



VIL/PB/RCA/2023/037  
December 28, 2023

**Advisor (QoS-I)**  
**Telecom Regulatory Authority of India,**  
Mahanagar Doorsanchar Bhawan,  
Jawaharlal Nehru Marg (Old Minto Road),  
New Delhi – 110002

**Kind Attn: Shri Tejpal Singh**

**Subject:** Counter-comments on the TRAI's Consultation Paper on "Review of Quality-of-Service Standards for Access Services (Wireless and Wireline) and Broadband Services (Wireless and Wireline)" issued on August 18, 2023

**Dear Sir,**

This is in reference to the TRAI's Consultation Paper on "Review of Quality-of-Service Standards for Access Services (Wireless and Wireline) and Broadband Services (Wireless and Wireline)" issued on August 18, 2023.

In furtherance to the detailed comments submitted by us vide our letter no. VIL/PB/RCA/2023/035 dated December 14, 2023, kindly find enclosed herewith counter-comments from Vodafone Idea Limited on the above-said consultation paper.

We hope our submission will merit your kind consideration please.

Thanking you,  
Yours sincerely,

**For Vodafone Idea Limited**

**P. Balaji**  
**Chief Regulatory & Corporate Affairs Officer**

**Enclosed:** As stated above



**VIL Counter comments to the TRAI's Consultation Paper on  
"Review of Quality-of-Service Standards for Access Services (Wireless and Wireline)  
and Broadband Services (Wireless and Wireline)" dated 18.08.2023**

At the outset, we are thankful to the Authority for giving us the opportunity to provide our comments and counter-comments to the Consultation Paper on "Review of Quality-of-Service Standards for Access Services (Wireless and Wireline) and Broadband Services (Wireless and Wireline)" dated 18.08.2023.

Vodafone Idea Limited (VIL) has submitted comments to the draft Regulation and questions raised in the above-said consultation paper. Further, we have also gone through the comments of various stakeholders on the above-said consultation paper and would like to submit our counter-comments for Authority's kind consideration, as given below:

**1. Licensees have favoured light touch regulation on QoS**

a. One of the stakeholder has commented that:

*"In the short term, the Authority may consider moving towards a light touch regulatory framework for QoS, i.e., only limited parameters to be measured and reported quarterly. In the long-term, the Authority should deregulate the QoS parameters while maintaining the oversight through drive tests and/or (a mix of) drive tests and third-party surveys by independent agency."*

b. Another stakeholder has mentioned that:

*"We submit that it is impossible to find a parallel to granularity and frequency of reporting and compliance mechanism for QoS prevalent in India in any global jurisdiction. Most global experiences, especially in developed countries with 4G and 5G presence indicate that QoS and QoE is collected and monitored through consumer devices in a crowd sourcing manner, without any reporting requirements. Further, the QoS parameters are also limited to customers service experience and do not get into redundant aspects like time taken to answer by a person at customer care, as long as the IVR or app are able to meet the requirements, there is no need for a human presence. We submit that these international experiences should also form our approach towards QoS monitoring. The Authority already has a MySpeed app, which can be further improved to include other QoE related aspects, and all these parameters can be removed from QoS monitoring and reporting requirements."*

c. Another stakeholder, which is working in mobile and mobile and fixed broadband network intelligence, testing applications, and related technologies, has stated that:

*"...exclusive provider of global network performance data to GSMA Intelligence (GSMAi), a trade body that represents the interests of mobile operators worldwide, uniting more than 750 operators with almost 400 companies in the broader mobile ecosystem."*

*"As a widely adopted consumer internet intelligence standard, ... fixed and mobile data is used by the U.S. Federal Communications Commission (FCC) for internal analysis, reports to Congress and public documents on the status of the telecommunications marketplace."*



*"...controlled Rootmetrics drive and walk testing offers additional views into QoS, complements the company's crowdsourced measurements, and enables root cause analysis that helps providers or regulatory authorities not only identify when network issues occur but, critically, why issues are taking place and how to best resolve them."*

*"Too many coverage maps are based on marketed coverage or estimated coverage rather than verified coverage. For reference, Arcep, the French regulator, also publishes maps of measured QoS and QoE from drive tests and crowdsource metrics. This gives greater insight than just coverage."*

