

Roundtable Discussion
TRAI Consultation on
‘Data Speeds under
Wireless Broadband Services’

June 23, 2017, Jaipur



Summary Note

CUTS International organised a Roundtable discussion on the Consultation Paper issues for public comments by Telecom Regulatory Authority of India (TRAI) titled 'Data Speeds under Wireless Broadband Services'. The roundtable, organised on June 23, 2017 in Jaipur, was attended by a diverse set of stakeholders comprising telecom & internet service providers, representatives of TRAI Regional Office, start-ups, civil society representatives and academia.

The discussion began with a brief introduction of CUTS International¹ its initiative on adoption of Consumer Broadband Labels². Referring to a recent study³ conducted by CUTS and IIT-Delhi on Quality of Services (QoS) for mobile internet service in India, the issue of poor QoS and information asymmetry for wireless internet/broadband services was highlighted.

Limited or complex information provisioning by the operators leads to uninformed decisions by consumers causing poor Quality of Experience (QoE) and increase in quantum of complaints. Understanding this issue, the Telecom Regulatory Authority of India' (TRAI's) Consultation Paper on 'Data Speeds of Wireless Broadband Services' invokes stakeholder comments on the subject, to frame optimal regulations.

The consultation paper raised the following questions that were discussed:

1. Is the information on wireless broadband speeds currently being made available to consumers is transparent enough for making informed choices?

The participants were divided on their opinions. While some suggested that enough information is being facilitated by the operators, others suggested that information like average speed, latency, Jitters, chokes, bandwidth etc. are not provided, even on consumer demand. Those suggesting that there exists lack of complete information disclosure indicated that it impacts the decision making of consumers as they are not aware of the suitability of service to their need.

Telecom operators explained that the very nature of mobile wireless broadband makes it difficult to gauge the actual QoS owing to numerous external factors impacting the quality, which are beyond an operator's control. CUTS recommended that services should be more transparent, and QoS should be assessed at the node and not individually.

¹ CUTS International Website. Accessible at <<http://www.cuts-international.org/>>

² Project Website. Accessible at <<http://cuts-ccier.org/broadbandlabel/index.htm>>

³ CUTS International & IIT-Delhi Study on QoS for Mobile Services in India. Accessible at <<http://www.cuts-ccier.org/QOSII/>>

Besides, it was also highlighted that despite the quarterly reports on QoS being uploaded by TRAI on their website, consumers are still not aware of them and for those who are aware, the reports are too technical to comprehend. There were deliberations on the expediency of range-based or average-based speed disclosure by operators.

2. If it is difficult to commit a minimum download speed, then could average speed be specified by the service providers? What should be the parameters for calculating average speed?

CUTS suggested that since Telecom Service Providers (TSPs) submit the average information for every circle to TRAI on a monthly basis, it is practical to do so and also for smaller geographic area. The scale and parameters need to be discussed and standardised. Operators opined that due to huge movement across the cities and Base Transceiver Station (BTS) and also considering the peak hour congestion, such information provisioning is impractical. TRAI representatives agreed and suggested that it is difficult to provide an average speed that is why providing a range for minimum and maximum speed serves as a better option.

3. What changes can be brought about to the existing framework on wireless broadband tariff plans to encourage better transparency and comparison between plans offered by different service providers?

Consumer Broadband Labels was recommended as one such mechanism. CUTS informed the participants, some existing labels for broadband service, which are already in use in other countries. It was also highlighted that the majority of consumers tend to reach out to the retailers for advices on broadband service preferences. CUTS mentioned that if a standard label is provided, the consumer will not have to necessarily depend upon and influenced by any retailer, and will enable them to make an informed choice. Besides, it was also proposed that the contours and contents of the label might be debated but a standard format of information disclosure is a must.

4. Is there a need to include/delete any of the QoS parameters and/or revise any of the benchmarks currently stipulated in the Regulations?

For this specific question, the participants were unanimous on the thought that there is no requirement for any changes right now. However, since the technology is changing very quickly, the framework needs to be assessed periodically.

