

Hathway/ISP/TRAI/LT/15-16/0077

Dt. 01st Feb 2016

To,

Shri Arvind Kumar

Advisor -NSL

Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahal Lal Nehru Marg,
New Delhi – 110002

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

Dear Sir,

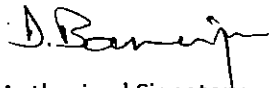
Kindly find enclosed herewith the comments of Hathway Cable & Datacom Ltd. on the aforesaid subject with reference to provisioning of Fixed Wire-line Broadband Services.

We hope that Authority would find merit in our submission and consider our reply before finalizing the amendment to the Direction.

Thanking You,

Yours Sincerely,

For, Hathway Cable & Datacom Ltd.



Authorised Signatory

Hathway Cable & Datacom Limited

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Comments of Hathway Cable & Datacom Ltd. on TRAI's Draft Direction on Delivering Broadband Services in Transparent Manner.

Hathway Cable & Datacom Ltd. hereby welcomes the efforts and initiatives taken by TRAI to protect the interest of the Service Providers and also that of the telecom consumers and we are thankful to the Authority to provide us an opportunity to present our views and hope they shall be taken into consideration before finalizing the amendment to the Direction.

Further, with an assurance to the Authority that, as a responsible Service Provider, Hathway Cable & Datacom Ltd. is committed to put forward the best possible efforts in initiatives to exceed customers' expectations and hereby take this as an opportunity to submit our comments as below.

(a) Provide on their website and also in all advertisements published through any media, the following information in respect of all broadband tariff plans offered under Fair Usage Policy (for wire-line broadband services):

- (i) Data usage limit with specified speed;
- (ii) Speed of broadband connection upto specified data usage limit; and
- (iii) Speed of broadband connection beyond data usage limit;

Our Comments:

We agree to TRAI's recommendation of providing the details for broadband tariff plans offered under Fair Usage Policy on the website, the data usage limit with specified speed, speed of broadband connection upto specified data usage limit and speed of broadband connection beyond data usage limit.

The same may also be mentioned on the tariff brochures and leaflets and any other printed media for better understanding and bringing transparency to the customers who wish to avail the fixed broadband connectivity so as to enable them to choose the tariff plan wisely based on their requirement.

(b) Provide information specified in para (a) above to both new and existing subscribers on their registered email address and through SMS on their mobile number registered with the service providers;

Our Comments:

We support TRAI's view on bringing transparency and clarity on the tariff information and applicable charges being provided to the customers and wish to inform that we have devised an internal process wherein within seven working days from activation of broadband connectivity, our customer service executive call the customer on their registered telephone number wherein they are explained the details pertaining to broadband tariff plans availed by them including the information related to data usage limit, broadband speed related details and information related to fair usage policy etc. Further, the information is followed by an email to the customer on the registered email id for records.



However, we feel that providing such details through SMS should not be mandated considering the size constraint and limitations related to number of characters supported by SMS and hence may be made as an optional.

Considering the above we submit the following as an amendment

1. **A welcome email can be sent to new customers on their registered email id within seven working days from the date of activation of Fixed Broadband Tariff plan which shall contain details of Tariff availed along with contact details of customer care. Further, details through SMS should be made optional and non to be mandated.**
2. **Service Providers may do tele-calling to new customers within seven working days from activation of Broadband Connection wherein such information may be explained to the customer over telephone.**
3. **In case of existing customer, a quarterly email may be sent on their registered email id wherein such information can be provided to them for their reference. Also, an email can be sent as and when tariff plan is changed as per the customers' request.**

(c) Ensure that download speed of broadband service provided to the fixed broadband subscriber is not reduced below 512 kbps in any broadband tariff plan;

Our Comments:

Agreed

(d) Provide alert to the subscriber when his data usage reaches eighty percent of the data usage limit under his plan and ensure that such alert is provided to the fixed broadband subscriber at each login after data usage crosses the said limit of eighty percent;

&

e) Send alert to the subscriber either through SMS or Unstructured Supplementary Service Data (USSD) on his mobile number, registered with the service provider or to his registered email address, each time when the data usage by the subscriber reaches eighty percent and hundred percent of the data usage limit under his plan, and furnish compliance report by the (date).

Our Comments:

We propose that a subscriber may be provided with an alert when his data usage reached 80% of the data usage limit. Such an alert be provided to the subscriber by an SMS to his registered telephone number and on email so that the subscriber can manage his usage accordingly. Further, another SMS or email may be sent to the subscriber once he reaches 100% of the data limit with information about applicability of change in download speed on further usage. It is also proposed that instead of sending information to customer about the usage details after every login, customer may login into his account on the service providers' website to check his data usage which will provide him a flexibility to plan the his data usage accordingly.

We hope that Authority would find merit in our submission and consider our reply before finalizing the amendment to the Direction.