

To
Shri A. Robert J. Ravi,
Advisor (CA & QoS)
Telecom Regulatory Authority of India,
New Delhi-110002

Subject: Response to TRAI Consultation Paper No. 03/2014 on "Amendment to the Standards of Quality of Service for Wireless Data Services Regulations, 2012"

Dear Sir,

With reference to the above consultation paper, I'd like to share my views with the Regulator which I hope will be considered in amending the standards of QoS for Wireless Data Services.

With reference to section 2.4 of the consultation paper, I propose the following amendments,

- CDMA 1X – Minimum download speed shall be enhanced to atleast 64 kbps
- GSM 2G – Minimum download speed shall be enhanced to atleast 64 kbps

For the rest of this discussion, speed is assumed as to be download speed.

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

In section 1.1 of the paper, test server is defined as a server setup by the Telecom Service Provider [TSP] usually on TSP network as mandated by TRAI Standards of Quality of Service for Wireless Data Services Regulations, 2012 (26 of 2012) on 4th December, 2012. Most TSPs provide about 70-80% of the advertised speed when measured against their Speedtest Server located on the same network. However, in reality, most **Indian consumers are accessing Websites located mostly in the United States / European data centers** and some Content Distribution Networks in Asia Pacific and Japan. In my own case, the data transfer speed for 3G service as advertised by my TSP is 3.6 mbps while the speed when measured against my own [speed test server](http://www.3g4g.in/speedtest) located in the United States [<http://www.3g4g.in/speedtest>] is mere 1.2 mbps. **I strongly recommend that the "Benchmarks" mentioned in the table of section 2.4 of the consultation paper be measured on servers located outside the TSP network.**

Since Wireless Data Services Speed is in the interest of large and exponentially growing section of consumers, TRAI must recommend the following

- Consider establishing a common speed test server on any of the NOCs operated / controlled by the NIXI
- The Speed test module shall cover at least 3 servers – one on NIXI, second one in the United States and the third one in either Europe or Asia Pacific. The **weighted speed** shall be determined as the **actual speed for the consumer**. The Weights shall obey the



following formula { US > Europe / Asia Pacific > NIXI } and the sum of all weights shall be equal to Unity. Let me illustrate the same with an example,

Measured Speed (a)	Weight (b)	Weighted Speed (a * b)
1000 kbps	0.45 – United States	450 kbps
1200 kbps	0.30 – Europe	360 kbps
2000 kbps	0.25 – NIXI India	500 kbps

Thus the **actual speed for the consumer** shall be $450 + 360 + 500 = 1,310$ kbps.

- Lead development a Mobile App for speed test and open source the same
- Consumer speed test by the Mobile App provided by TRAI / DoT/ Government **Or** Speed test on designated website such as NIXI / TRAI / DoT performed by the consumer using mobile browser **shall not be recorded as Data Usage** in any of the Plans / Packs provided to the consumer. Thus, even when the consumer has exhausted his data pack / plan, he shall be able to conduct speed test FREE of cost. Standards should evolve now, or they'll never.

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.

Without an element of doubt, the **consumer should be empowered by the TRAI to know the details of the plan which includes minimum speed**. As long as the TSP is charging for the consumer, let the TSP be under the obligation to serve the consumer as taught by the Father of our Nation, Shri Mahatma Gandhi Ji, as quoted under
"A customer is the most important visitor on our premises. He is not dependent on us. We are dependent on him. He is not an interruption in our work. He is the purpose of it. He is not an outsider in our business. He is part of it. We are not doing him a favor by serving him. He is doing us a favor by giving us an opportunity to do so"

As curtains go down on an era of Paralyzed & Scam Scarred Governance, let us look forward for better QoS and Advancement of the Telecommunications Sector in India.

Should you have any questions, please feel free to touch base with me and my services to the TRAI & Nation are always available.

Sincerely,

Chetan S Patil

