



a step ahead

SSTL/TRAI/08-2012/
9th August 2012

The Advisor (CI & QoS)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg
New Delhi – 110 092

**Subject :- Comments on Draft Regulation On The Standards of Quality of Service
Mobile Data Services**

Dear Sir,

We are pleased to enclose SSTL's comments on Draft Regulation on "The Standards of Quality of Services for Mobile Data Services Regulations, 2012".

We request the Authority to consider our inputs while framing final regulation in this regard.

Thanking you

Your faithfully
For **Sistema Shyam TeleServices Limited**


Sunil Batra
Dy. Director – Corporate Regulatory

Encl : As above

Sistema Shyam TeleServices Limited
A Sistema Shyam Company

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S No	Name of Parameter	Benchmark	Remarks
3.1	Service Activation/Provisioning	Within 3 hours with 95% Success rate	The benchmark for data service provisioning should be increased to 4 hours with 90% to 95% success rate
3.2	Successful data transmission download attempts	>90%	It is Possible to show with field testing; However system reports would not be available
3.3	Successful data transmission upload attempts	>85%	It is Possible to show with field testing; However system reports would not be available
3.4	Minimum download speed	To be measured by service providers and reported to TRAI	As we understand from the TRAI Consultation Paper, it has to be reported on basis of downloading a test file from a test server. This can be done on need basis, however not on regular basis.
3.5	Average throughput for packet data	>90% of the subscribed speed	MTS offers wireless data services. In a typical wireless environment, there are no specific subscribed speeds. Speed is dependent on the network conditions; subscriber location; distance from the nearest sites, number of active customers in the site etc.
3.6	Percentage of BTS carrying less than 80% of the average throughput in a license service area	<10%	This condition is OK.
3.7	Latency	Audio<150ms; Video<100ms; Data<250ms; Data Interactive<75ms	MTS provides only data services and not offering audio, video & data interactive services. For a typical data services the bench mark of < 250 ms seem to be fine. However we are not offering any comments for other services.
3.8	PDP Context Activation Success Rate	>=95%	This bench mark is fine, however this has to be monitored at PDSN level.
3.9	Drop Rate	<=2%	We understand this is PPP connection drop, and this bench mark is fine with us.