

**VTL Response to Consultation Paper  
on  
'Amendment to the Standards of Quality of Service for Wireless Data Services Regulations, 2012'**

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Videocon Telecommunications Limited welcomes the opportunity extended to comment on the Consultation Paper on '**Amendment to the Standards of Quality of Service for Wireless Data Services Regulations, 2012**'

At the outset Videocon Telecommunications Limited would like to submit that in today's competitive market Quality of Experience is a key driver for a Service Provider to ensure long term customers association.

Videocon Telecommunications Limited has always ensured that customers should be provided with best of the quality experience on its network. Thus the primary objective is to provide subscribers the 'Quality of Experience' rather than focusing only on 'Quality of Service'.

We are of the opinion that Quality of Service should be driven by the market forces and we should progressively move towards a regime of forbearance with regard to Quality of Services for Wireless.

Our response to the issues raised in Consultation Paper is as follows:

**Question 1: What are your views on prescribing benchmarks for minimum download speed as above? Please give your comments with justification.**

Ans: Data transmission rate or download speed is dependent on various dynamic factors such as:

- a. Number of subscribers browsing the data services,
- b. Coverage area,
- c. Subscriber location
- d. Peak / Off Peak time,
- e. Device Type,
- f. Link Availability between the Web Server and the Telecom Network
- g. Website behavior, etc

Further, in a multiple access scenario issues related to interference, fading etc and other variations in the radio conditions preclude any minimum download speed. In addition we would also like to submit that wireless subscriber accesses the internet in an environment which is highly dynamic in nature and outside the control of the Telecom Service Provider. Therefore, it is difficult for the TSPs to commit any download speed to the subscriber.



**Videocon Telecommunications Limited**

It is also pertinent to mention that, internationally no regulator has prescribed or set any such benchmark for minimum download speed for wireless data; therefore, we are of the opinion that there is no need to mandate QoS benchmarks for this parameter.

**Question 2: Should the service provider be mandated to inform the minimum download speed to customers along with each tariff plan? Please give your comments with justification.**

**Ans:** As submitted above it is technically not feasible to specify any minimum download speed for Wireless data services and therefore we are of the opinion that no mandate should be issued to inform the minimum download speed to customers along with each tariff plan.