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Subject: Comments on draft direction for transparency in broadband connections

To: kapilhanda@traf.gov.in

Dear Sir,

While the current draft is largely in the right direction, some points to consider about broadband and fair usage policy.

-Fair usage policies have been in effect for a number of years but while internet speeds have increased drastically, the data limits offered are still a paltry amount. Most operators (specifically for broadband connections) do not allow the user to have any say in the AMOUNT of data he/she can use at a given speed. It is always a fixed amount (usually 100gb/250gb a month) decided by the provider, which, particularly for users whose businesses depend on transferring large files on a daily basis, is a huge problem since bandwidth is reduced significantly and there is no way to increase it other than paying double for the month of waiting until the end of the month. Similarly, for a user who wants fast internet but does not use as much data - why should he be forced into paying for more data than he is using just because he wants faster speed. My suggestion is to have a provision that allows the user to choose plans based not just on speed of his choice but also based on the bandwidth cap of his requirement, specifically for broadband connections.

-The current draft (point 4-c) suggests the telecom operators reduce the speeds to a bare minimum of 512kbps. Honestly, in today's day and age given how data heavy most regular websites are, this should be raised to 1mbps. We need to raise this standard across the board. Most operators already offer 1mbps post the FUP cap, and reducing this would just encourage operators to reduce the bandwidth being provided and force users to buy more at inflated prices.

-Operators must clearly specify whether their bandwidth/FUP limits are download only, or also include upload data. Similarly, the upload speeds available in any plan must also be specified, and standardised to be the same as the download speed offered, throttled to a bare minimum of 1mbps post FUP cap. Eg: MTNL for several years had 2mbps plans which a user signed up for, but that was download only. Upload speed was a paltry 256kbps.

-Operators simply cannot be allowed to advertise a plan is "Unlimited" unless there is NO FUP LIMIT. Otherwise, it really isn't unlimited and they are just cheating the users.

I do hope you take these points into consideration.

Best regards,

A.