*"1.1 How Regulators Use ... Data*

- Map nationwide broadband service availability and mobile coverage to analyse geographic trends and see how people are or are not connecting with networks*
- Access network coverage and consumer-initiated performance data that can be compared against telecommunications service providers' declared coverage maps to validate network claims*
- Understand the quality, performance and location of existing networks, how operators are meeting the service obligations of their current agreements and where infrastructure investments are needed*
- View how mobile networks perform by operator, spectrum band and device*
- Access historical network performance and coverage data to understand trends and progress over time*
- Inform policy and spectrum allocation decisions*
- Track the rollout and adoption of new spectrum*
- Analyze networks in high-traffic areas, popular venues and public spaces to ensure public safety*
- Measure a country's network development over time, benchmarked against other countries, regions and the world"*

- d. **We support the above comments made by other stakeholders and reiterate our comments made that TRAI should adopt light-touch approach for QoS norms which is based on publication of information crowd sourced by TRAI through its digital solutions. This will also be in line with global best practices.**
  - e. **Initially, the regulatory framework should move towards a lighter regulatory framework with few/limited parameters and reporting requirements and in longer term, it should do away with QoS benchmarks and reporting requirements.**
2. **All licensees have mentioned the draft Regulation to be stringent**
- a. We have mentioned in our comments that the proposed draft regulation prescribes way too stringent QoS norms. The new framework includes new parameters, change in benchmarks, reduction in assessment period from quarterly to monthly, increase in compliance geographies from only LSA level to LSA as well as State/UT level and huge increase in reporting requirements as well as financial disincentives.
  - b. Many stakeholders have submitted similar comments and highlighted that the proposed draft Regulation prescribes way too stringent QoS norms.
  - c. One of the stakeholders has mentioned that:

*"This shift in reporting frequency raises concerns about its compatibility with the principles of the Ease of Doing Business (EODB), a key focus of the Government. A switch from quarterly reporting to monthly will significantly increase the reporting and cost burden for TSPs. The substantial surge in compliance instances seems contradictory to the government's goal of simplifying processes and reducing bureaucratic obstacles."*

*"The vast network in India is created based on the LSA-based licensing framework. TRAI's regulations therefore must also be consistent with this licensing regime."*

- *The Indian telecom market is divided into 22 licensed service areas (LSAs). These LSAs are categorised into Metro, A, B, and C categories which have been decided based upon the socio-economic conditions of these LSAs; and the entire network architecture of the industry, planned and built over the years, is based on this.*
- *If the QoS starts being measured differently at state, city and district levels, it will be in contradiction to the present licensing regime, and lead to complexity and confusion.*
- *It is also Airtel's contention that TRAI's approach in this draft regulation<sup>3</sup> will be further in contradiction to past and present Rollout guidelines including as specified in the Notice Inviting Applications (NIAs), wherein the (minimum) rollout criteria have been given by the licensor.*
- *Airtel highlights here that the licensor in its wisdom chose "minimum" rollout conditions rather than "maximum" rollout conditions, since these would apply to commercial aspects of the TSP.*

*Any regulatory intervention inconsistent with India's licensing regime will risk causing complexities and implementation challenges."*

d. Another stakeholder has commented that:

*"The draft Regulations go against the Authority's cherished principle of Ease of Doing Business (EODB) by introducing over-regulation and unnecessarily stringent benchmarks and Financial Disincentives (FD) thereby resulting in increased cost of services."*

*"There is no need for a massive overhaul of QoS Regulations and proposed draft regulation should not be implemented."*

*"Authority should collect reports as per settled licensing structure i.e. LSA wise from the TSPs and may consider employing artificial intelligence (AI) based tools at its end to convert the reports to more granular levels, if desired, instead of burdening the TSPs with multiplicity of reporting."*

*"Stringent benchmarks with FD implications can have the counterproductive effect on TSPs opting to not rolling out in areas where QoS cannot be met immediately and on continuous basis. This will be the biggest dampener on the national proliferation missions."*

*"The provisions for Financial Disincentives should be removed and at most a symbolic FD of Rs. 5000 per TSP per month should be kept."*

- e. **Considering, a unanimous view from all major licensees, we most humbly request TRAI to not prescribe the draft regulation, as the same is way too stringent and will certainly show TSPs' networks as non-compliant, with exposure to huge financial disincentives.**

3. **Stakeholders have asked for RIA**

- a. One of the stakeholder has commented that:

*"We submit that the technology evolution should have nothing to do with QoS reporting, especially with reducing technology life cycles. Further, the complaints pertaining to a new technology that is not even available across the country or operators at a large scale should not be the trigger for an overhaul of QoS Regulations. Furthermore, from our experience we understand that the most complaints are about when the customer will get 5G and nearly none about the QoE on 5G. Evidently, there are no valid ground for making such massive changes in a Regulation. Especially with far-reaching changes like inclusion of new parameters; reducing the timelines for reporting; and making the benchmarks stringent. Further, such an exercise with massive cost of compliance implications should be preceded by a regulatory impact analysis (RIA) and cost-benefit analysis."*

