

Aircel Response to TRAI Consultation Paper on Proliferation of Broadband through Public Wi-Fi Networks

As one of the telecom licensee, Aircel welcomes the opportunity to comment on TRAI's Consultation paper on Proliferation of Broadband through Public Wi-Fi networks and would be happy to explain further, should TRAI desires so.

We sincerely believe that Wi-Fi networks can provide huge impetus to the Government's Digital India program and can help improve upon Digital literacy in India. We are also eager about the National Optic Fiber Network, which will provide necessary bandwidth & capacity, leading to proliferation of Internet and Wi-Fi services in the rural areas.

Our question-wise response to the consultation paper is as following:

Question-wise Response

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

&

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?

Aircel Comments:

It is our considered view that there is no regulatory issue or licensing restriction that is hampering the growth of public Wi-Fi services. Under prevalent licensing norms, an access telecom licensee or an ISP can provide Internet services which include Wi-Fi services. Based on consumer demand and uptake, Wi-Fi services are spreading fast and providing an encouraging alternate to the internet through cellular networks.

It would be inapt to say that the cost of only Wi-Fi should be made affordable to consumers whereas there are other telecom services also which consumers would prefer over Wi-Fi services. The cost of providing telecom services (which includes Wi-Fi) has some major cost factors attached viz. Spectrum through Auction, Licensing/Regulatory Levies (LF/SUC) and Compliance cost and Networks. If costs like Spectrum price and Licensing/Regulatory levies are brought down, the overall cost and thus, the tariffs for consumers can be brought down significantly for all telecom services including Wi-Fi.

Further, there are other accessibility (RoW) & infrastructure related (power/diesel etc) issues being faced by telecom service providers, which should be driven and addressed by TRAI for resolution. If such issues are addressed and telecom is treated as Essential

Infrastructure, it would certainly lead to proliferation of telecom networks including Wi-Fi hotspots.

Therefore, we request TRAI intervention in pursuing reduction in Spectrum price and Licensing/Regulatory levies, treating telecom networks as Essential Infrastructure and resolution of accessibility/power/diesel issues etc.

Wi-Fi technology works on unlicensed band with an objective of reducing dependence on cellular network or for cellular offloading. The usage of unlicensed band is on a low power to avoid interference issues.

Further, we would also like to draw your attention towards DoT's security guidelines dated 23.02.2009 regarding provision of Wi-Fi Internet service under delicensed frequency band. Considering security concerns on Wi-Fi networks and same being misused by anti-social elements, DoT has provided for security norms to be followed for provisioning of W-Fi services, which can only be enforced on a telecom licensee, who has been granted license under Indian Telegraph Act. Hence, invariably there can't be any entity other than an Access licensee or ISP, who can provide such Wi-Fi services to public.

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?

Aircel Comments:

We are of the view that interoperability in between the Wi-Fi networks should be left to mutual agreements among the operators. As we understand, Interoperability in between Wi-Fi networks would mean that customer of one of the Wi-Fi network service provider would be able to enjoy Wi-Fi services of another service provider at a different hotspot. However, this appears to be akin to roaming of one service provider onto the network of another service provider, which are subject to commercial agreements of operators as per licensing conditions and can't be regulated.

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.

Aircel Comments:

We do not foresee any need for additional bands to be delicensed at this stage.

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?

Aircel Comments:

In our view, the existing DoT process of login/authentication based on an OTP is working fine. Various banking & financial transactions and various e-Governance architectures are based on OTP and we feel it should be continued with.

In so far foreign tourists are concerned, they have two types of mediums to access the Wi-Fi networks. Firstly, by using their foreign connections for roaming in Indian networks and secondly, by subscribing to new connections (SIM or for Wi-Fi) in India by following the DoT's subscriber verification norms for usage by Foreign Nationals.

These norms have been issued by DoT after consultations with Ministry of Home Affairs (MHA) and consultations on security aspect hence, any change being envisioned should be cleared from the same aspect by DoT and MHA, besides from licensing norms.

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.

&

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?

&

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.

Aircel Comments:

There are no substantial challenges being faced in terms of making payments for access to Wi-Fi hotspots. Generally, there are two types of payment deduction modes, firstly through purchase of card/coupon from the Hotspot administrator/service provider, secondly, through deduction from mobile talk time (if Wi-Fi service being availed from same service provider) and thirdly, through various payment gateways.

We believe such payment solutions should be left for market forces to help evolve in customer interests and should not be put to test of regulating them in a specific form.

There is no need of bringing in any additional hub based or central structure.

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?

Aircel Comments:

Reselling of data or for that matter any telecom service, has been allowed through MVNO route. Thus, there is no need to create multiple layers and any such entity interested in reselling of data, should come through MVNO route.

Under prevalent licensing norms and Indian Telegraph Act, only a licensed operator can deal with selling of telecom services and no other unlicensed entity can become a data service provider.

We are of the view that the fundamental regulatory & licensing structure is not tinkered with and not made complex else, there can be some fly by night small entities who may misuse and get undue enrichment, at the cost of licensed operators who have invested billions in networks and providing service to the customers.

Q12. What measures are required to promote hosting of data of community interest at local level to reduce cost of data to the consumers?

Aircel Comments:

This can be done presently as well and does not need any Regulatory support.

XX----- END OF DOCUMENT -----XX