



10th Aug 2017

Advisor

(Broadband & Policy Analysis)

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
(Old Minto Road)
New Delhi – 110002

Subject: Consultation Paper on "Data Speed Under Wireless Broadband Plans"

Dear Sir,

This is in reference to your Consultation Paper number 06/2017 dated 1st June 2017 on "Data Speed Under Wireless Broadband Plans".

As desired, we hereby enclose our response to the questions raised in your above mentioned Consultation Paper. We hope our response will be given due consideration. We shall be obliged to address any further queries from your good office in this regard.

Thanking you and assuring you of our best attention always.

Yours sincerely,

Satya Yadav
Addl. Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
For Tata Teleservices (Maharashtra) Limited

Encl: As above

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**TTL response to Consultation Paper on
“Data Speed Under Wireless Broadband Plan”**

Q1: Is the information on wireless broadband speeds currently being made available to consumers is transparent enough for making informed choices?

TTL Response:

As per TRAI directions dated 31st October 2016, on delivering broadband speeds in a transparent manner and provide adequate information to broadband consumers, TSPs offering wireless broadband are mandated to disclose the Data Usage Limit with specified 3G/ 4G technology respectively and also the speed offered after this limit is exhausted. This disclosure needs to be made by the TSPs on their web-site and all advertisements.

Currently information is being made available to customers in the form of the Data Plans which are volume based specific to the technology (CDMA/2G/3G) because download speed in wireless broadband networks depends on various factors and would vary based on network conditions. Hence TTL believes that the current information being made available to the consumer is transparent and enough for making informed choices.

Q2: If it is difficult to commit a minimum download speed, then could average speed be specified by the service providers? What should be the parameters for calculating average speed?

TTL Response:

Wireless Broadband Speed depends on many critical factors such as availability of web server, website traffic, Number of concurrent active subscribers attached to a cell site, type of application being accessed, subscriber's distance from the BTS, Location of usage (Indoor/Outdoor), Peak/ Off peak time specific events, Device classes, speed of mobile etc. CDMA/2G/3G technologies do not support committed data rate, therefore a challenge in specifying minimum download speed. In addition to above factors, average speed also depends on measured number of samples/time duration. This can affect consistency of the results and may not reflect the true user experience. However, service providers can specify the typical speeds as per respective technology. Committing a minimum download speed and average speed is not feasible technically.

Q3: What changes can be brought about to the existing framework on wireless broadband tariff plans to encourage better transparency and comparison between plans offered by different service providers?



TTL Response:

TTL is of the opinion that there is sufficient competition in the market. Service Providers under the given competitive pressure are coming up with attractive Tariff Plans that are transparent. Since these tariff plans are available in public domain in format prescribed by TRAI, these can be easily compared by the customers. Hence, we believe that existing framework in wireless broadband plan is sufficient and there is no requirement of changing the existing framework.

Q4: Is there a need to include/delete any of the QoS parameters and/or revise any of the benchmarks currently stipulated in the Regulations?

TTL Response:

The QOS parameters and the benchmarks as mentioned in The Standard of Quality of service for Wireless Data Services (Amendment) Regulations, 2014 (10 of 2014) are appropriate & adequate to measure the QOS in terms of Upload/Download Success Rate, Average Download/Minimum Download Speed and Latency.

However, benchmark specification of Average Download Speed and Minimum Download speed is an area of concern due to the reasons mentioned above and hence the benchmarks as specified in the regulation may be considered for deletion.

Q5: Should disclosure of average network performance over a period of time or at peak times including through broadband facts/labels be made mandatory?

TTL Response:

Data usage pattern suggests that there is no single peak hour for all the cell sites. Customer data usage behaviour varies from area to area and also with respect to time, hence averaging in such scenario may not reflect true Network performance. Hence TTL is of the opinion that introduction of broadband facts/ labels, disclosing average network performance over a period of time or at peak times should not be made mandatory. Variance in disclosed information in the data labels with actual customer experience may lead to customer disputes and litigations.

Q6: Should standard application/ websites be identified for mandating comparable disclosures about network speeds?

TTL Response:

There is no common standard at present to measure speed by different websites. Different applications use different proprietary methods for measurement of speed. There are many such websites and applications available in the market. Identification of standard application or website



for mandating comparable disclosures about network speeds may result in declaration of winners and losers and also may lead towards restriction of innovation in the eco system.

TTL is of the opinion that "TRAI MY SPEED" App is available for the customers to measure their data speed and network performance. The authority may promote the app to increase customer awareness and use of this app for evaluation of data speed and submission of the results with the authority. The comparable results of the tests done by the customers may be published by the authority in public domain.

Q7: What are the products/technologies that can be used to measure actual end-user experience on mobile broadband networks? At what level should the measurements take place (e.g., on the device, network node)?

TTL Response:

Currently methods and tools exist to measure end-user experience and also identify the source of degraded Internet Speeds. However studies have proven that certain privacy and security threats may arise on account of user and device data as these tools may access the location and sensitive data of the user, which may lead to user's privacy and security breach.

Hence in view of the above TTL do not recommends using such tools to measure actual end-user experience which may have adverse impact on the privacy and security of the user.

Q8: Are there any legal, security, privacy or data sensitivity issues with collecting device level data?

a) If so, how can these issues be addressed?

b) Do these issues create a challenge for the adoption of any measurement tools?

TTL Response:

As mentioned in our response if Q7, there are tools/ applications may collect the sensitive data of users thereby risking the privacy and security of users' data. Hence use of such tools is not suggested. TTL is of the opinion that the issue of security & privacy of consumers can be addressed by bringing appropriate amendments in the IT Act. Also this is a larger issue which can be taken up separately covering all applications and OTT players.

Q9: What measures can be taken to increase awareness among consumers about wireless broadband speeds, availability of various technological tools to monitor them and any potential concerns that may arise in the process?

TTL Response:

The TSPs can define typical speeds of various offered technologies on their website along with the details of methodology used. As mentioned in our response to Q6 in the



consultation paper, "TRAI My Speed" may be promoted by the authority to increase awareness and use of the app among wireless broadband customers.

Q10: Any other issue related to the matter of Consultation.

TTL Response:

NA