- b. Another stakeholder has submitted that:

*"...in order to draw up a regulation that is considered and apposite, it is very important to have a long and thorough deliberation on all constraints and dynamic conditions in which a telecom network operates, be it technical or non-technical — and what to do about them for maintaining and achieving the desired levels of QoS to best subserve the experience felt by subscribers. Additionally, the decisions on QoS should be supported by well-established Regulatory Impact Analysis (RIA) principles that align with the telecommunications landscape's intrinsic nature."*

- c. **In support of the above, we reiterate our submission that a systemic approach is required to assess the positive and negative effects of proposed regulations. QoS being such an important function of TSPs' network and services to the consumer as well as involving various external factors not in the control of TSPs, it would be fair that the Authority should carry out comprehensive Regulatory Impact Assessment and share the same through consultative process before finalizing such stringent parameters, assessment criteria and financial disincentives.**

4. **QoS norms should not be made more granular:**

- a. One of the stakeholders has mentioned that:

*"Increase in granularity of reporting for certain parameters should be reversed. We submit that quality of experience of a customer is not dependent on the granularity of reporting but on the depth and breadth of coverage available to him... this granularity has no impact on the customer service, as even when a cell is down, customer is served by another adjacent cell and his service remains unaffected and QoE remains same. Therefore, we submit that such parameters should have been removed from QoS reporting requirements, or at the very least, kept unchanged."*

- b. Another stakeholder has commented that:

*"Shorter duration of reporting that is excessively granular will only increase the compliance burden and may invite more short-term driven interventions.*

- *As of now, on an annual basis, there are approximately 5308 compliance events required to be measured and reported under the current regulations. However, if the proposed changes are implemented, this number would soar to about 38280 marking a substantial seven (7x) fold increase. The question arises whether merely ramping up reporting frequency and introducing more benchmarks can genuinely enhance Quality of Service (QoS) and improve*



*the lives of customers, without directly addressing the challenges faced by the telecom industry?*

- It may be noted that QoS is required to ascertain grade of service<sup>4</sup> but over a period of time. If the reporting period is kept too short, it may not meaningfully serve the purpose and, instead, could lead to authorities questioning the efforts of TSPs at short intervals.*
- Further, seeking the cell level parameters rather than the BTS levels will not only result in scrutinising at a significantly granular level, but will also fail to provide any useful insight below the BTS level. Rather, this approach of cell level granularity can make network QoS look worse, again leading to the heightened likelihood of unnecessary interventions.*
- This shift in reporting frequency raises concerns about its compatibility with the principles of the Ease of Doing Business (EODB), a key focus of the Government. A switch from quarterly reporting to monthly will significantly increase the reporting and cost burden for TSPs. The substantial surge in compliance instances seems contradictory to the government's goal of simplifying processes and reducing bureaucratic obstacles."*

- c. **We support the above submissions made by other stakeholders and would like to reiterate that severe granular changes are too stringent. We would like to again highlight that such granular changes will lead to TSP(s) being shown as having non-compliant networks whereas presently the networks are compliant.**
5. **No consumer feedback to the consultation paper:** We would like to highlight that no consumers have provided their comments to this consultation paper which demonstrates that there is no substantial degradation in QoS experienced by the consumer. **Therefore, there seems to be no reason to deliberate/prescribe such stringent regulation. We again reiterate that the consultation does not provide any information/analysis on consumer feedbacks over a period of last few years and is not in sync with market and technical realities.**
6. **No data by stakeholders seeking change in existing QoS norms:**
- a. One of the stakeholder has stated as follows:
- "Also, the QoS requirements are closely intertwined with the changes in consumer preferences and experience and the QoS of the Telcos must reflect these changes over time. translate into better Quality of Experience (QoE) for the consumers and overall consumer satisfaction. The time is ripe to review of Quality-of-Service Standards for Access Services (Wireless and Wireline) and Broadband Services (Wireless and Wireline). The time is ripe to review of Quality-of-Service Standards for Access Services (Wireless and Wireline) and Broadband Services (Wireless and Wireline)."*
- b. **We do not support this and would like to submit that any extensive review of a well settled regulatory regime should be backed by data points for any emergent change and not on mere assumptions. We do not see any data being provided in the comments submitted by such stakeholders seeking change in existing QoS norms.**

xx----- End of Document -----xx