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Net Neutrality and Antitrust: Options for India

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Introduction

Long before an Englishman on primetime American television issued a call to arms to the internet citizenry with the now laconic phrase, "fly my pretties,"[1] net neutrality had been embedded in the basic architecture of the internet. The term 'net neutrality' was coined by Prof. Tim Wu in 2003.[2] The issues surrounding net neutrality are generally traced back to Lawrence Lessig's seminal book, *The Future of Ideas,* published in 2001. However, the end-to-end principle espoused by net neutrality formed one of the foundational ideas behind the invention of the internet itself. In 1972, a Frenchman named Louis Pouzin developed a network system called CYCLADES which was meant to be an alternative to the now popular ARPANET, the predecessor of the internet. One unique feature of the CYCLADES was that packets of information would be transmitted end to end, i.e., from the host computer to the end user without depending on the network for arranging the packets.[3] This would restrict the interference from telecom networks in the transmission of data. This is the only feature of the CYCLADES that was incorporated into the internet.[4] Net neutrality, therefore, predates the internet itself.

In India, net neutrality continues to remain at the centre of a highly complex policy debate. It defies definition and throws up difficult questions over substantive as well as implementation-related aspects of access to the internet. Until recently, the country had not had the opportunity to display public support for the principles enshrined by net neutrality. That changed when the Telecom Regulatory Authority of India (TRAI) released a consultation paper seeking public comments about the regulation of over-the-top service (OTT) providers.[5] By April 23, 2015, less than a month after the release of the consultation paper, a million Indian internet users had pledged support for the adoption of net neutrality rules.[6] Having seemingly arrived at a principled affirmation of net neutrality, the country must now turn its attention to its regulatory aspects.

Unsurprisingly, these issues will be informed by the debate in the United States. In the US, industry, academia and the administration have had longer to dwell on questions surrounding the enforcement of net neutrality.[7] Yet, a fundamental question remains unresolved: Which regulatory body and framework are best suited to help enforce net neutrality? Free market advocates have argued that the Federal Trade Commission (FTC), the antitrust watchdog in the US, is in a better position to keep a check on network neutrality violations than the Federal Communications Commission (FCC).[8] They argue that net neutrality violations are quintessentially practices borne out of abuse of dominant position, market foreclosure and creation of entry barriers. The antitrust regulatory body has decades of experience in empirically investigating such practices and imposing proportionate penalties. Therefore, if competition policy were to be enforced properly, the need for sectoral regulation would be eliminated.[9]

This essay examines whether the Competition Commission of India (CCI) can assume a similar role in enforcing net neutrality. It will trace the Commission's short history to determine whether it has adequate jurisdiction and the strength of precedent to regulate the internet.

Net Neutrality and the History of Telecommunication Regulation

The histories of the telecommunication sector in India and the US have been significantly different. One might even argue that on the issue of net neutrality India's telecom sector has been more progressive. One of the essential fulcrums on which the discourse on net neutrality rests is the law of common carriage. According to common carriage laws, once an entity has wilfully made a public undertaking to transport persons or property for compensation, he/she cannot discriminate against any one individual.[10] It cannot refuse carriage and must ensure transportation in an efficient and timely manner. In the US, internet service providers are exempt from common carriage requirements. In 1980, the FCC issued the Computer II[11] regime that made a distinction between providers of basic services and enhanced services. Telecom services that involved transmission of unprocessed data were classified as basic services and subject to common carriage. Internet services that required processing through computers were classified as enhanced services and were exempt. This distinction has carried on to this day in one form or another. Attempts by the FCC to revisit this mistake (like the Comcast Order of 2008)[12] have been struck down by US courts.

Fortunately, Indian telecommunications regulators have not attempted such a distinction between telecommunications and internet services. Internet services were first provided in India in 1995 by the erstwhile Videsh Sanchar Nigam Limited, then a government-owned company. Internet services were first opened up to the private sector in 1998. In 1999, TRAI published the New Telecom Policy (NTP) that tacitly clubbed internet services under telecommunications.[13] One of the basic aspirations of the NTP was to propel India towards becoming a technological superpower through a convergence of information technology, telecom and media. In order to achieve this goal, the Indian government aspired to convert public call offices (PCOs) into information centres by deploying Integrated Services Digital Networks (ISDN) therein. ISDNs allow simultaneous transmission of voice, data and video over a public network. PCOs are public utilities that are subject to common carriage laws. By extension, therefore, internet services were also made subject to these laws. The NTP also permitted cellular mobile service providers to provide data services in addition to their voice services. Therefore, unlike the US,

