



03rd Sep 2012

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Sub: Idea Cellular's response to the TRAI Draft Regulations on "Standards of Quality of Service for Mobile Data Services Regulations, 2012"

Sir,

This is with reference to the Authority's invitation for comments on the above-mentioned Draft Regulation. In this regard, you may note that Idea Cellular endorses the views expressed by COAI on this issue. In addition, we have the following comments:

At the outset, we strongly feel that the Authority should allow the mobile data services to move through their normal evolutionary cycle without any restrictions on QoS and allow the free-play of market forces to decide the appropriate quality for the service. We believe that such flexibility, if allowed to continue at this stage, will also be consistent with the TRAI's policy of "Light Touch Regulation" that has enabled transform our country into the fastest growing telecom market across the World with one of the best QoS and lowest tariffs.

Having said that, we have the following additional submissions in support of our belief:

- We believe that provisioning and usage of data services through the mobile is still in the developmental phase in our Country, more so in respect of 3G technology.
- Further, there are uncertainties about the pace and scale of customer adoption in 3G, exacerbated by the fact that operators have sunk in massive costs to rollout 3G services.
- It is also already well known that most Indian operators are facing a serious spectrum constraint that is increasingly exerting pressure on their already-stretched network resources.
- Enablement from the Government is likely to hold the key to creation of conditions favorable to the usage of mobile data services. Towards that end, if mobile data services are to realize the potential of massively extending internet access in a fast, convenient and affordable manner to those who today lack it (*i.e., the "masses"*), then the operators need to be allowed more time towards understanding the market and building the value proposition and business case without any restrictions on QoS.
- In the absence of an enabling environment, it is expected that the data services may simply amount to adding another convenient channel for the "already internet savvy" part of our population. The consequence therefore will be a market trajectory with much lower ultimate levels of usage and access.



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- It is also submitted that there is already enough competition in the market along with the facility for number porting and hence the customer is likely to get only the “best quality” data services at every stage of the market development.
- In consideration of the above therefore, it would be appropriate that the Authority allow the mobile data services to move through their normal evolutionary cycle without any restrictions on QoS and allow the free-play of market forces to decide the appropriate quality for the service.
- Further, it is already acknowledged that the policy of “Light Touch Regulation” followed by the Authority has enabled transform our country into the fastest growing telecom market across the World with one of the best QoS and lowest tariffs.
- Our comments on the various parameters defined in the Consultation Paper are as follows:
 - **On “Service activation”:**
Service activation is an extremely critical step for a mobile operator as it is only after its execution that a subscriber can start using the service and generate revenue for the operator. It is natural therefore for an operator to endeavor to keep the time required for service activation at the minimum level possible. Nevertheless, we recommend that in the “Draft Regulation”, the benchmark be restricted to a realistic 24 hours for all activations through the call centre, web, SMS, IVR, the duration being counted from the time the request gets logged in the operator’s CRM. The Authority may kindly note that the “Quality of Services of Broadband Regulations, 2000” provides for a Service Activation Time of 15 working days for Broadband services through wireline.
 - **On “Successful Data Transmission Upload and Download Attempts”:**
We strongly recommend that these parameters be only used for monitoring purposes and not made mandatory. The measurement methodology proposed by the TRAI using a test server and a test file is acceptable; however, it is suggested that a centralized server (preferably, FTP server based testing) per LSA be allowed. Further, the measurements should be restricted to standard file sizes of 5 MB/ 500 KB for testing download & upload in the case of 3G, and 200 KB/ 60 KB for testing download and upload in the case of 2G. In addition, for the purposes of defining a “successful upload / download”, the time limit should be changed from the proposed 60 seconds to 120 seconds for the afore-mentioned file sizes and the number of attempts restricted to 50 per quarter.
 - **On “Minimum Download Speed”:**
We further feel that there is no place for the concept of “minimum download speed” which has its dependency on too many factors such as number of simultaneous users, coverage, customer location, time of usage, device being used, availability of web server, etc. We are therefore not in favour of it being included in the QoS Regulation as its measurement, based on the test environment, and the customer experience in an uncontrolled environment, are likely to be at variance with each other. It is therefore recommended that this parameter be kept out of the purview of QoS Regulation.

- On "Average Throughput for Packet Data" and "Percentage of Node B / BTS carrying < 80% avg. throughput in a LSA":

We strongly feel that the TRAI consider keeping this out of the list of QoS parameters, as the subscribed speed is a theoretical maximum speed under test conditions and should not be used for measuring average throughput. Further, the TRAI may, if it wishes, direct the operators to advertise the peak speed for customer information with a clear disclaimer that the actual speed experienced by the customer may vary because of various factors including the device type. The parameter on "Percentage of Node B / BTS carrying less than 80% of the average throughput in a license service area" may also similarly be kept out of the scope of QoS Regulation.

- On "Latency":

It may be noted that the latency for real-time services like audio and video cannot be measured. The measurement method stated in the TRAI's measurement methodology document can only be used for test files and not for real time services.

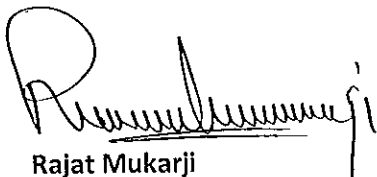
Finally, we would also like to submit that the draft Regulation considers the mobile data QoS for an entire LSA whereas data rollouts are still limited to a few cities where demand potential is higher. **Hence, to apply the Regulation on the full LSA would be unjust and will in effect tantamount to forcing operators to roll out in areas where there may not be business viability which is also unfair.**

We earnestly believe that the Authority will give due-consideration to our afore-mentioned comments before formalizing any guidelines on the issue.

Thanking You

Yours faithfully,

For IDEA Cellular Limited.



Rajat Mukarji
Chief Corporate Affairs Officer