Policy – 2012 recommended minimum broadband speed to be increased to 2mbps by the year 2015. This never happened. I think we have reached a stage where 2mbps is not enough to handle basic internet services at optimal performance. My suggestion would be to set it at 4mbps download and 1mbps upload (or the top speed network is capable of in case of DSL which has technical limitations) for wired broadband connections as most internet service providers end up selling plans offering higher speeds for only a few GBs forcing the user to end up with minimum allowed speeds for the rest of the month. Plus the 80% regulation means that they would still be able to get away with by offering just 3.2mbps on a 4mbps connection to the end user.

Comments on Fair Usage Policy and transparency in alerts

I understand that fair usage policies are a necessary evil. This is why TRAI needs to ensure that minimum broadband speed is set at a level that allows the user to access the internet/web-services at reasonable speeds at all times on wired connections. I further recommend that TRAI should make it mandatory for the ISP to clearly state both upload and download speeds pre/post fair usage policy to the end user. This should apply at the time of applying for a new connection and in all communications (bills etc.) for zero confusion. Right now, companies like Airtel are offering 100mbps plans but the speeds are only applicable on downloads because the upload speeds are still restricted at 1mbps which are not revealed to the customer.

Comments on alerts given to subscribers regarding fair usage policy

I am in favour of alerts that are delivered through non-intrusive mediums like email and text. And user should be able to opt-out of either or both in case the alerts becomes a nuisance. User should also be able to access his usage on demand through a web portal. And ISPs should be instructed to ensure that usage is accurate. User should also be able to get on demand detailed data on the usage in case there is any discrepancy found. Customers of both Airtel and ACT have reported on our community that the usage shown by the ISP is nowhere close to their actual usage and there is no option available to them to challenge that.

Other comments on broadband in India

I would like to raise a specific issue here. Both BSNL and MTNL broadband are injecting ads in browser sessions of their paying customers. The companies claim that the system is designed to deliver service messages and alerts and ads are additionally inserted to benefit the customer. I find this behaviour dangerous because of various reasons:

- 1.They are tampering with user's internet connection.
- 2.They are profiting from ads delivered through this medium. I have seen incidents of Snapdeal ads appearing on Flipkart website. As a web publisher myself, this behavior is completely unjustified as businesses can pay MTNL/BSNL to push their ads on their competitors website. This should be treated as a case of cybercrime where MTNL/BSNL are acting as intermediary hackers.
- 3.Users are not informed of this 'feature' at the time of connectivity.
- 4.This is a security and privacy nightmare as there is no information on who has access to this technology and the data collected. This system could be hacked and malware could be injected in user's streams in the future.

5.MTNL and BSNL are not offering subsidized internet services that needs to be supported with ads. Using man-in-the-middle attack to deliver ads and popups and claiming that these messages are for the benefit of the customer is unreasonable behaviour and should not be allowed.

In addition, BSNL is also randomly redirecting the user to their webmail page without any user intervention. This also becomes a problem when user loses the connectivity during an online activity as the browser redirects him to BSNL website interfering with what he was doing at that time.

I plead to TRAI to look into this matter and set a clear policy prohibiting any ISP to tamper with the internet stream of their customers even if it is solely used for service messages and other alerts. This behavior is similar to what malware hackers do to lure web users into leaking their personal data. This is a massive breach of user's trust and should not be allowed under any circumstance. ISPs already have access to multiple mediums through with service alerts could be delivered to the end user (email, sms, postal address, their own website).

Regards

Sushubh Mittal

sushubh@broadbandforum.co
broadbandforum.co