

30-12-2015

To

Mr. Vinod Kotwal

Advisor (F& EA)

Telecom Regulatory Authority of India

New Delhi – 11002.

Sub: Response to TRAI consultation paper dated 9th Dec 2015 on “Differential Pricing for Data Services” – Reg.

Atria Convergence Technologies Private Limited (ACT) is a licensed Class – A, Internet Service Provider (ISP) and have been providing internet broadband services in the cities of Bangalore, Hyderabad, Chennai and few other cities in the state of Andhra Pradesh.

In response to the consultation paper, we request the authority to take note of our reply against each of the questions raised by the Authority.

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

We are of the opinion that business models should be allowed based on market opportunity rather than legislating. However, while doing so care should be taken to ensure level playing field to all stakeholders including customers, platforms and content providers. Differential pricing is a means of allowing resource mobilisation for service provider in order to build expensive networks to be utilised by all for unfettered access.

However, care should be taken not to allow differential pricing for accessing individual web sites –instead differential pricing may be promoted for accessing different platforms and applications. For example, forbearance should not be applicable for individual web sites but can be made applicable for content provider platforms



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

To ensure principles of non-discrimination, transparency and affordability, legislation should be made that a positive promotion is allowable but not a negative exclusion/ experience degradation. For example, TSPs should not throttle the speeds of few web sites or platforms which is against the principles of internet freedom. However, a positive experience of quick and latency-free surfing should be allowable for ensuring positive experience to the customers.

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?

No Comments.

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

Any service that is chargeable by the TSP for providing better experience or better content should be excluded from the purview of legislation as there is a commercial consideration involved even if such consideration is notional or nominal.

Thanks & Regards

For Atria Convergence Technologies Pvt. Ltd.



Authorised Signatory

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