

## **ASSOCHAM's Response to TRAI Consultation Paper on "Proliferation of Broadband through Public Wi-Fi Networks"**

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**Q1. Are there any regulatory issues, licensing restrictions or other factors that are hampering the growth of public Wi-Fi services in the country?**

**ASSOCHAM's Response:**

At the outset, we would like to submit that Wi-Fi technology can only be used to create Wi-Fi hotspots and cannot be deployed to provide ubiquitous citywide coverage. For that purpose, mobile cellular technology can be used. This is because of the reason that the Wi-Fi access points can radiate at low powers for the short range or indoor communication on unlicensed bands to avoid the interference between the Wi-Fi access points using the same frequency.

Further, the notion of Wi-Fi service providers is incorrect as per the current Licensing structure. Any entity which wants to provide commercial Internet Access through Wi-Fi technology needs to obtain Unified License with Access service Authorization and can be provided only by licensed TSPs/ISPs who have their own network to extend the last mile access.

**Q2. What regulatory/licensing or policy measures are required to encourage the deployment of commercial models for ubiquitous city-wide Wi-Fi networks as well as expansion of Wi-Fi networks in remote or rural areas?**

**ASSOCHAM's Response:**

. Certain steps can be taken for the same. Some of them are as follows:

- To simplify the ROW rules and the removal of related bottlenecks in the process with reasonable restoration charges. Additionally, both Wi-Fi and cellular networks dependent on the wireline network to cater to its backhaul requirements. In this context, it is important to resolve the RoW issues in a timely manner.
- Development and sharing of public infrastructure such as electronic poles, traffic light poles, telephone line poles, etc is a critical element in the same. In addition, the safety, security and upkeep of such public infrastructure should also be ensured.
- Taking measures for creation of single window clearance system for various activities including the installation of tower, laying of fiber and creating infrastructure for Wi-Fi hotspots. The same measures needed to taken for Cellular networks.

- In addition to the availability of space, the continuous and uninterrupted supply of power is also critical for a WIFI Hotspot.
- There should be no levy of LF and SUC for the provision of Internet services for a minimum period of 5 years, both under UASL/CMTS/Unified Licence (Access Service Authorization) and ISP/Unified Licence (Internet Service Authorization).
- Any hotspot model which is implemented would differ in terms of its location and related economies of scale. The telecom service providers should be given the leeway to adopt and explore various business models so that Wi-Fi hotspot services can be provided to the general public on viable and sustainable basis.

**Q3. What measures are required to encourage interoperability between the Wi-Fi networks of different service providers, both within the country and internationally?**

**Q4. What measures are required to encourage interoperability between cellular and Wi-Fi networks?**

**ASSOCHAM's Response:**

At present, the TSPs use their telecom wallet to provide the telecom services. This wallet is also used for providing various VAS services, such as on-net and various VAS services. The Wi-Fi networks of TSPs are now expanding in reach, coverage and are also becoming popular. A TSP may offer bundled data packages which apart from offering their own data network and Wi-Fi access points, may also provide the access to the WIFI access points of their partners/other TSPs' through their own wallet.

Notwithstanding the above, the telecom service providers should be given the freedom and flexibility to offer commercial propositions to other parties for the purpose of infrastructure sharing. Thus, the freedom to explore various commercial arrangements for sharing of Wi-Fi access points will encourage the development of Wi-Fi access points as a viable and sustainable business model. Such sharing arrangements are of benefit to the end customers and businesses alike and will also make the services more affordable. Any regulatory intervention on this front tantamount to curbing the flexibility of business operators and the same should be avoided.

,No regulatory intervention is required for successful growth of this business. The Wi-Fi services are currently being provided by a UASL/CMTS/Unified Licence (Access Service Authorization) and ISP/Unified Licence (Internet Service Authorization).

