

Dear Sir,

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> The Telecom Regulatory Authority of India (TRAI) this week released draft regulations with a view to benchmark and monitor quality of mobile data services offered by 3G and broadband wireless access (BWA) service providers.

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> **In my humble opinion, the proposed benchmarks look good from a 3G standpoint but there is enough room to raise the bars for BWA, a segment where LTE has emerged as the dominant technology.**

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> Consider, for instance, the benchmarks for latency. The TRAI draft paper has proposed it to be under 150ms for audio, 100ms for video, and less than 75ms for interactive data. While that's a reasonably good measure for 3G quality of service (QoS), it needs to be vastly superior for LTE. While opinions would vary on what latency benchmarks for LTE could be adopted, 20ms latency would largely be acceptable for a wide range of content.

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> While TRAI may deem it necessary to do a more thorough evaluation before arriving at a latency benchmark for LTE, the point is that a discrete benchmark for LTE is very much needed. Else, there could remain a wide gap in the regulations, and that could work significantly to the consumers' disadvantage.

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> Also, while the draft makes a very good point of proposing that average throughput for packet data would be more than 90 percent of the "subscribed speed," it also recognizes in another section that the throughput available to a customer will depend on "the number of users served" by a cell site.

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> These two statements may be mutually contradictory, depending on how the "subscribed speed" is defined. Does 'subscribed speed' carry a fixed value or is it changeable based on the number of subscribers in a given cell area? If it varies due to the distance between the cell site and the user, what are the acceptable parameters for such variations? It would be good to clarify these and such other points at a draft iteration itself.

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> With best regards

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