



Representing the ecosystem of Internet -Bharat Model

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Sub: CCAOI's comments on the TRAI Consultation Paper on Proliferation of Broadband through Public WiFi Networks.

Dear Sir,

At the outset, we wish to thank TRAI for giving us the opportunity to submit our comments on the Consultation Paper on Proliferation of Broadband through Public WiFi Networks.

Please find enclosed a copy of our comments on the paper.

Thanking you and looking forward for a favorable consideration of the suggestions, in the interest of growth of internet in the country.

Yours very truly,
for CCAOI

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CCAOI is grateful for getting an opportunity to present its views on the consultation paper released by the TRAI on issues pertaining to differential data pricing.

Please find below our response to the questions where responses have been sought.

Question 1:

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

CCAOI Response:

The current regulatory policies are not hampering the growth of public Wi-Fi services in the country.

While Wi-Fi services have the potential to provide internet connectivity to a large section of users in rural and urban areas, however, lack of an “India-centric” business model has hampered its growth so far.

Question 2:

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

CCAOI Response:

India needs to adopt an India centric business model to ensure the expansion and adoption of Wi-Fi networks to urban as well as rural areas. For that we suggest,

1. Local Cybercafes/ CSC's/ kiosks/ public Internet Access point entrepreneurs should be encouraged to provide Wi-Fi services.

Encouraging these local entrepreneurs to provide Wi-Fi services would only increase the reach and adoption of the Internet further. Moreover, their easy accessibility, understanding of the business and locality and ability to cater both to people who can access internet themselves or need assistance would help to proliferate public Wi-Fi usage. In a country, where nearly 37% of the population are not literate and depend on assistance, these entrepreneurs are the only ones who are equipped to cater to this segment by providing assisted internet services.

2. Further, India needs to **adopt a pay as per use model**. In a country with low purchasing power, preferring a ‘sachet model’, mass adoption of Wi-Fi services can only be successful when people can pay as per their usage and not have to block money indefinitely. Cybercafes/ CSC’s/ kiosks/ Public Internet access Points are already providing such a model and therefore should be promoted.
3. For Cybercafes/ CSC’s/ kiosks/ Public Internet access Points, the **licensing process need to be simplified and need light handed regulation**. This would encourage them to set up Wi-Fi hotspots.

As an association representing the interest of the Cybercafes and public internet access points, CCAOI would request TRAI to encourage these entrepreneurs to set up and run Wi-Fi services across the country. This would not only improve internet penetration in the country but also encourage local entrepreneurship.

Question 3:

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

CCAOI Response:

There has to be changes in regulations for encouraging interoperability between Wi-Fi networks and different service providers both within and outside the country. Also, there has to be technological innovation to ensure that equipments working in different bands and networks are interoperable.

Question 4:

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

CCAOI response: No comments

Question 5:

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.

CCAOI response: No comments

Question 6:

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?

CCAOI Response:

Yes, there are challenges faced in the login/authentication procedure for access to Wi-Fi hotspots.

- The current login and authentication process are not user friendly. As the authentication process is very tedious and takes a long time, many times people leave it half way
- Further, the procurement process is tedious. In many cases, barring airports or specific shops/ locations, after the initial free minutes, in case a user (domestic and foreign) wants to pay and use the Wi-Fi services, they do not know where to obtain/ purchase the access details. There should be adequate information available on the nearest locations where people can purchase Wi-Fi access.

To promote usage of Wi-Fi services, CCAOI suggests:

1. Simplifying the login and activation process

A unified login process with a central data reservoir should be created, which would ease the login and activation process. Here, a user would only be asked once to provide Photo ID proof, which would then be scanned by the Wi-Fi service Provider and stored in the central reservoir. The customer in turn would be given an ID with which she/he would be able to authenticate and then access Internet in all Wi-Fi spots, without having to refill and submit a photo ID proof the next time.

2. Providing adequate information

Providing adequate information on where (i.e. Nearest location) and how a person can obtain/ purchase Wi-Fi services. This could be in the form of information boards or even pop ups/ alerts, while a person is attempting to access the internet from the Wi-Fi hotspot.

Question 7:

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.

CCAOI Response:

Yes, there are challenges being faced in making payments for access to Wi-Fi hotspots.

- Firstly the **price to access internet from Wi-Fi hotspots**, currently, especially in the airports, etc. **are quite high**, after the initial free time, when compared to the data charges on mobile.

- Secondly, most **people prefer to pay as per their usage** and not block amount unnecessary which they cannot use elsewhere.
- Thirdly, the limited people who have a credit card or online banking facility, due to **security concerns** do not want to use it in a public network.

To create a friction free and secured payment mechanism for the access of Wi-Fi services, we from CCAOI would suggest the following:

1. The **Wi-Fi rates** while accessing from the hotspots **need to be nominal**.
2. **Promote Pay as per the usage** policy, rather than a prepaid model.
3. In case of **Prepaid mode, the balance left** after internet access at one Wi-Fi Hotspot **should be usable** in another or users should be able to **get back the unutilized amount**.
4. Last but most importantly, **Cybercafes/ CSC's/ Kiosks or any public Internet access Points** across the country should be allowed not only to **provide W-Fi services from their premises but also be points where people can make payments**.

Question 8:

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?

CCAOI Response:

To improve the dismal internet penetration the country, the need of the hour is to allow all models to operate, atleast as a pilot and then whichever model the customers prefer or is beneficial for them, should be promoted.

Question 9:

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.

CCAOI Response:

A central and Unified Payment Interface (UPI) or other similar payment platform would definitely be beneficial for easy subscription of Wi-Fi access.

This platform, however, should be neutral and perhaps managed by a consortium of ISPs, service Providers, Banks, etc.

Question 10:



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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?

CCAOI Response: No Comments.

Question 11:

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?

CCAOI Response: No Comments.

Question 12:

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

CCAOI Response: No Comments.

Question 13:

Any other issue related to the matter of Consultation.

CCAOI Response: None