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Comments:

Draft Direction for delivering broadband services in a transparent manner by providing adequate information to broadband consumers

Sistema Shyam TeleServices Limited (SSTL) welcomes the opportunity extended by TRAI to comment on its draft direction for delivering broadband services in a transparent manner by providing adequate information to broadband consumers.

SSTL believes that transparency is non-negotiable in safeguarding the interest of the customers. Further, transparency is an essential means by which customers can navigate the market to obtain the services which best meet their requirements. However, there are considerable challenges in providing transparency to customers in case of mobile data networks because it is impossible to guarantee or even predict a particular level of network performance which depends on variables such as the location of the user and the device they are using, the behavior of other users on the cell, or the local climate etc.

Please find below our comments on the provisions of draft direction:

Telecom service providers providing broadband (wire-line or wireless) services to-

(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: -

(A) for Fixed broadband service:

- (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;**

SSTL is in agreement with the above provisions of the draft direction.

(B) for Mobile broadband service:

- (i) data usage limit with specified technology (3G/4G) for providing services;**
- (ii) technology (3G/4G) offered for providing broadband services upto specified data usage limit; and**
- (iii) technology (2G/3G/4G) offered for providing broadband services beyond data usage limit;**



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In case of CDMA, data services are offered through technologies like EVDO (Rev B/Rev A) and CDMA 1X which are backward compatible. For ensuring seamless data connectivity even though the subscriber has opted for EVDO Rev B / Rev A technologies the provision to ensure that backward compatibility of EVDO Rev B / Rev A to CDMA 1X as per available network at that particular location should be allowed.

Further, it is also submitted that beyond the data usage limit, instead of technology the throttled speed as already being provided to the customers should continue to be provided to the customer as the committed data under the specified technology has already been consumed by the customer therefore specifying technology beyond data usage may not be of any relevance.

- (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;**

SSTL believes that the objective of aforementioned provision is to transparently inform the customer about the broadband tariff plans offered under fair usage policy i.e. Unlimited data tariff plan. The same is already being informed to the customers at the time of recharge/enrolling into a tariff plan and through the website. In view of foregoing, there should be a flexibility to the operator to have an option of either providing the information specified in para (a) above on the registered email address or through SMS on the registered mobile number of the new subscribers.

- (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;**

There are two types of data tariff plans:

- i. Limited Data Tariff plans
- ii. Unlimited Data Tariff plans (with fair usage policy)

Limited Data Tariff Plans: The broadband speed in case of limited data tariff plans is provided to the customer till the consumption of the committed data under that tariff plan.

Unlimited Data Tariff plans (with fair usage policy): In case of broadband unlimited data tariff plans the subscriber should be provided the broadband speed till the consumption of specified data thereafter the throttling of speed



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should be allowed in order to avoid any exploitation/misuse by the subscriber.

- (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; and**

One time alert through SMS is currently being provided to the customers whenever data usage reaches 80% and 100 % of the data usage limit under the subscribed tariff plan. Further, it is submitted that in today's scenario, most of the fixed broadband connections use Wi-Fi modem in order to enable concurrent login sessions by multiple users using multiple devices. SSTL believes that providing alert to the fixed broadband subscriber at each login after his/her data usage reaches 80% of the data usage limit under the subscribed tariff plan in the aforesaid scenario will cause inconvenience to the customer therefore the provision of providing alert to the fixed broadband subscriber at each login after his/her data usage reaches 80% should be done away with.

- (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,-**

We are in agreement with the above clause in case of fixed broadband subscribers. However, in case of mobile broadband subscribers, there are technical constraints for providing alert in terms of percentage when the data usage by the subscriber reaches eighty percent and hundred percent of the data usage limit under his plan in case of prepaid mobile broadband connection. However, alert on the basis of absolute data left can be provided to the prepaid mobile broadband subscribers.

Further, it is pertinent to mention that implementation of provisions of the draft direction would require developmental changes in the system therefore, it is requested that the Authority may kindly provide three months time period for implementation of the direction from the date of issue.

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