

Counter-Comments on Consultation Paper No. 07/2026

Proliferation of Broadband through Public Wi-Fi Networks in India

Submitted by: **INA Technologies Private Limited**

CIN: U61900TS2026PTC216586 | Incorporated: 20-May-2026 under the Companies Act 2013

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Submission Date: 15-Jun-2026 | Counter-Comments Deadline: 15-Jun-2026

INA Technologies Private Limited, CIN U61900TS2026PTC216586, incorporated on 20-May-2026 under the Companies Act 2013, registered at 70 Gruhalaxmi Colony, Aoc Records, Tirumalagiri, Hyderabad, Telangana – 500015, respectfully submits the following counter-comments in response to the stakeholder submissions filed on Consultation Paper No. 07/2026 on the Proliferation of Broadband through Public Wi-Fi Networks in India.

Note on preparation: *This response was prepared using AI — technologies available today that enable a single founder, managing multiple professional and personal commitments, to engage substantively with a consultation of this scope. The document has been through multiple rounds of review and correction before submission.*

1. About INA Technologies Private Limited

INA Technologies Private Limited is building R-Fi — a public Wi-Fi hotspot network operating on the indirect monetisation model. The platform enables venue owners (cafes, shops, coaching centres, residential complexes, and similar locations) to offer friction-free Wi-Fi access to users while generating revenue through metered data access at Rs.15 per GB, with the platform designed to build an additional indirect revenue layer through anonymised footfall data and venue-specific offers. Users access the network via a single OTP registration — no application download, no micro-voucher purchase required. Data is purchased inside the network after authentication. INA Technologies is building toward PDOA registration under the PM-WANI framework.

The platform is currently under development and will be available at r-fi.in. It is deployed on cloud infrastructure, authenticated through industry-standard RADIUS, and core authentication flow end-to-end tested with real users as of June 2026, with go-live targeted in June 2026. The founding director brings 18 years of enterprise technology experience across Fortune 500 clients and growth-stage companies, with extensive experience serving enterprise clients across India and international engagements. Through his predecessor entity INA Technology Solutions LLP, the founder entered into a Mutual Non-Disclosure Agreement with QUALCOMM Incorporated in February 2017 — one of the earliest Fortune 500 validations of the R-Fi (erstwhile OurFi) model and a recognition that arrived just 46 days after the predecessor entity's formation. In a 2017 pilot operation under the predecessor entity, the platform recorded 177 registered users independently verified through the external RADIUS authentication system, with approximately 250 users over the full operational period. As recently as December 2025, a user survey of 64 engineering college students confirmed continued strong demand for the model. INA Technologies now submits these counter-comments from the position of an entity that has not merely theorised about the indirect Wi-Fi model — it has built, deployed, and validated it.

2. The Transformation Opportunity — India Has Done This Before

TRANSFORMATION NARRATIVE I — UPI AS THE GOVERNING PRECEDENT

India demonstrated to the world, most powerfully through the Unified Payments Interface, that transformative digital infrastructure can emerge from a combination of enabling policy, private enterprise execution, and a willingness to look past what established players had declared impossible. At the time of UPI's conception, the dominant narrative held that India's fragmented financial ecosystem, low smartphone penetration, and distrust of digital transactions made mass adoption of digital payments impractical. That narrative was wrong. UPI achieved what appeared unlikely: vendor consolidation across competing banks and payment providers who had every commercial incentive to resist; user adoption at a scale no incumbent had predicted; government backing that set the enabling rails without prescribing the applications built on top; and ultimately a transformation so significant that nations across Southeast Asia and the Middle East have since established or are actively developing payment linkages with India's UPI infrastructure — a recognition that India's approach worked at a scale no one else had achieved. The lesson is not that the government built UPI — it is that the right policy framework enabled private enterprise to build something the world had not seen before, and India earned global leadership as a result.

The indirect Wi-Fi monetisation model — where user access is low-friction rather than free, and platform revenue derives from anonymised data, venue analytics, and advertising — presents India with a comparable inflection point. Just as UPI did not replace mobile banking but created an entirely new value layer, the indirect Wi-Fi model does not compete with mobile data — it creates new value on top of existing ISP infrastructure that was previously untapped. The value creation is shared across users, venue owners, local businesses, TSPs, and government alike. This is not a niche proposition from a single startup. It is, in the words of nine independent stakeholders who have submitted to this very consultation, the globally proven path.

