

To,

Date:05-09-2024

Mr. Amit Sharma

Advisor(Fin. & Economic Analysis )

TRAI, New Delhi.

Subject :- Comments on Draft The Telecommunication Tariff order @024 for PDO(Pm-WANI).

Dear Sir,

Thanks for given us these opportunities, in continuation of Comments on The Draft Telecommunication Tariff. Our gentle comments are following –

1) Tariff for PM-WANI scheme-

I think there is no need of define Tariff required for PDOs because this is depends on Business conditions.

Our opinion for PM-WANI framework is, there is three partners

I – PDOA, II – PDO, III- ISPs(Internet provider) .

Revenue must be distributed among these 3 stake holders.

For Example-

PDOA get- 10% of wifi data sale business.

PDO get- 50% of wifi data sale business.

ISP get- 40% of wifi data sale business.

*Note- we are running successfully this revenue sharing model for 2 years.*

Benefit of this revenue sharing model-

- a- ISPs are easily ready to provide Inter link to PDO.
- b- Also provide maintenance, Technical support and maintain quality of Internet speed as per demand by PDO/ wifi AP.
- c- Because more DATA CONSUMPTION more business for ISP.
- d- ISPs are also promote PDOs in his services area.
- e- ISP will try to connect unconnected area and provide Bandwidth to PDO.

2) No need of notifying tariff for PDOs.

3) Any PDOA can use his/shared cloud base WiFi Controller software, Centralized Authentication process, Centralized Payment gateways and maintain/record Logs for 2 year as per DoT guidelines, No need of any third party App to Search/ connect WiFi. PDOA who have this facility, C-DoT must be authorized his software.

4) Promote made-in-India Access Points in PM-WANI framework but also permitted use of Imported Access Point(non Chinese product ).

- 5) No need of App because through App to connect wi-fi is complicated process and no user friendly also no any Income for App providers.
- 6) Central registry register PDOA and solve if any dispute rise between PDO&PDOA .
- 7) In present scenario of WiFi business no need of roaming facility among PDOAs because WiFi user buy wifi service for short time like 1-hour, 1-day, 3-days,7-days or max to 1 month only, So no need roaming facilities.
- 8) As per our practical experiences of running public paid Wi-Fi Hotspot services in Indian geography situation, average revenue generate by a Single AP is approx Rs- 1,000/- to 3,000/- monthly . To boost wifi penetration provides some subsidy on AP purchase to PDO.
- 9) Provide some financial incentive to PDOA on DATA utilization basics.
- 10) I am running 3 paid Hotspot Zone with 8 APs, are DATA consumption more then 100Gb/daily. In our opinions TSP are increased his tariff plans so this data consumption going high.

I think if my suggestion helps you in any way, I will be happy.

Regards

Vimal Yash Sahwal (PDOA).

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