



**F.No. TRAI Corres/QoS-data/2014/T05**  
**5<sup>th</sup> May 2014**

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**Advisor (CA & QoS)**  
Telecom Regulatory Authority of India,  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg,  
Old Minto Road, New Delhi – 110 002

**Subject: Response to TRAI Consultation Paper on Amendment to the Standards Quality of service for Wireless Data Services Regulation, 2012.**

Dear Sir,

This is in reference to your Consultation Paper No. 3/2014 dated 21<sup>st</sup> April 2014 on 'Amendment to the Standards Quality of service for Wireless Data Services Regulation, 2012'.

As desired, we hereby enclose our response to the questions raised in your above-mentioned consultation paper. We sincerely hope that our views would be given due cognizance.

Thanking you and assuring you of our best attention always.

Yours sincerely,

**Anand Dalal**  
**Senior Vice President – Corporate Regulatory Affairs**  
**Tata Teleservices Limited**  
**And**  
**Authorized Signatory**  
**Tata Teleservices (Maharashtra) limited**

Enclosure: As above

**CIN - L64200MH1995PLC086354**

**CIN - U74899DL1995PLC066685**

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**Tata Teleservices response to TRAI consultation Paper on  
Amendment to the Standards Quality of service for Wireless Data Services Regulation, 2012**

**1. What are your views on prescribing benchmarks for minimum download speed?  
Please give your comments with justification.**

As per the current requirement of reporting, we believe that the operators are meticulously adhering to the reporting standards of the said report with TRAI, we are therefore not in favour of introduction of any benchmark for minimum download speed. Also, it is important and pertinent to mention that actual speed of the packet data mainly depends on multiple factors which are generally uncontrollable and dynamic in nature such as time of access (peak/off peak time), natural disturbance (rain, thunderstorm, floods, etc), number of simultaneous users, low coverage area, location of the customer, kind of device being used, technical factors like website behavior, content downloaded as it could be an audio or video file, etc.

Also, we understand that internationally, no regulator has prescribed a minimum download speed/set such benchmarks and has left it to the operator's discretion to adopt a measurement methodology that best reflect their operating environment and conditions. Hence it will not be justifiable to prescribe the minimum download speed for any particular technology or plan.

We are in complete agreement of not being in favor of introduction of any benchmark for minimum download speed due to the following reasons:

- 1) Test results are taken from the test server by downloading/ uploading a file. Whereas, the customer access the internet under different scenarios and circumstances.
- 2) The speed proposed in the consultation paper is under lab conditions and the actual speed experienced by the customer in field conditions varies. Entire Network Design would be impacted in case these benchmarked speeds are to be guaranteed and the available spectrum is insufficient for the same as well. The same would make the costs as unviable for both operators and the customers.
- 3) Prescribing benchmarks on the basis of test results conducted under a few real time traffic conditions (Time Consistent Data Busy Hour) is not the appropriate approach. There are many more factors that are detrimental to the actual user experience.



Therefore, based on above, applying any such test results to prescribe a benchmark is not justified.

- 2. Should the service provider be mandated to inform the minimum download speed to customers along with each tariff plan? Please give your comments with justification.**

We request the Authority not to mandate the service providers to inform the minimum download speed to customers along with each tariff plan due to the fact that all the service providers do not have their presence in all service areas/ geography. They are dependent on other operators for provision of telecom services including data services.