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Date: Sat, 06 Jun 2026 15:36:04 +0530
Subject: FICCI Recommendations on the TRAI Consultation Paper on "Proliferation of Public Wi Fi Networks in India""

===== Forwarded message =====

Dr. Abdul Kayum
Advisor (BB&PA)
Telecom Regulatory Authority of India
Government of India

Dear Sir,

At the outset, FICCI would like to thank TRAI for the opportunity to submit its recommendations on the Consultation Paper concerning the proliferation of Public Wi Fi Networks in India.

India's digital connectivity ecosystem has evolved significantly over the past decade, primarily driven by the rapid expansion of mobile broadband infrastructure and affordable data services. Today, licensed telecom networks form the backbone of internet access across the country, enabling scalable, secure, and continuous connectivity for millions of users. The success of this model reflects strong consumer preference for seamless mobile broadband services that do not require repeated authentication or dependence on shared access infrastructure.

While public Wi Fi has been envisaged as a complementary and low-cost connectivity solution, its adoption trajectory has remained relatively limited despite enabling reforms such as PM WANI. Industry experience indicates that challenges, including commercial viability challenges in achieving scale under current market conditions of Public Wi-Fi deployments, lack of fiberization, fragmented coverage, inconsistent service quality, cumbersome access procedures, RoW implementation challenges and concerns relating to cybersecurity and data privacy, continue to constrain large-scale consumer adoption. These trends suggest that the issue is not necessarily one of regulatory facilitation, but rather one linked to underlying supply constraints, market demand and long-term commercial sustainability.

FICCI respectfully submits that any policy approach should be aimed at expanding overall broadband infrastructure. Accelerating deployment primarily through subsidies, mandatory obligations, or cross-funding arrangements may create models that are dependent on continued external support and may not remain viable in the long run. Any support mechanism should be technology-neutral and aimed at strengthening the broader connectivity ecosystem.

In this context, the role of the Government may be more impactful when focused on strengthening foundational digital infrastructure that benefits the overall broadband ecosystem. Measures such as reducing backhaul spectrum costs and streamlining Right of Way approvals would create a stronger and more inclusive connectivity ecosystem.

FICCI also wishes to highlight the important role of State Governments and local bodies in enabling efficient infrastructure deployment. Challenges relating to non-uniform right-of-way frameworks, excessive municipal levies, and multi-layer approval processes continue to affect rollout timelines and investment efficiency across the sector. A harmonised, transparent, and non-discriminatory framework for access to public infrastructure assets such as poles, street furniture, and transport infrastructure would significantly improve ease of deployment for all service providers.

Further, the telecom sector continues to operate under considerable financial obligations while simultaneously delivering some of the world's most affordable data services. Addressing structural concerns such as high levies, expensive backhaul costs, and regulatory compliance burdens would create greater flexibility for operators to invest in network expansion and service quality improvements.

FICCI also recommends that the evolution of public Wi Fi ecosystems, including authentication frameworks and interoperability standards, should primarily be guided through industry collaboration and

globally accepted best practices. Highly prescriptive regulatory approaches, including mandated architectural models, may limit innovation and may not align with evolving consumer usage patterns in India. A flexible and innovation-friendly regulatory environment would allow industry stakeholders to adopt deployment models best suited to local demand and technological evolution.

Along the same lines, FICCI believes that India's connectivity growth should continue to be guided by principles of market efficiency and sustainable investment. Strengthening the underlying digital infrastructure ecosystem will ensure long-term expansion of reliable and affordable connectivity across the country.

We would be pleased to engage further with TRAI and provide any additional inputs or clarifications, if required.

Warm regards,



Sarika Gulyani

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