

Dear sir,

This is a response to [Consultation Paper No. 8/2015](#). The said paper is attached for reference.

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Question 1: Should the TSPs be allowed to have differential pricing for data usage for accessing different websites, applications or platforms?

Response: TSPs must not be allowed to have different websites, applications(apps) or platforms. This is to ensure an equal competing grounds for start-ups. The start-ups already face stiff competition from well-established organisations and corporates. If differential pricing for data usage is employed, resource-rich corporates will pay up the cash enough to kill any small timers or individual who dared to even test those waters. More importantly, this consultation goes, very directly, against the principle of **net neutrality**. As seen from uproar over the year, net neutrality is not something to toy with. The TSPs can profit very well even by adopting net neutrality. Data usage of the country is at all time high and is steadily increasing. As more locations become accessible by cellular towers, more people take their first steps into the Internet. As they increase their data usage, they upgrade their plans by asking for better speed (3G/4G LTE) or more data, or both. The financial graph only seems to rise. In short, the answer is no, any scheme implying or hinting towards data price differentiation must not be executed.

Question 2: If differential pricing for data usage is permitted, what measures should be adopted to ensure that the principles of nondiscrimination, transparency, affordable internet access, competition and market entry and innovation are addressed?

Response: Not applicable, since the above response to Question 1 categorically recommends against any form of data price differentiation.

Question 3: Are there alternative methods/technologies/business models, other than differentiated tariff plans, available to achieve the objective of providing free internet access to the consumers? If yes, please suggest/describe these methods/technologies/business models. Also,

describe the potential benefits and disadvantages associated with such methods/technologies/business models?

Response: Yes. As suggested in the response to Question 1, people who take their steps into the world of Internet, always seem to fall short on speed or data and so purchase a better plan to suit their needs. Furthermore, to lure people who only use their cellular phones for voice and text messaging services, 100-200 MB of 2G data can be given complimentary. This will open their world and when they reach their data limit repeatedly or are not satisfied with their speed, they will be encouraged to upgrade their data plan to 3G/ 4G or more data or both.

Potential benefits are very high, depending on the extent to which it is followed. Consumer base in India is only increasing. With popularization of dual sim smartphones, people now have two connections activated at all times. The main disadvantage is higher load on the network with increase in 2G data. But with the consumer base rise and revenue generated, the disadvantage will be easily overcome and be of little concern.

Question 4: Is there any other issue that should be considered in the present consultation on differential pricing for data services?

Response: It may not be emphasized enough that differential pricing for data services is against net neutrality, and it does not occupy as much of the content of discussions on net neutrality as other discriminatory practices. Net neutrality's importance has been repeatedly emphasized over the last year in India, and as such needs to be protected and nurtured.

Thank you,
Sagar Peswani