

ISPAI Response to TRAI Consultation Note 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?

ISPAI Response:

No, the suggested centralized system will impact the quality of Internet user experience and will make authentication very slow and cumbersome.

In many cases, especially Rural and High usage areas, users will not be able to get authenticated at all. There are already existing challenges of SSID Cloning and Duplicate SSID, which will escalate more problems when it comes to centralized authentication. Apps will generate more authentication data payloads and National Internet Grid will get more choked with authentication data than actual Internet data. Centralized authentication should not be there at all and instead authentication must happen at Local ISPs / TSPs so that there is negligible authentication data pay loads and more of quality Internet.

The paper does not provide any background or justification for the need for a centralized payment infrastructure. Current electronic payment processes and systems, in India, have evolved over the years and are very secure. Every TSP/ISP in the country have their own, offline and online, secure payment systems in place which are proven, over the years, to be working well. So what is the justification of creating a centralized payment system with all its problems such as setting up of a clearing house, billing and settlement across providers etc? We believe it will create more problems than it will resolve. Fundamentally we do not see the justification for this.

Q2. Would you like to suggest any alternate model?

ISPAI Response: ISPs / TSPs / VNOs may be allowed to follow any model, provided it is within the by-laws and compliances of their license and in the interest of the citizens Internet users and customers.

We would like to submit that the Sharing of Active infrastructure amongst Internet Service Providers for Wi- Fi Access Points, Routing & Switching devices. It may be noted that TRAI have recommended Infrastructure sharing and accepted by DOT but the terms of license are still ambiguous and need further clarity. The present DOT UL – VNO license Clause 32.2 states that

“32.2. Sharing of Active infrastructure amongst Service Providers based on the mutual agreements entered amongst them is permitted. Active infrastructure sharing will be limited to antenna, feeder cable, Node B, Radio Access Network (RAN) and transmission system only.”

To reduce ambiguity and provide clarity the clause may be amended to include Wi-Fi Access points, Routing & Switching Devices:

“Sharing of active infrastructure amongst Service Providers based on the mutual agreements entered amongst them is permitted. Active infrastructure sharing will be limited to antenna, feeder cable, Node B, Radio Access Network (RAN), transmission system, Wi-Fi Access Points, Switching & Routing Devices.”

Such clause should be applicable to all categories of licenses including standalone ISP license, UL – ISP license, UL- VNO license.”

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?

ISPAI Response:

There is no separate category of service provider as “Public Wi-Fi Access Providers” nor service by the name of Wi-Fi access service, public or private, is separately defined or licensed in the present day licensing regime of the country.

If TRAI feels that is a need to introduce new category of service and/or service providers then the same has to be done as per the provisions of the regulatory process defined and delineated under Section 11(1) (a) I and II of the TRAI Act.

Reselling of telecom services is currently prohibited for all telecom services under telecom service licenses other than VNO licenses. New envisaged category of Public Wi-Fi access providers can take UL-ISP license.

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

ISPAI Response: There is no need for any additional regulatory guidelines. Existing regulations cover it.

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

ISPAI Response:

Reselling of telecom services is currently prohibited for all telecom services licenses other than VNOs. Venue owners should either take VNO license or become franchisees of telecom service licensees.

Any Reseller when permitted should be given the responsibility of security compliance.



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?

ISPAI Response:

Wi-Fi offloading between ISPs should be explicitly permitted. It should be left to forbearance and individual contracting for the present and reviewed in future.