India has always treated the internet like telecom, i.e., as a publicly provided good. One of the problems of publicly provided goods is that since the cost to individuals for availing an extra unit of the resource is very small, some individuals tend to use an unfair amount of the resource until marginal utility becomes zero. A rather simplistic analogy is the hogging of bandwidth over a shared network. This is when the need for rationing the resource arises. Nobel laureate, former chief economist of the World Bank and Columbia University professor Joseph Stiglitz has suggested that one way of rationing these resources is by ensuring that the same amount is provided to every individual.[14] Thereafter, an individual who has a genuine need of more can buy additional units by privately purchasing them.[15]

As the prerogative for regulating publicly traded goods rests with the government, it will not be very difficult for Indian regulators to issue an explicit order subjecting telecom/internet service providers to common carriage principles. This will ensure that everyone has equal access to the common resource. There are, however, other considerations that must be taken into account. First, there is an ongoing debate in both North America and Europe about whether individuals should be allowed to upgrade publicly provided goods with private purchases.[16] This brings to mind the analogy of 'fast lanes and superfast lanes' often invoked by the telecom industry. But the very existence of the debate tells us that there are some beneficial considerations to allowing supplemental private investment. Blanket prohibitions on such a practice before the effects on the market are fully grasped may prove detrimental in the long run. Secondly, if a public utility is over-regulated, it will fall into the trap of the tragedy of anticommons, where despite an abundance of resources, due to the complexity of regulation, people who would otherwise make use of the resource are not able to access it. It can therefore be argued that the responsibility of studying the effects on the market must be vested with an organisation specifically tasked with doing so. We must examine not only the desirability but also the viability of a regime that does not impose a blanket regulation on the sector. This is where the possibility of using antitrust laws to enforce net neutrality becomes essential.[17]

Can the Competition Commission of India Claim Jurisdiction?

The US Supreme Court has clearly stated that telecommunication disputes (specifically, interconnection) are not immune from antitrust scrutiny.[18] In Verizon Communications vs. Trinko,[19] the court relied on a savings clause in The Telecommunications Act, 1996, to determine that the existence of an industry-specific regulator does not preclude an antitrust analysis. In India, the CCI has a broad mandate under the Competition Act. The Act's long title imposes a duty on the regulator to prevent practices that have an adverse effect on competition, protect the interests of consumers and promote competition in the markets. The CCI is also required to ensure freedom of trade carried on by other participants in markets and deal with all incidental matters. Therefore, agreements between telecom companies and OTT service providers to grant access to content by some and not others could fall squarely within this broad statement of jurisdiction. If it is established that a particular agreement or an industry practice could foreclose competition and adversely affect consumers, then the CCI can step in. In the past, antitrust regulators in India, US and Europe have stepped in to correct restrictive trade practices over the internet. Over the last few years, Google Inc. has come under the scanner of competition authorities worldwide. There have been concerns regarding Google misusing its dominant market share to curtail commercial free speech[20] in the advertising sector. One of the key antitrust

complaints against Google was that it had distorted natural search rankings by artificially favouring its own services over competing offerings. This behaviour had been under formal investigation by the European Commission (EC) since November 2010. On 14 February 2014, Google Europe arrived at a settlement with the EC to modify its user interface to give rival services significant prominence (and valuable screen space) on its search results pages.[21]

In the same year, the CCI also examined allegedly similar anticompetitive practices being undertaken by Google. The allegation against Google was that the search provider was prioritising its own advertisements and allied services (like YouTube) in its search results and was thus throttling competition. The commission subsequently fined Google Rs. 1 crore for non-cooperation with the commission's investigative arm.[22] While the order imposing the fine was stayed by the Delhi High Court on appeal, the court did not stay the substantive matter before the commission.[23] This reaffirms the CCI's jurisdiction over anticompetitive practices over the internet.

