

TAIPA submission on TRAI consultation note on ‘Model for Nation-wide Interoperable and Scalable Public Wi-Fi Networks’

1. We would like to thank the Telecom Regulatory Authority of India (TRAI) for releasing this consultation note on ‘Suitable Model for Nation-Wide Interoperable and Scalable Public Wi-Fi Networks’. TRAI had discussed the importance of broadband penetration by public Wi-Fi and the issues hindering its growth in its consultation paper titled ‘Proliferation of Broadband through Public Wi-Fi Networks’ released earlier during the year.
2. A workshop was organized by TRAI on 28th September 2016 in Bangalore wherein experts from different areas and industry segments presented their ideas/ solutions for addressing the issues hindering the growth of Wi-Fi in the country.
3. In its earlier consultation paper TRAI has discussed issues related to technical interoperability, payment & monetization models, collaborative partnership between various entities of the Wi-Fi ecosystem and security of such systems.
4. The broadband penetration in the country is abysmally low when compared to the other countries in the Asia-Pacific region. The Wi-Fi services play a pivotal role in enhancing the broadband coverage and bridging the digital divide in the country. Initiatives by the government such as digital India and smart cities can be achieved only if the entire country is digitally connected. Public Wi-Fi is a key element of the Wi-Fi ecosystem and will play a pivotal role in enhancing the broadband coverage thereby connecting the unconnected. This consultation note rightly suggests that the government’s vision for a digital India is a prime motivator for large scale deployment of public Wi-Fi networks
5. It is pertinent to highlight that a robust telecommunication infrastructure forms the backbone for deployment of public Wi-Fi networks. There are various advantages of public Wi-Fi networks such as 1) better in-building coverage 2) mobile data offload from macro sites 3) ubiquitous and seamless internet connectivity 4) over the top and affordable access to services. Thus, provision of internet via public Wi-Fi is an effective tool to achieve the digital India vision.
6. The issues and challenges which are presently faced while by deploying the necessary infrastructure for public Wi-Fi hotspots may be overcome by encouraging Infrastructure Providers (IP-I) to install infrastructure for public Wi-Fi hotspots.
7. IP-I, a category formed by DoT in the year 2000, installs passive telecom infrastructure such as towers, dark fibres, ducts, etc. which enables telecommunication services to the consumers by telecom service providers. The infrastructure installed by IPs is shared in a non-discriminatory and transparent manner to the telecom services providers which leads to a swift roll-out of services and reduced capex/opex.
8. **Role of Infrastructure Providers in enabling Public Wi-Fi:** A model similar for building telecom towers may be followed wherein the IP installs the infrastructure for Wi-Fi and the ISP/TSP provides the services. Installing individual infrastructure by service providers will result in multiplication of network and hence this model shall lead to huge avoidable costs.

9. Telecom infrastructure providers play a vital role in realising the digital India vision and lead to an inclusive growth. Therefore, Infrastructure Providers should be encouraged to establish the necessary communication infrastructure for Wi-Fi Networks.