Consumer Broadband Labels
For Greater Transparency & Informed Consumers

Implemented by

Knowledge Partner

Supported by
Outline

- Broadband: Definition & Benefits
- Broadband Services in India: Key Challenges
- Existing Regulations
- Project Overview and Relevance
- International Experience
- Designing & Implementation Challenges
Broadband

“Broadband is a data connection that is able to support interactive services including Internet access and has the capability of the minimum download speed of 512 kbps to an individual subscriber from the point of presence (POP) of the service provider intending to provide Broadband service.”

(Telecom Regulatory Authority of India)

- Benefits of Broadband Services
  - Aids Economic and Social Growth
  - Better and Cheaper Communications/ Connected Citizens
  - Enhancing efficiency of conventional business models
  - Employment and Knowledge Sharing
  - ... endless
Broadband Services in India

- Complex form of dissemination of information by service providers to consumers
  - No standard format for information disclosure
  - Information is either too much or too less or too complex/technical for consumers to understand or comprehend

- Mismatch between QoS advertised and the Actual QoS experienced
  - Issues of mis-advertisement, mis-selling and false promises
  - Doesn’t justify the price paid by consumers for the service

- Use of terms such as “Unlimited” and “Upto”
  - Misleading terms, doesn’t disclose the actual terms of contract

- Absence of tool to compare broadband services
  - Uninformed choice making leading to consumer dissatisfaction
  - Limited QoS parameters in MySpeed and QoS Analytics App
Existing Regulations

Regulations (Broadband):

- Regulation On Quality of Service for Broadband Service, 2006
- Quality of Service of Broadband Service (Amendment) Regulations, 2012
- Quality of Service of Broadband Service (Second Amendment) Regulations, 2014

For Wireless Data Services

- The Standards Of Quality Of Service For Wireless Data Services Regulations, 2012
- The Standards Of Quality Of Service For Wireless Data Services (Amendment) Regulations, 2014
CUTS Intervention

- Create a network of stakeholders; increase their capacity/awareness on broadband services & related issues
- Ascertain the need for a Consumer Broadband Label for broadband services
- Advocate bringing necessary policy & practice changes
- Promote visibility of best practices within the sector
- Develop a roadmap for adoption of a Consumer Broadband Label

Envisaged Outcomes:

- Well informed, educated and responsible consumers
- Better understanding and clear analysis of existing QoS labels for broadband services across globe
- Regulator/Service Providers expressing interest in adoption of standard label for broadband services
- Adequate information and awareness about consumer rights and obligations while availing broadband services
Consumer Broadband Label: Need & Benefits:

- Means for service providers to disclose the actual Quality of Service (QoS) for their broadband services
- Sets a platform for comparison of QoS with the Standard/Regulatory benchmarks
- Tool for consumers to make an informed choice for broadband services
- Instills competition in the market and creates incentive for providing better QoS to consumers
International Experiences

United States
- Open Technology Initiative (OTI) of the New America Foundation in 2009 created 1st broadband label - Broadband Truth-in-Labelling disclosure.
- CI campaign "Holding Broadband Service Providers to Account" led to developing standard Broadband Disclosure Statement
- Federal Communications Commission based on Open Internet Study & Open Internet Order developed broadband labels – one for landline and one for mobile

United Kingdom
- Ofcom’s Voluntary Code of Practice in 2008 (for consumers) & 2016 (for businesses)

Singapore
- Telecom regulator of Singapore, Infocomm Development Authority (IDA), requires ISPs to report quarterly on some select parameters on QoS to IDA
Broadband Labels (Examples)

Broadband Disclosure Statement

**ExampleCom Ultra 25/10**
Electronic Generation: July 16, 2015
Compliant with FCC Broadband Disclosure Standards

<table>
<thead>
<tr>
<th>PRICING</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Monthly recurring fee</td>
<td>$40 per month during promotion</td>
</tr>
<tr>
<td>Plan Price</td>
<td>$50 per month after promotion</td>
</tr>
<tr>
<td>Taxes</td>
<td>$10</td>
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<table>
<thead>
<tr>
<th>One-time required fees</th>
<th>$70 Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Installation</td>
<td>$50</td>
</tr>
<tr>
<td>Activation</td>
<td>$20</td>
</tr>
<tr>
<td>Early termination fee</td>
<td>$150</td>
</tr>
<tr>
<td>Router purchase</td>
<td>$90</td>
</tr>
</tbody>
</table>