Regulating Vertical Integration And Abuse Of Dominant Position To Enforce Net Neutrality

Section 3(4) of the Competition Act prohibits anticompetitive agreements between enterprises at different stages in the supply chain. These include exclusive supply agreements and exclusive distribution agreements. In the recent past, many actions of internet and telecommunication service providers (ISPs) can be construed as exclusive distribution agreements. For instance, Airtel's 'One Touch Internet' provided services of only certain vendors for free.[24] Users were charged for visiting websites of vendors that had not partnered with Airtel. Airtel's partners for this service included companies like Facebook, Makemytrip and India Today. This, in essence, amounted to a denial of services offered by companies like MySpace, Yatra.com and Outlook, which compete with Airtel's partners. Similarly, in 2010, MTS sought to provide priority access to some websites like Yahoo India (in.yahoo.com), Wikipedia.org, Makemytrip.com, Shopping.indiatimes.com and Cricinfo.com to its users. These websites were made available to MTS wireless (MBlaze) users for free while access to other websites was charged at a rate of Rs. 2 per MB.[25]

Discrimination on the basis of content within websites has also been practiced by the ISPs in the past. Both Airtel and BSNL increased the speed of streaming Indian Premier League matches on YouTube.com for their subscribers.[26] All other content on YouTube was streamed at lower speeds. It has been claimed by Google that this offer by Airtel was not in pursuance of any agreement between them.[27] However, due to the clandestine nature of anticompetitive practices, the CCI is empowered to examine such practices even in the absence of an explicit agreement. Moreover, there are no clearly identifiable criteria for this discrimination. Therefore, it is logical to assume that these partner companies are selected on the basis of how much money they are willing to pay the particular telecom company. Similarly, Section 4 of the Competition Act prohibits any dominant party from abusing its dominant position in a manner that is anticompetitive. In order for Sec. 4 to be applicable, an enterprise must enjoy a position of dominance in the relevant geographical and product market. Secondly, it must also have used its position of dominance to cause appreciable adverse effect on competition in the market. In order to determine whether a particular ISP is in a dominant position, the commission examines the criteria listed under Sec. 19(4) of the Act. These include considerations like market share of the

enterprise, size and resources of the enterprise, size and importance of the competitors, and economic power of the enterprise. If a particular company is found to be dominant, the commission must then examine whether the company has abused its position of dominance.

Under Sec.4(1)(b)(i) of the Act, a dominant player can be said to have abused its position if it limits or restricts the production of goods and provision of services or the market for those products and services. Providing only specific websites as part of a free internet package can be considered an act of limiting the services of the content providers excluded from the package. Further, the content providers that are excluded may also put forward the argument that their exclusion amounts to a denial of market access by the ISPs. Both of these acts, i.e., denial of specific services and denial of market for said services, are prohibited under Sec. 4(1)(b)(i) of the Act.

Potential Benefits of *Ex post* Regulation

A significant difference in the antitrust approach to enforcing net neutrality is the stage at which the regulatory body acts. Under TRAI's mandate, there will be *ex ante* regulation of net neutrality, i.e., any form of network neutrality violation will be banned beforehand. Companies will then have to remain careful to not undertake any practices that may be in contravention of the adopted rules. These rules can either be specified by passing a new law affirming net neutrality or by imputing conditions in the licensing agreements of the service providers.[28] On the other hand, competition law follows an ex post regulatory framework. Ex post regulation requires the CCI to investigate and act only after a violation has occurred. Under the Competition Act, only merger control provisions as noted in Sec. 5 require ex ante regulation. under Sec. 3(3) of the Act, some horizontal agreements—or agreements between entities at the same level in the supply chain—have been deemed as per se illegal. This means that the horizontal agreements listed under the Act are illegal irrespective of their effect on the market. This is in contrast to the agreements specified under Sec. 3(4) of the Act, which lists out vertical agreements—those between entities at different levels in the supply chain—that could potentially adversely affect competition. Net neutrality violations like exclusive dealing and refusal to deal will come under Sec. 3(4). These violations will therefore be required to be examined on the basis of the actual adverse effect on competition.

This becomes even more relevant when considering that defining the scope of net neutrality is no easy task. Arriving at a consensus regarding what industry practices must be outlawed altogether is even more contentious. As the US Supreme Court noted in Leegin Creative Leather Products Inc. vs. PSKS Inc.,[29] *per se* rules should only be confined to restraints "that would always or almost always tend to restrict competition and decrease output."[30] In the broadband market, vertical integration is not an uncommon feature. In many cases, a vertical integration between the manufacturing stage (content provider) and retail stage (internet service provider) is undertaken purely for the efficient delivery of services.[31] This does not necessarily foreclose competition in the market or stifle innovation. In such cases, these practices must only be deemed illegal if they are proven to have adverse effects.

