



To,

Advisor (Broadband & Policy Analysis)  
Telecom Regulatory Authority of India  
Mahanagar Door Sanchar Bhawan  
Jawahar Lal Nehru Marg, (Minto Road)  
New Delhi-110002

Kind Attention: Sh. Arvind Kumar, Advisor (Broadband & Policy Analysis)

No: Regln/1-33/2014/1706

dated: 30-08-2016

Sir,

Sub:- Comments of BSNL on TRAI's consultation paper on "Proliferation of Broadband through Public Wi-Fi Networks"

Kindly refer to the Consultation paper no.14/2016 on "Proliferation of Broadband through Public Wi-Fi Networks". In this regard the BSNL's comments are as follows:-

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

**BSNL's Comments:** No regulatory issues from BSNL perspective.

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?

**BSNL's Comments:** Only licensed ISP (Internet service providers) should be allowed to provide internet services on Wi-Fi to public so as to ensure LEA requirements of authentication & proper records of internet usage by the individuals.

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

**BSNL's Comments:** It depends on technology readiness of the technology vendor. Inter-operability may not be possible presently.

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

**BSNL's Comments:** It depends on technology readiness of the technology vendor. Mobile data offload can be the solution.

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.

**BSNL's Comments:** No assessment as of now, may be assessed after reasonable deployment of internet over Wi-Fi technology.

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?

**BSNL's Comments:** Mobile data offload/ EAPSIM authentication may ease the process of authentication. Visitors, domestic as well as international is required to buy mobile



SIM of the concerned service provider OTP based authentication so that LEA requirements are ensured.

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.

**BSNL's Comments:** No challenges as of now.

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?

**BSNL's Comments:** There is no need of HUB based model. Only ISP should provide complete bouquet of services to ensure LEA requirements of authentication & proper records of internet usage by the individuals.

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.

**BSNL's Comments:** There is no need of HUB based model. Only ISP should provide complete bouquet of services to ensure LEA requirements of authentication & proper records of internet usage by the individuals.

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?

**BSNL's Comments:** No

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?

**BSNL's Comments:** No, as of now

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

**BSNL's Comments:** Not related

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

**BSNL's Comments:** No comments as such.

  
30/9/16  
Raghuvir Singh  
AGM (RegIn-II)