**PERFORMANCE**

- **Speed**: Average speed during peak hours
  - 15 Mbps download
  - 7 Mbps upload

- **Average speed over 24h period** (upload/download): 26/8 Mbps
- **Percentage of time at or above average speed**: 71%
- **Average latency**: 3 ms
- **Average latency, peak hours**: 5 ms
- **Average packet loss**: 0.4%
- **Average packet loss, peak hours**: 1%

**TERMS OF AGREEMENT**

- **Contract**: 2 years
- **Early termination fee** (Cancellation in first year): $150
- **Monthly recurring fee guaranteed for term of contract**: $20

**Privacy Practices**: FCC Rules on Broadband Privacy

**Network Management**: Company Network Management Practices

**Complaints Processing**: Company Complaint Form

**FCC Complaint Portal**: http://42knetwork.org/broadband
Broadband Labels (Examples)

**Fixed Broadband Consumer Disclosure**

Choose Your Service Data Plan for
- Monthly charge for month-to-month plan
- Monthly charge for 2 year contract plan
Click here for other pricing options including promotions and options bundled with other services, like cable television and wireless services.

Other Charges and Terms
- Data included with monthly charge
- Charges for additional data usage
- Optional modem or gateway lease – Customers may use their own modem or gateway; click here for our policy
- Other monthly fees
- One-time fees

Government Taxes and Other Government-Related Fees May Apply: Varies by location

Other services on network

**Performance - Individual experience may vary**
- Typical speed downstream
- Typical speed upstream
- Typical latency
- Typical packet loss

Network Management
- Application-specific network management practices?
- Subscriber-triggered network management practices?

More details on network management

Privacy
- See our privacy policy

Complaints or Inquiries
- To contact us: online/(123)456-7890;
- To submit complaints to the FCC: online/(888)225-5322

Learn more about the terms used on this form and other relevant information at the FCC’s website.

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**Mobile Broadband Consumer Disclosure**

Device Compatibility
- If you want to use your existing device, learn more about compatibility.
- If you want to obtain a device, learn more about prices and other options.

Choose Your Data Plan - These prices do not include costs for obtaining a device from us.

<table>
<thead>
<tr>
<th>High Speed Data allowance per month</th>
<th>GB</th>
<th>GB</th>
<th>GB</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monthly charge</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>When you exceed the data allowance</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Learn more about other included services/features.

Additional pricing options, plans and promotions can be found here.

Coverage Map

Charges and Terms Common to All Plans
- Monthly fees
- One-time fees

Government Taxes and Fees, and Other Carrier Surcharges May Also Apply: Varies by location

**Performance - Individual experience may vary**
- Typical speed
- Typical latency
- Typical Packet Loss

Network Management
- Application-specific network management practices?
- Subscriber-triggered network management practices?

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# Broadband Labels (Examples)