It may therefore be necessary to adopt an ex post mode of regulation to enforce net neutrality. An ex post mode of regulation will focus on investigating and prosecuting a violation after it has occurred instead of focusing on prevention and mitigation of market failure. This approach has several

advantages. Firstly, it will significantly reduce regulatory costs,[32] which will not have to be incurred until the violation has actually occurred. Secondly, the CCI's expertise in determining the actual costs to consumers may even be helpful in finally determining what the real-world effects of net neutrality are. The recent report of the Department of Telecommunications (DoT)-appointed committee to look at net neutrality has expressed a willingness to consider ex post regulation.[33] The report has suggested the incorporation of a specific clause in the ISP/TSP licenses that requires them to adhere to the principles of net neutrality. At the same time, the committee also acknowledges that "there are multitude of possibilities in designing tariff plans and it would not be possible to either pre-think all possibilities or determine its validity with respect to Net Neutrality principles."[34]

The report, therefore, suggests a combination of ex ante and ex post regulation.[35] It suggests that every tariff plan should be filed before TRAI prior to its launch in the market. TRAI will then examine whether the plan falls afoul of net neutrality principles and is anticompetitive. It also suggests that any complaints with regards to tariff plans shall be dealt with by TRAI on an ex post basis. While the idea of a specific clause affirming net neutrality in the licensing agreement is a welcome change, the combination of both ex ante and ex post regulation is not. If a tariff plan has already been approved by TRAI, then asking the same regulator to re-examine it after its launch in the market will be counterproductive. Market analysis of every single tariff plan by every single TSP is an extremely time and resource intensive process, to say the least. As has been discussed above, ex ante regulation is only advisable if a practice can be presumed to have an anticompetitive effect on the market. This is a very high standard. By DoT's own admission, many industry practices in the telecom sector will need closer examination to determine their anticompetitive effect and adherence to principles of net neutrality. This examination should then ideally be done by a body that has considerable experience in analysing the market effects of industry practices.

Potential Pitfalls of Antitrust Regulation

Violations of the principle of net neutrality can often have the effect of stifling competition in the market. This makes the CCI the appropriate body to enforce net neutrality. However, in many cases remedies under the Competition Act may not prove to be adequate in dealing with issue of net neutrality. For instance, violations of the provisions of the Act require that there must have been an adverse effect on competition in the relevant geographical and product market. The relevant geographical market is a market comprising the area in which the conditions of competition for the supply and demand of goods and services are distinctly homogeneous and can be distinguished from the conditions prevailing in the neighbouring areas.[36] In India, under the new unified licensing regime, licenses can be issued at the national level, service area level or district level. If mobile internet is considered the relevant product market, then it is theoretically possible to obtain, for example, an Airtel or MTS internet connection anywhere in the country. The entire nation shall consequently be considered the relevant geographical market. In such a case, even if a regionally dominant ISP violates net neutrality in providing its services, it can claim that all other ISPs in the country are its competitors. Therefore, the service provider shall not be considered dominant and will not be in violation of Sec. 4. The CCI will thus only be empowered to penalise violations of net neutrality by indisputably dominant ISPs. This does not reassert the fundamental principle of net neutrality that no service provider, regardless of its size, shall discriminate on the basis of content.

Finally, even the ex post approach of the commission is not without its critics. The commission can only intervene after the perpetration of an anticompetitive act. It is feared that if the CCI is chosen as the primary enforcer of net neutrality, then every alleged violation will have to be decided on a case-to-case basis. This determination will also require in-depth analysis of the effect of the actions of an ISP on the market. This may prove to be a time and resource intensive process. Moreover, it will also mean that the question of neutrality over the internet will remain in limbo for many years to come. Further, a case-to-case examination of the violation of net neutrality may even take us from a bad situation to worse. Net neutrality advocates claim that the existence of entry barriers is detrimental to startups. These companies do not have the financial muscle to either enter into arrangements for providing their services along with a basket of other services or pay for preferential treatment. This hinders innovation and prevents the entry of new players in the market. If the CCI is identified as the primary investigating body for net neutrality, every single violation will have to be brought to its notice. Thereupon, many of these smaller startups will have to enter into expensive and protracted legal proceedings to validate their stand. This, too, will cost time and resources that these companies do not have. This will then hamper innovation.

The enforcement of net neutrality requires that proactive measures are taken in that regard to ensure that no violations occur in the future. Whether the CCI or TRAI is the most appropriate body to enforce net neutrality is a question that will turn on difficult issues like zero rating. In the process, though, the fundamental principles of common carriage must not be compromised.

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