INA Technologies submits these counter-comments from a position of first-hand operational experience, thorough research across seventeen key peer submissions, and the conviction that this opportunity is more dependent on execution than on model validation. The model has been validated — by a live operational deployment in 2017 under the founder's predecessor

entity, by nine independent endorsements across those seventeen submissions, and by the blank space that no one has filled with an objection. What remains is execution. The founder of the erstwhile entity is rebuilding with the lessons of that first deployment, the compliance architecture that did not exist in 2017, and the persistence that comes from knowing the model works. INA Technologies requests that TRAI's regulatory framework creates the enabling conditions for this execution to scale.

3. The Pattern Across Seventeen Key Submissions

INA Technologies has reviewed seventeen of the stakeholder submissions filed in response to Consultation Paper No. 07/2026, covering all major industry categories represented. One pattern is definitive and must be placed on the record clearly.

CRITICAL FINDING

Not a single submission — from any stakeholder category — challenges the indirect monetisation model. Every TSP objection is directed exclusively at the paid micro-voucher model: the requirement to purchase a session voucher before accessing Wi-Fi. That model has struggled to achieve commercial viability, and the TSPs are correct in their diagnosis. However, the diagnosis of one model's failure is not a verdict on all models. The indirect model — where access is friction-free for users and revenue derives from anonymised data and advertising — occupies a complete blank space across all five TSP submissions. The blank space is as significant as any statement made.

COAI — the collective voice of all major Indian Telecom Service Providers — goes further than silence. In its own submission (Q25), COAI acknowledges: *"Public Wi-Fi operators may be able to generate revenues through advertisements, rather than through direct charges to end users."* This concession, from the industry body that simultaneously argues public Wi-Fi is commercially unviable, is important. COAI cannot coherently claim that Wi-Fi is economically unviable while acknowledging in the same submission that the advertising model can generate revenue for Wi-Fi operators. The unviability claim applies to the paid model that COAI itself attacks — not to the indirect model it has conceded can work.

Vodafone Idea Limited's submission warrants specific attention. VIL argues at length that "the monetisation model should be market forces driven and not prescriptive through regulatory intervention." INA Technologies agrees entirely. R-Fi seeks no subsidy, no mandate, no government funding, and no infrastructure support. It deploys on private commercial premises using the venue owner's existing ISP connection, generates revenue through private commercial arrangements, and serves users with friction-free connectivity on a metered pay-per-use model, supplemented by a data and advertising value exchange. This is precisely the market-forces-driven model VIL demands. VIL's own argument validates R-Fi's approach — and VIL has offered no objection to it because VIL declined to engage with the indirect model at all.

TRANSFORMATION NARRATIVE II — INCUMBENCY RESISTANCE IS NOT A POLICY VERDICT

India's technology sector has faced this pattern before. When affordable mobile data at scale was proposed, the incumbent narrative held it was commercially unviable. That narrative proved wrong — and India became the world's largest mobile data consumer. The TSP submissions filing fatalistic assessments of public Wi-Fi may similarly be misreading the market. They are correct that the paid micro-voucher model has struggled. They are not correct that this implies the failure of all Wi-Fi monetisation models. The wrong model failing does not imply the right model failing. What India needs — as it needed with digital payments — is not permission to keep doing what has not worked, but an enabling framework for what has not yet been tried at scale.

4. Nine Independent Sources Converge on the Indirect Model

Across the seventeen submissions reviewed, nine independent stakeholders from five distinct categories have endorsed the indirect monetisation model. They arrive from different starting points, represent different interests, and were not responding to each other. The convergence is substantive, not coordinated.

