स्वच्छ भारत
एक कदम स्वच्छता की ओर

MTNL/RA/TRAI-C.P.-14/2016
Dated 26.08.2016

To,

The Advisor (B &PA)
TRAI, New Delhi

Sub. : Comments on TRAI Consultation Paper dated 13.07.2016 on " Proliferation of Broadband through Public Wi-Fi Networks".

TRAI issued Consultation paper on 13.07.2016 on the aforesaid subject and asked the various stakeholders to comment on the issues involved in the consultation paper. In this reference following comments are submitted for consideration:

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

MTNL Comments:

1. There is lot of interference and congestion in the 2.4Ghz ISM band . It should be made mandatory that all Access Points, Users devices should be dual band. (2.4 GHz + 5 GHz).
2. Extending of backhaul bandwidth on fixed network like OFC is costly due to ROW charge being around 80% of the total backhaul cost. Therefore Right of Way may be made easier and less costly.
3. Reference Interconnect Agreement regarding National and International WiFi Roaming needs to be finalized.

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?

MTNL Comments: Wi- Fi based ubiquitous coverage is neither commercially viable nor feasible.

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?

MTNL Comments: To encourage interoperability between different Wi-Fi providers, data offload architecture used for offloading data of mobile customer to wi-fi may be used, however TRAI may provide framework in this regard, like for IUC charges for wifi data uses in roaming scenario.

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.

MTNL Comments: Other than 2.4, 5 GHz band, free band in 20 GHz may be used for indoor coverage for high speed connectivity.

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?

MTNL Comments: In addition to the methods, suggested by TRAI in this CP, it is also felt that at tourist places or else, where entry is on paid tickets, two type of tickets may be provisioned one without Wi-Fi and another with Wi-Fi. Both the tickets may be charged on different prices. In Wi-Fi tickets, the pin for login may be printed which can be seen by scratching it.

The PIN can be used by visitor to get OTP on his mobile to ensure proper authentication and security requirement.

The outlets selling vouchers may use Aadhar based authentication. Thereafter one OTP may be issued to the customer personally, and subscribers may use this OTP and Aadhar number to access the internet through wi-fi access point.

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.

MTNL Comments: Following payment arrangement may be made:

1. Physical purchase of coupon with authentication procedure as suggested above in Q6.
2. Payment through credit card/debit card/payment gateway/internet banking/wallet etc.
3. Payment through UPI as suggested vide para 3.35 and 3.36 of this CP.
4. Any other payment methods which the authorities deem fit.

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?

MTNL Comments: It May be adopted but it is perceived that this model will only succeed if it is owned by GoI/ DoT to ensure fairness, transparency in accounting of data usage. It is also required to be ensured that AP's of all device manufacturers should be technically compatible with all available commercially grade AAA.

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.

MTNL Comments: This will facilitate the process but before that a proper justification based on cost-benefit analysis is to be done. If agreed by all stakeholders and NPCI, NPCI may own the platform.

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?

MTNL Comments: Only licensed ISP should be allowed to offer service;.

12. What measures are required to promote hosting of data of community interest at local level to reduce cost of data to the consumers?

MTNL Comments: May be promoted within regulatory framework.

Q13. Any other issue related to the matter of Consultation.

MTNL Comments: No comment.

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