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VOICE Comments on "Model for Nation-wide Interoperable and Scalable Public Wi-Fi Networks"

1 message

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Fri, Dec 9, 2016 at 2:30 PM

To: broadbandtrai@gmail.com

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To,

Shri Arvind Kumar, Advisor (Broadband & Policy Analysis),

TELECOM REGULATORY AUTHORITY OF INDIA

MAHANAGAR DOORSANCHAR BHAWAN,

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SUBJECT: VOICE Comments on "Model for Nation-wide Interoperable and Scalable Public Wi-Fi Networks"

Voluntary Organisation in Interest of Consumer Education (VOICE) is a consumer protection group set up by teachers and students of Delhi University in 1983.

We at VOICE as part of our advocacy initiative in Telecommunications continuously raise different issues with Policy makers impacting consumers based on the knowledge through Consumer feedbacks.

As a registered CAG we are in forefront of providing inputs to the Government, Regulatory authorities, consumers and business community at large related to consumer concerns and interests.

In continuation of this effort on behalf of consumers we at VOICE have following COMMENTS on "**Model for Nation-wide Interoperable and Scalable Public Wi-Fi Networks**"

Q1. Is the architecture suggested in the consultation note for creating unified authentication and payment infrastructure will enable nationwide standard for authentication and payment interoperability?

Yes, it is a workable model-similar to hailing a CAB through APP.

Q2. Would you like to suggest any alternate model?

Yes, an alternate model is something very similar to like Hotel Accommodation Apps – say "OYO Rooms". So all possibilities like casual access / pre-paid and post paid access through App or universal access for all registered providers registered on a given App can be availed. So this architecture is open enough to welcome providers as well as facilitators (Apps) and takes care of user registration, payment system as well as hand shake between providers, facilitator and users.

Q3: Can Public Wi-Fi access providers resell capacity and bandwidth to retail users? Is "light touch regulation" using methods such as "registration" instead of "licensing" preferred for them?

Since the ultimate goal is to achieve universal availability of Internet with reasonable controls, "light touch regulation" is preferable specially if "Hotel Booking model" is adopted.

Q4. What should be the regulatory guidelines on "unbundling" Wi-Fi at access and backhaul level?

Each step of the process should be able to operate independently as suggested in the alternate "Hotel Booking Model" including all permutations / combinations as well as technologies. Regulation in this case should be more inclined

towards facilitation rather than control. Additionally some incentives should be provided to the Back-end Internet bandwidth providers to attract these micro-entrepreneurs.

Q5. Whether reselling of bandwidth should be allowed to venue owners such as shop keepers through Wi-Fi at premise? In such a scenario please suggest the mechanism for security compliance.

Yes, it should be encouraged with strict guidelines for security requirements and may be 3rd party audits. The mechanism is partly already in place at Airports/hotels.

Q6. What should be the guidelines regarding sharing of costs and revenue across all entities in the public Wi-Fi value chain? Is regulatory intervention required or it should be left to forbearance

and individual contracting?

No regulatory intervention is desirable except for ensuring against monopolistic market situation. Regulation are rather required to facilitate the whole process and entities opting for this business.

There is a large unused OF capacity available with almost all operators as well as other entities like Railways, Delhi Police all over Indian including the MOFN project which should be exploited.

As mentioned above, we need to incentivise ISPs based on them being start-ups or operating in semi-urban / rural / remote areas to ensure wider availability of internet / faster & wider spread of internet.

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