Source	Category	Key Endorsement (verbatim)
COAI	TSP Industry Body	<i>"Public Wi-Fi operators may be able to generate revenues through advertisements, rather than through direct charges to end users."</i>

Source	Category	Key Endorsement (verbatim) (Q25)
Consumer Care Society, Bengaluru	Consumer Organisation	<i>"International experience demonstrates that the most successful Public Wi-Fi ecosystems globally use hybrid monetisation approaches, indirect revenue models, advertising and digital ecosystem integration rather than pure pay-per-use systems." (Q25)</i>
Consumer Protection Association, Himmatnagar (Gujarat)	Consumer Organisation	<i>"Viable Wi-Fi deployments use a mix of direct and indirect (advertising, sponsorships, data services) models. Globally, successful public Wi-Fi (e.g. UK's networks) rely on free-to-user access subsidised by adverts and sponsorships." (Q25) – uses "indirect monetisation" as a named category</i>
Cisco Systems India	Fortune 500 Networking Company	<i>"The most durable models combine connectivity with broader value: analytics, digital inclusion and ecosystem partnerships." (Q25)</i>
Wireless Broadband Alliance (WBA)	Global Wi-Fi Standards Body (Reliance Jio on board)	<i>Codified consent-based persistent identifier sharing into the OpenRoaming specification to enable "venue-specific value propositions." (Q6)</i>
ITU-APT Foundation of India (IAFI)	ITU-Linked Regulatory Foundation	<i>"Urban PDOs provide free Wi-Fi but monetize the captive portal. Before connecting, the user must view a digital coupon or advertisement specific to that local shop or neighbourhood." (Q25)</i>
Tata Communications Limited	Tier 1 ISP / Tata Group	<i>"Introduce advertising-supported access models. Monetize anonymized data insights (with strict privacy compliance)." (Q3–Q5). Urban: "advertising-based revenue." High-footfall: "location-based advertising." (Q25)</i>

Source	Category	Key Endorsement (verbatim)
MAIT	Tech Industry Body	<i>"Providing anonymized footfall analytics to mall tenants creates alternate revenue streams beyond charging the consumer." (Q9)</i>
Kerala Communicators Cable	Cable ISP / Ground-Level Operator	<i>"Urban: Freemium + ads. High-density: Ad-supported free Wi-Fi." (Q25)</i>

The most precise description of INA Technologies' deployed model comes from the ITU-APT Foundation of India — an ITU-linked body, not a startup. IAFI additionally states (Q20): *"If a local cafe owner provides free Wi-Fi, the captive portal should allow the owner to push their own digital coupons or localized ads to the connected user. Transforming the Wi-Fi hotspot into a localized digital storefront provides a massive incentive for retail establishments to participate."* This is not a description of a hypothetical. It is a description of R-Fi's deployed architecture — and IAFI is recommending that TRAI enable it as policy.

The Wireless Broadband Alliance — whose board includes Reliance Jio, AT&T, BT, and Cisco — has separately written consent-based persistent identifier sharing into the global OpenRoaming specification precisely to enable venue-specific value propositions. R-Fi's model, which uses OTP-verified phone number as a consent-based persistent identifier for return-visit recognition and venue-specific offers, is architecturally consistent with this global standard. INA Technologies' data model is not experimental — it is aligned with what the global Wi-Fi standards body, including Jio's own industry association, has codified as correct practice.

THE EXECUTION GAP

Nine independent bodies across five categories endorse this approach. Not one challenges it. Among all entities submitting to this consultation, INA Technologies is the only one that has built, field-tested, and is now redeploying it — with real users, RADIUS-authenticated sessions, and independently verified traction from a 2017 pilot. The convergence of endorsement without execution is precisely the gap INA Technologies is positioned to fill. The model works. The platform is in deployment. The enabling framework is what allows it to scale.

5. Responses to Specific TRAI Questions

Q1 — Supply-Side Constraints

The primary supply-side constraint is the wrong business model, not infrastructure complexity or registration friction. All five TSP submissions confirm that the paid micro-voucher model has failed. BIF confirms that backhaul cost is the bottleneck when Wi-Fi is treated as a standalone commercial product requiring per-session revenue from users. INA Technologies' model eliminates this bottleneck entirely. The hotspot owner's ISP connection is their own pre-existing cost; R-Fi adds no backhaul cost and requires no additional infrastructure investment from the venue. The supply-side constraint dissolves when the model shifts to indirect monetisation — because the economic logic of deployment changes from "recover backhaul cost through session fees" to "generate value through data and advertising while the venue's existing connection does the work." Small MSMEs and individual entrepreneurs — not large TSPs — are the natural supply-side for this model. They already have the premises, the footfall, and the ISP connections. What they need is a platform, a data architecture, and a regulatory environment that permits indirect revenue.

