

**REF: DRAFT-THE TELECOMMUNICATION TARIFF (SEVENTIETH AMENDMENT) ORDER, 2024**

To

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(Through e-mail: fa@tra.gov.in)

Counter comments/inputs on above subject is submitted as follows:

- 1) Stake holders/responders of this CP have to note the following points:
  - People able to fulfilling their communication needs through data connectivity even not having mobile number/network, by connecting to a wi-fi hot-spots or FTTH connections.
  - Many residential/office users connect their office computers & smart phones to their home/office wi-fi.
  - Mobile network/mobile data needed to the people who moves across geographical areas.
  - In remote/un-connected rural areas, in small villages, if a public wi-fi is available, major communication needs can be fulfilled.
- 2) Authorities need to have the data/figures about the Stationary Data Users (SDUs).
- 3) It is observed, one of the stake holders mentioned that, utilizing data through mobile network is secured as compared to the security of utilizing data through wi-fi. This is raising doubts among the users of wi-fi/hotspots/PMWANI. Authorities needs to clarify about the security of PM WANI or public wi-fi infrastructure. This is important because of threat of cybercrimes/frauds around us. Immediately a detailed press-release to be given to caution the public about the security of the public wi-fi/PM WANI/PDOs.
- 4) As per information available on net, it is understood that national authorities laid optical fibre cables to all left-out/un-covered villages using USO funds. Now, it is the responsibility of licenced service providers to deliver their services to all remote/un-connected villages, utilizing that optical fibre network. As well it is also learnt that national authorities erecting towers in all the left-out/un-connected villages by utilizing USO funds. I.e. the basic infrastructure required for delivery of telecom services is established by national authorities. Now, simply service providers start to deliver their services utilizing this USO infrastructure.
- 5) Now onwards, paying “penalty” in the form of USO fund for not delivering service to the financially non-viable areas by service providers is to be withdrawn and prescribe strict instructions for delivering services across their licenced geographical areas including such non-popular/remote/un-connected villages also with immediate effect.
- 6) Public dash board to be made available, where-in coverage of telecom services across licenced areas of each service provider to be displayed. Telecom Servies means fixed/wireless voice & data. This is to ensure transparency of governance.
- 7) Basing on the users/load on the public wi-fi hot spot/PM WANI/PDOs, the input data capacity to that infrastructure to be decided. For example\*:

Sl. No.	Peak-time simultaneous users for a PDO/Wi-fi hot spot/PM WANI	Input data connectivity
1	<=25	FTTH with basic bandwidth & speed with free usage of data in GB
2	>25 <=100	FTTH with higher bandwidth & speed with more free usage of data in GB
3	>100	Dedicated bandwidth with matched FTTH as stand-by. The capacity of this input dedicated bandwidth may be increased basing on the distribution side i.e. load i.e. simultaneous users in peak time.

\*This to elaborate the concept. Figures/capacities may vary.

To manage quality of access (QOS) at PDOs, such standards are to be prescribed.

With best wishes  
Vas KSS