We are a young start up that has been set up to harness the power of information (and internet) to improve the lives of more than half a billion Indians in a measurable and sustainable manner. We believe information asymmetries are compounded across different socio economic classes, and by offering equal access to information, we can be instrumental in reducing the income inequalities that are continuing to grow disproportionately in our society.

Our responses to some of the questions raised in the pre consultative paper on Net Neutrality issued by TRAI on 30th May 2016 are set out below:

What should be regarded as the core principles of net neutrality in the Indian context? What are the key issues that are required to be considered so that the principles of net neutrality are ensured

The characterization of internet as the information highway is, itself, a strong validation of the core principle of Net Neutrality. Similar to the way a highway is a means to reaching a destination, and offers similar access to all users irrespective of destination (provided the destination is enroute), the principles for access to internet should be non discriminatory. Just as toll roads can be created to smooth traffic etc, internet access data limits and speeds can be packaged differently by internet providers and offered at different prices. However, such pricing is transparent and available to all users, based on their willingness to pay. Once a user accesses internet, his/her user experience should not be influenced by the site he/ she accesses. In the court case decided in favour of the FCC in the US issued on June 14, the principle of net neutrality was reinforced through the statement "all bits are equal". The Supreme Court (USA) ruled that in today's world, broadband and internet access are an essential part of an individual's life and cannot be regarded as a luxury. Based on this principle, it is important that our views on access and pricing of internet start following our pricing norms for utilities, such as water and electricity. For instance, based on electricity consumption, a customer can be charged differential packages, but for instance, a customer cannot be given a discount or premium if he / she is using, say Philips lighting. This will amount to collusion or monopolistic practices and have an adverse impact on the free choice of a customer.

We would like to re-iterate that net neutrality is about ensuring similar access to all websites and information, and ensuring the same user experience agnostic of the website. However, this doesn't imply

that internet providers can start suggesting use of some sites, or advertising some sites, as this should follow our principles/ Code of Conduct for advertising and marketing of companies and brands. This is especially important in today's context where a fair share of service providers' revenues are coming through advertising etc. In some ways, this should be treated similar to advertising in newspapers – there needs to be clear distinction between advertised and original content, and there can be options available for customers to use "non-advertised information highway/ newspaper" and pay a higher price for this premium service.

What are reasonable traffic management practices that need to be followed by TSPs while providing internet access services and in what manner could these be misused. Are there other current or potential practices in India that may give rise to concerns about net neutrality?

Given the amount of data that is now flowing through the internet, it is important that telcos be given some flexibility and guidance on traffic management, so as to allow their users the best experience at given bandwidth or infrastructure levels. However, such traffic management practices need to embed the principles of net neutrality, and be based on the principle of an open network architecture. While the use of internet or World Wide Web has proliferated based on principles of net neutrality and equal access, any changes to this can have adverse consequences on how customers view and use internet. In the early years, our technology wasn't capable of interfering with users traffic on a wide scale. However, today, several options for prioritization, blocking, checking and redirection exist. These can allow optimization of traffic and use of bandwidth, but they can also affect consumer choice and trust. Using deep packet inspection, internet providers can look into data packets and see what users are sending and re-direct or prioritise some of this (to manage periods of congestion and down time etc). This is similar to a post office opening letters and deciding which should be prioritized. Such practices should not be allowed. Users can be given differential pricing for usage in times of heavy congestion or low usage, but such packages should be applicable irrespective of which site they use. Network operators often cite "quality of services" or "subscriber personalization" as the basis and rationale for some of this discriminatory traffic management practices. However, these should not be allowed as it will yield to monopolistic and anti-competitive practices. It is important that users access and experience to all website should be similar (from a network

providers' perspective). They may advertise or suggest some websites, but they should not be allowed to influence or affect consumer choice

What precautions must be undertaken with respect to activities of TSPs and content providers to maintain customer privacy? Please comment with justification

The network architecture of internet access allows TSPs and content providers access to significant amounts of personal data of users. Most of them have terms and conditions and privacy policies which are made aware to customers that deal with data privacy. However, it is important that there are some overall guidelines by the regulator on data privacy , that cannot be violated by TSPs or content providers. The basic tenet of data privacy is that information pertaining to an individual which allows him/her to be identified, should not be shared or sold by the service provider. Information in aggregate, or anonymous information regarding tastes, preferences or buyer behavior can be shared. Such data can be used by service providers/ marketing companies to offer targeted campaigns or deals to a set of individuals, only if the consumer has agreed to this. It is important that such data, if used, should be used/ managed by the service provider and not sold as data that can then be used by multiple providers. This will ensure some accountability norms and allow better control of the principles of data privacy by the regulator. This is in line with the privacy norms established by the EU and USA. A few self regulating certification programs have been developed by the industry on privacy, but they have not had much success, primarily because the overall policy was not very clear and they were working rather independently of the regulator. The TRAI may consider engaging with ISP networks etc to ensure smooth monitoring of data privacy laws.

At the same time, data has become the core tenet for many business models that have transformed lives of millions of people. For example, an email or a social platform uses individual level data to create aggregated intelligence and monetizes it. Result – high quality applications for end users paid by insights generated at aggregated levels. Similar models can create business models even at the network layer and help make an affordable, if not free, internet delivery model. If Gmail can be free, why can't internet be!