Subject: Response to Consultation Paper on Network Testing before Commercial Launch of Services

To,
Shri Sanjeev Bansal, Advisor
(Networks, Spectrum and Licensing),
TRAI

Sir,
Please find my response below on consultation paper

Q1. Should a TSP be allowed to enrol subscribers as test users and in such case, should there be any restrictions on the number of test SIM cards and the period of such use? Please justify your response.

Testing of network before commercial is definitely one of important areas for ensuring QoS and TSP's should be enroll subscribers as test users.
If we can use end users for market research to understand their need, it is equally important to connect with them again before launch of services.
However, to avoid any commercial exploitation of this policy, it is important to hard cap number of Test SIM per TSP per circle. TSP's maybe allowed test SIM proportional to size/ population/expected subscriber's base per circle. While this whole concept of circles in India is a questionable thought in fast changing data based market, however that is a different topic of discussion
Period of network testing by end users can be capped for 3 months since that is good time frame for any insights /bugs to be collected and rectified. Any points from TSP on ensuring 100% compliance on testing and QoS is overhyped and should be avoided.

Q2. To clearly differentiate test phase from commercial launch, which of the options discussed in Para 1.12 would be appropriate? Please provide justification. Please explain any other method that, you feel, would be more appropriate.

Most of the points expect point D may be considered.
Allocation of test SIMs can be proportional to size of circle
Provision of service and QoS are important to differentiate from commercial launch. While it is given that TSP will adhere to regulations, MNP has been seen offlate as exploitation technique to porch subscribers from rivals before launch. MNP and Regulations are factor which anyway will be tested after commercial launch and can be taken care of beyond testing phase. Hence point A may be relevant

Q3. Do you agree that the provisions discussed in Para 1.13 viz. information to the subscribers about test SIM being temporary etc., should be put in place for the TSP testing its network involving test users/subscribers? Please suggest other provisions which should be mandated during test phase?

Para 1.13 is a very fair and rightly suggested point. Besides the points, test users may be provided with Data cap (it can be 4-5GB) but not more. Since most of the competition is around data, network testing can be abused by TSP. Limited will help TSP to test their network to greater extent while also ensuring they adhere to rules of the game.
Besides, deactivated test SIM shall not be allowed to be re-activated. Once test time is over, SIM has be to discarded.
Testing SIM should be compatible with SIM slot 2 of the phone and user should not be forced to put test SIM in SIM slot 1 of the phone.

Q4. Is there a need to have a defined timeline for testing phase i.e. period beyond which a TSP should start offering commercial services? If yes, what should be the timeline? Please justify your response.

Answer is Definitely Yes!. Offlate Indian market has been data services being launched in disguise of Testing phase. In order to keep competitiveness intact, defined timelines will also help in ensuring that players seriousness in adhering to timelines as committed at time of license application.

Q5. In case enrolling of subscribers as test users before commercial launch is allowed, whether subscriber related conditions and regulatory reporting requirements laid down in the license, be imposed for the test subscribers enrolled before commercial launch? Please provide justification to your response.

Looking at current national security need, it is very important to ensure regulatory reporting is maintained and followed. It will also help in tracking any misuse or abuse of testing phase by TSP

Q6. Should test users/subscribers of such licensees be given the facility of MNP? Please justify your answer.

Key agenda for providing Test SIM is for network testing and QoS, and Test SIM should only be reserved for the said purpose.
There is no potential use case expect porting for providing MNP facility to test users. TSP should stick for networking testing only as part of testing phase

Q7. If there are any other issues/suggestions relevant to the subject, stakeholders may submit the same, with proper explanation and justification?

It is being noticed that TSPs submit network testing report and compliance report for getting approval for launch, however post launch, most of network QoS is not maintained.

It is important to link KPIs of network performance of TSPs to what was signed off and submitted as part of testing phase.

From:
Priyank Chandra
Telecom Strategy Consultant with Leading MNC