

1178/TRAI/ISP AI/16  
February 1, 2016

The Advisor (NSL)  
Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan,  
Old-Minto Road, Near Zakir Husain College,  
New Delhi – 110003

**Subject: ISP AI response to TRAI Draft Direction on Delivering Broadband service in transparent manner**

Dear Sir,

We congratulate the Authority to have come out with the Draft Direction on the matter captioned above and sincere thanks for providing us the opportunity to submit our views on this matter.

We would like to highlight few issues:

- 1. As mentioned in the point no. 4 – “Now, therefore, in supersession of its earlier direction No. 4-1/2011 BB&PA dated the 27th July, 2012, the Authority, in exercise of the powers conferred upon it under section 13, read with clause (b) of sub-section (1) of section 11, of the Telecom Regulatory Authority of India Act, 1997 (24 of 1997) and in order to ensure transparency in delivery of internet and broadband services and to protect interests of consumers of the telecom sector and to facilitate further growth of internet and broadband services in India, hereby directs all the telecom service providers providing broadband (wire-line or wireless) services to”**

**ISP AI Response:** We would like to submit that the Authority should clearly mention that all the telecom service providers providing Fixed & Mobile Broadband (wire-line or wireless) in the paragraph.

- 2. Point No. 4 (a) B - for Mobile broadband service: (i) data usage limit with specified technology (3G/4G) for providing services; (ii) technology (3G/4G) offered for providing broadband services upto specified data usage limit; and (iii) technology (2G/3G/4G) offered for providing broadband services beyond data usage limit;**

**ISP AI Response:** In respect of clause 4 (a) (B) “Mobile Broadband” is used without mentioning any speed as well as no minimum speed defined. So to be fully transparent, the minimum guaranteed speed in Mobile Broadband should be equal to Fixed Broadband i.e, 512 Kbps.

**If minimum** speed 512 Kbps in Mobile is not guaranteed than it should be called Mobile Internet. We also must consider that technology is not same on mobility all the time it changes as per the availability.

Further, for Mobile Internet or Broadband only Technology should be mentioned in marketing/advertisement. Speed should not be allowed to mention in marketing/advertisement.

**3. Point No. 4(c) – Ensure that download speed of broadband service provided to the fixed broadband subscriber is not reduced below 512 kbps in any broadband tariff plan;**

**ISPAI Response:** The paragraph should also contain the mobile broadband subscribers & can be rephrased as: *“Ensure that download speed of broadband service provided to the fixed & mobile broadband subscribers is not reduced below 512 kbps/ as per the directive in any broadband tariff plan;”*

We believe that the Authority would consider our response in positive perspective and incorporate our concerns on the subject matter.

Looking forward for your favourable consideration.

Thanking you,

With Best Regards,  
For Internet Service Providers Association of India



Rajesh Chharia  
President  
+91-9811 038 188  
rc@cjnet4u.com