**Q5. Apart from frequency bands already recommended by TRAI to DoT, are there additional bands which need to be de-licensed in order to expedite the penetration of broadband using Wi-Fi technology? Please provide international examples, if any, in support of your answer.**

**ASSOCHAM's Response:**

At present, the mass scale usage of Wi-Fi services is substantially low vis a vis the quantum of unlicensed spectrum allocated for provision of these services (483.5 MHz). However, the 255 MHz of access spectrum allocated to TSPs across the bands is catering to the telecom needs of more than one billion wireless customers throughout the country. Therefore, it is suggested that any new spectrum band should not be de-licensed to promote Wi-Fi services as the current quantum of unlicensed spectrum allocated is not fully utilized.

**Q6. Are there any challenges being faced in the login/authentication procedure for access to Wi-Fi hotspots? In what ways can the process be simplified to provide frictionless access to public Wi-Fi hotspots, for domestic users as well as foreign tourists?**

**ASSOCHAM's Response:**

The current process of login/authentication has been implemented after taking into consideration the national security concerns. DoT in consultation with Ministry of Home Affairs may review the scope of the current process to ensure that it does not become a hindrance in the proliferation of Wi-Fi services and without compromising the national security requirements

**Q7. Are there any challenges being faced in making payments for access to Wi-Fi hotspots? Please elaborate and suggest a payment arrangement which will offer frictionless and secured payment for the access of Wi-Fi services.**

**ASSOCHAM's Response:**

Telecom Service Providers provide Wi-Fi services for which payment can be made through a) prepaid coupons, b) payment wallets / online payment solutions.

Service providers can also use their payment wallets for offering Wi-Fi services as is being done for the pre-paid customers.

A TSP can either become a merchant of semi-closed wallets/open wallets or tie-up with such merchants so that payment for subscription of Wi-Fi can be facilitated through these semi-closed/open wallets. We do not recommend the regulatory intervention in the form of special measures for payment solutions for Wi-Fi service.

**Q8. Is there a need to adopt a hub-based model along the lines suggested by the WBA, where a central third party AAA (Authentication, Authorization and Accounting) hub will facilitate interconnection, authentication and payments? Who should own and control the hub? Should the hub operator be subject to any regulations to ensure service standards, data protection, etc?**

**ASSOCHAM's Response:**

In our opinion, the concept of Common Hub should not be used for the purpose of Authentication. The Hub Based model is complex and cumbersome as it would require connectivity with all TSPs offering Wi-Fi services in India. Moreover, TSPs would hesitate to connect their network with a third party with a view to protect the integrity of their network and payment wallet.

The authentication of the subscriber is the responsibility of the service provider who owns the customer and outsourcing of these activities should be done keeping in mind the potential threat faced from the perspective of national security.

**Q9. Is there a need for ISPs/ the proposed hub operator to adopt the Unified Payment Interface (UPI) or other similar payment platforms for easy subscription of Wi-Fi access? Who should own and control such payment platforms? Please give full details in support of your answer.**

**ASSOCHAM's Response:**

Various players are at present providing the Internet services (including Wi-Fi) through prepaid coupons, agents/distributors or through online payment solutions. Tie ups have also been made with various semi-closed wallets which enable the customers to pay for using the Wi-Fi services. Such payment mechanisms have evolved according to the requirement of Wi-Fi services market.

**Q10. Is it feasible to have an architecture wherein a common grid can be created through which any small entity can become a data service provider and able to share its available data to any consumer or user?**

**Q11. What regulatory/licensing measures are required to develop such architecture? Is this a right time to allow such reselling of data to ensure affordable data tariff to public, ensure ubiquitous presence of Wi-Fi Network and allow innovation in the market?**

**ASSOCHAM's Response:**

Internet services including Wi-Fi can be provided only by those entities who hold a valid UASL/CMTS/Unified Licence (*Access Service Authorization*) or ISP Licence/Unified Licence (*ISP Service Authorization*). Moreover, the reselling of telecom services including data services cannot be done without obtaining a Unified Licence (VNO). Therefore, any entity who wants to provide Internet services to any consumer or user has to take a telecom licence.

To promote data usage and to ensure minimal data wastage, many TSPs have launched plans in which a customer can share its available data with another customer. However, such sharing of data by any customer with another customer against commercial consideration would tantamount to reselling of data services, which cannot be done without obtaining a valid telecom licence.