R B Sahajpal

as individual

Counter Comments

Trai Draft Regulation[1]PR[2]

Introduction:

1. "Note. — The Explanatory Memorandum explains the objects and reasons of the "Telecom Regulatory Authority of India Repealing Regulations, 2022".'.[3]

(i) Earlier "The regulation on quality of service of dial-up and leased line internet access service, 2001 (4 of 2001) was notified on 10th December 2001"[4].

(ii) "(ii) This regulation shall be applicable to all the Basic Service Operators and Internet Service Providers including the incumbent operators viz. BSNL, MTNL and VSNL"[5].

(iii)"(iv) 'Regulation' means the Regulation on Quality of Service of Dial-up and Leased Line Internet Access Service notified by the Authority under the 'Act'."[6].

(iv)"Only BSNL was reporting the dial-up subscribers until March'2021 and afterwards BSNL was also not reporting any dial up subscribers. BSNL vide letter no-BSNLCO-RGLN/24(15)/1/2020- REGLN dated 13-04-2021, has also submitted a certificate to the Authority, stating that no dial up subscribers exist in their network, as on date."[7].

Conclusions:

2.The Regulation proposed to be Repealed included **'dial-up'** and **'leased line'** internet service as per 1(i) above.

3. TRAI has obtained "no dial up subscribers exist in their network" from BSNL only as per **1(iv)** above.

Accordingly:

4. The certificate that "no dial up subscribers exist in their network" from all other other Basic Service Operators and Leased Line Access Service included **1(i)** above may also be obtained.

Suggestions about the proposed 'Repealing Regulation'

The following is submitted for kind consideration please:

5. The proposed Regulation may issued as 'The regulation on quality of service of **internet access service**, 2023 (--- of 2023)' by deleting Dial-up' and 2001 from all places in the existing Regulation 2001 (4 of 2001).

6. 'Section IX:10. Regulation 2001(4of 200) is repealed', may please be added.

References

1. https://trai.gov.in/sites/default/files/Draft_Regulations_03042023_0.pdf
2. https://trai.gov.in/sites/default/files/PR_No.32of2023_0.pdf
3. Explanatory Note page 2/4 supra '1'.
4. https://trai.gov.in/sites/default/files/201112090226515327500nreg.pdf
5. ibid.
6. ibid.
7. 'para 2.2' supra '3'.

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