

TCL Response to TRAI Consultation Note on Nation-wide Interoperable and 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?

TCL Response: Yes, the architecture seems to be in the right direction that will enable nationwide authentication and payment interoperability for users. Secure authentication of users is the key here. Security on the hotspot provider side is also critical, as malicious users/hackers may be able to duplicate/spoof a Wi-Fi network and pose as a provider of Wi-Fi hotspot. The current architecture does not cover the security details which needs to be looked into in detail while freezing any architecture.

Q2. Would you like to suggest any alternate model?

TCL Response: We do not have suggestion for any alternative model..

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?

TCL Response: Reselling of bandwidth and capacity to retail users is an activity covered under Section 4 of the Indian Telegraph Act hence Public Wi-Fi Access providers can resell provided they have requisite ISP license or UL-VNO-ISP License which are low cost license in the present UL regime. Re-selling of bandwidth and capacity being licensed activity we do not recommend that the “light touch regulation” method such as registration should be allowed for Wi-Fi access providers.

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

TCL Response: For un-bundling Wi-Fi at access and backhaul level, there should be a level playing field between ISPs and Wi-Fi hotspot providers. Hotspot providers providing free access to public internet over W-Fi hotspots can do so only if they are meeting all necessary security compliances that all ISPs are meeting today. This should be irrespective of the nature of core business of the Wi-Fi hotspot provider. Hotspot providers who are providing public internet access through Wi-Fi hotspots on a commercial basis to users, should do so only if they are ISP license holders or their franchisees and level playing field between ISPs and such Wi Fi access providers must be maintained.

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

TCL Response: As suggested above in response to Q3 & Q4.

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?

TCL Response: The cost and revenue sharing among various parties in the ecosystem should be left to the market forces and should be forborne.