5. Should disclosure of average network performance over a period of time or at peak times including through broadband facts/labels be made mandatory?

TRAI representatives explained that the Federal Communications Commission (FCC), USA urges the operators to publish the label, but it is not mandatory. For India, a voluntary exercise was suggested in the initial stage. In addition, it was advocated that

the regulators or operators could launch a pilot project to assess the benefits of broadband labels.

6. Should standard application/websites be identified for mandating comparable disclosures about network speeds?

One important point that surfaced was that a substantial proportion of the population in India was unawareness of TRAI as a regulator. Thus TRAI needs to expand its regional presence to boost its visibility. It was proposed that the disclosures can be put up on the TSPs websites/applications, TRAI website and apps and as physical copies at retailers' outlets.

7. What are the products/technologies that can be used to measure actual end-user experience on mobile broadband networks? At what level should the measurements take place (e.g., on the device, network node)?

CUTS cited an example of 'White Box' solution offered by SamKnows, which is currently being used in various countries to measure the QoS for broadband services. Besides, crowd sourcing applications, such as TRAI's MySpeed app are providing speed related information to consumers. TRAI representatives also informed the participants on the measures taken by TRAI to ensure quality of broadband services. The services included periodic audits and drive tests, which are both operator assisted and independent. Reports for the same are available on the TRAI website.

8. Are there any legal, security, privacy or data sensitivity issues with collecting device level data? If so, how can these issues be addressed? Do these issues create a challenge for the adoption of any measurement tools?

TRAI clarified that the data which is collected with by the MySpeed and DND Applications, is only after the consent of the consumer. No access to such data is provided to any user unless there are concerns of national importance or security and even in such cases, proper legal processes are followed. However, the group did accept that there exist concerns regarding privacy and security while data collection from consumer devices.

9. What measures can be taken to increase awareness among consumers about wireless broadband speeds, availability of various technological tools to monitor them and any potential concerns that may arise in the process?

TRAI representatives claimed that there is lack of participation from the consumers on surveys launched for their interest. Similar experiences were shared by CUTS representative that there is a widespread apathy among the consumers, which makes it difficult to collect data. CUTS suggested conducting capacity building programmes by Consumer Action Groups (registered with TRAI), Internet Service Providers, TSPs, TRAI, Department of Telecommunications (DoT) and Academia. Marketing campaigns similar to Jaago Grahak Jaago and promotions were also recommended to

make consumers more open to resolution of related issues. Academia representatives recommended that the data collected by crowd sourcing and public platforms, should be opened for academia and research organisations to work upon. This data, if analysed properly can help in innovation and research outputs, which can be beneficial to all stakeholders.

The discussion on the subject ended by highlighting that CUTS maintains inclusivity in all its researches. All stakeholder groups are represented, including the private sector. This helps in keeping the research outputs and recommendations neutral and unbiased. TRAI Regional Office, Jaipur, and CUTS urged the participants to submit their comments on the Consultation Paper before due date. This would help the regulator in drafting policies, which would cater to the interests of all the stakeholders.

The following participants contributed in the event to make it a success:

1. Ankit Pingle	CUTS International
2. Arvind Raina	Vodafone, India
3. Ashish Bhatia	MTS, India
4. Deepak Saxena	CUTS International
5. Dharmendra Chaturvedi	CUTS International
6. Jitendra Singh	Idea Cellular
7. Manish Lodha	TRAI Regional Office, Jaipur
8. Manish Saxena	TRAI Regional Office, Jaipur
9. Neelam Chaplot	Jaipur Engineering College and Research Centre (JECRC)
10. Pratyush Sharma	Idea Cellular
11. Rakesh Patel	MTS, India
12. Ram Niwas Choudhary	Vodafone India
13. Rahul Singh	CUTS International
14. Rohit Singh	CUTS International
15. Satish Sharma	Data Infosys
16. Somesh Buliwal	Data Infosys