## Cox Communications

**Broadband facts cable consumer disclosure**

<table>
<thead>
<tr>
<th>Essential 15Mb Package</th>
<th>Month-to-Month Charge (for 12 months)</th>
<th>$44.99</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other Charges and Terms</td>
<td>Data monthly limit</td>
<td>350GB</td>
</tr>
<tr>
<td></td>
<td>Charges for additional data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Administrative fee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Other monthly fees</td>
<td></td>
</tr>
<tr>
<td><strong>One-time Fees</strong></td>
<td><strong>Activation fee</strong></td>
<td>$20.00-$50.00</td>
</tr>
<tr>
<td></td>
<td><strong>Deposit</strong></td>
<td>Based on Credit Score</td>
</tr>
<tr>
<td></td>
<td><strong>Installation fee</strong></td>
<td>$50.00</td>
</tr>
<tr>
<td></td>
<td><strong>Early termination fee</strong></td>
<td>$240.00 will waive if you move somewhere that doesn't have Cox cable</td>
</tr>
<tr>
<td><strong>Government Taxes and Government related or FCC fees</strong></td>
<td><strong>Regulatory</strong></td>
<td><strong>FCC</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Regional</strong></td>
<td>$3.00</td>
</tr>
<tr>
<td><strong>Performance - Experience may vary</strong></td>
<td><strong>Typical download speed</strong></td>
<td>15 Mbps</td>
</tr>
<tr>
<td></td>
<td><strong>Typical upload speed</strong></td>
<td>2 Mbps</td>
</tr>
</tbody>
</table>

## WOW Cable

**Broadband facts cable consumer disclosure**

<table>
<thead>
<tr>
<th>Entry Level Plan</th>
<th>Month-to-Month Charge</th>
<th>$39.99</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Monthly charge for 12 month contract plan</td>
<td>$24.99</td>
</tr>
<tr>
<td>Other Charges and Terms</td>
<td>Data monthly limit</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Charges for additional data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Equipment monthly lease charge</td>
<td>$10</td>
</tr>
<tr>
<td></td>
<td>Administrative fee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Other monthly fees</td>
<td></td>
</tr>
<tr>
<td><strong>One-time Fees</strong></td>
<td><strong>Activation fee</strong></td>
<td>$40</td>
</tr>
<tr>
<td></td>
<td><strong>Deposit</strong></td>
<td>$250 (Pending Credit Check)</td>
</tr>
<tr>
<td></td>
<td><strong>Installation fee</strong></td>
<td>$20</td>
</tr>
<tr>
<td></td>
<td><strong>Early Termination Fee</strong></td>
<td>No</td>
</tr>
<tr>
<td><strong>Government Taxes and Government related or FCC fees</strong></td>
<td><strong>Regulatory</strong></td>
<td><strong>FCC</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Regional</strong></td>
<td>$2</td>
</tr>
<tr>
<td><strong>Performance - Experience may vary</strong></td>
<td><strong>Typical download speed</strong></td>
<td>30 Mbps</td>
</tr>
<tr>
<td></td>
<td><strong>Typical upload speed</strong></td>
<td>5 Mbps</td>
</tr>
</tbody>
</table>

## Network and Account Management

- WiFi and router or gateway access?: Yes
- Manage account and usage online?: Yes

## Privacy


## Complaints or Customer Service

<table>
<thead>
<tr>
<th>Technical Support</th>
</tr>
</thead>
<tbody>
<tr>
<td>850-478-0200 24/7 tech support</td>
</tr>
</tbody>
</table>
Broadband Labels (Examples)

Model Proposed to FCC during the Discussion for a Broadband Label

Example 1

Simplified, clear label with most critical information

Example 2

“Star” or index of service as ranked by third party

Example 3

Detail that is still clear and focused; list of common applications and what can be delivered with this service
Challenges: Design & Implementation

- Label cannot cover all aspects of a service. May omit an attribute that is important to a particular consumer.
- A label has no value if it is misleading or fraudulent. Trust is a major component of a labelling program's credibility.
- Labels that provide highly technical, trivial or irrelevant data information will not help improve consumer’s knowledge.
- For a Successful labelling programme, an effective monitoring system is required.
- Need for regular maintenance and frequent updating of standards prescribed in labels to keep up with development needs.
- Consumer Awareness/Sensitisation: Behaviour
Issues for Discussion

• How can the concept of labelling for broadband services turn into a feasible idea?
• Considering the competition and consolidation scenario in telecom industry, would the labelling mandate create incentive for operators to improvise on QoS?
• What should be more appropriate for consumers:
  ◦ A Qualitative Label (Star ratings, rankings, etc.)
  ◦ A Quantitative Label (Numeric values on QoS Parameters)
• What steps could be taken to deal with consumer behavior?
Thank You!