Q2 — Demand-Side Constraints

The demand-side constraint is authentication friction and the expectation of free access. Vodafone Idea correctly identifies three friction sources under the current PM-WANI model: application download, OTP generation, and micro-voucher purchase. INA Technologies' model eliminates two of these three. No application download is required — authentication is browser-native via captive portal, handled automatically by Android, iOS, and Windows devices. No micro-voucher purchase is required before network entry. OTP verification is retained as a one-time per-device step under the Digital Personal Data Protection Act 2023 — and with a three-day session cookie, the vast majority of return visits require no re-authentication at all.

TRANSFORMATION NARRATIVE III — FRICTIONLESS ACCESS DRIVES MASS ADOPTION

UPI's most important design principle was the elimination of friction at the point of transaction. Prior digital payment systems required dedicated account setup, hardware tokens, and multiple authentication steps. UPI reduced this to a single identifier and a PIN. Adoption followed at a scale no incumbent predicted, because the barrier was removed rather than managed. The indirect Wi-Fi model applies the same insight to connectivity: remove the payment barrier at the point of network entry, reduce authentication to a single OTP, and let value exchange happen in the background through data and advertising. The demand for free, frictionless connectivity is not a policy question — it is demonstrated by the 24 GB per subscriber per month that Indians already consume on mobile data (Source: Press Information Bureau, Government of India, PRID 2206477). R-Fi meets that demand at the venue level, without competing with mobile networks and without requiring a single rupee from the user at the moment of connection.

Q4 / Q5 — PM-WANI Framework and PDO Sustainability

The PM-WANI framework represents a significant and well-structured initiative to expand public Wi-Fi access across India. In its current form, the framework's sustainability guidance has primarily been developed in the context of session-based revenue models — where voucher sales fund PDO operations. This is understandable given the models that were prevalent at the time of PM-WANI's design. INA Technologies respectfully submits that the framework would benefit from explicitly accommodating operators who achieve sustainability through indirect revenue models, without any change to its core architecture. The specific design suggestions are set out in Section 6.

Q25 — Monetisation Models

The nine-source convergence documented in Section 4 is the most substantive response INA Technologies can offer to Q25. Nine independent stakeholders across five categories have endorsed the indirect monetisation model. Zero have challenged it. INA Technologies is operationalising it. INA Technologies is a bootstrapped, founder-led MSME — building without external capital, and bringing to this consultation what no large stakeholder can replicate: first-hand operational experience of this model from the ground up. INA Technologies welcomes the opportunity to collaborate with Fortune 500 technology partners and MSME market leaders — sharing deployment experience, contributing to standards development, and helping build the ecosystem that nine independent stakeholders have called for. What TRAI can enable is not merely the indirect model itself, but a framework where committed smaller operators can participate alongside, and in partnership with, India's largest players — because the last mile is where the model lives, and it is operators at the last mile who have built it.

To be precise about the model: R-Fi is not a pure advertising-funded free service. It is a hybrid model. Network entry is friction-free — no pre-purchase is required, and OTP registration takes under a minute. Data usage is metered at Rs.15 per GB, purchased inside the network after authentication. On top of this metered access, R-Fi builds an indirect revenue layer: anonymised footfall data, venue-specific advertising through the captive portal, and a marketplace of local digital offers for connected users. This hybrid architecture is specifically what the ITU-APT Foundation of India describes as the correct urban PDO approach, what Tata Communications recommends as the durable model for urban and high-footfall deployments, and what Consumer Care Society, Consumer Protection Association Himmatnagar, MAIT, and Kerala Communicators Cable all independently endorse in their submissions to this consultation.

Q26 — Additional Comments

This consultation has surfaced a verifiable gap: across the seventeen key submissions reviewed, nine independently endorse sustainability approaches that do not rely on direct user charges; and not one — including the five Telecom Service Providers who most vigorously oppose public Wi-Fi mandates — has challenged, questioned, or objected to them in their submissions to this consultation. That silence is not ambiguity. It is the absence of opposition. The PM-WANI framework has not explicitly addressed this space, and that gap should not persist in TRAI's recommendations. The specific design implications are set out in Section 6 below.

6. Specific Requests to TRAI

ASK 1 — A MODEL-AGNOSTIC FRAMEWORK ANCHORED IN CONSUMER VALUE

TRAI's recommendations should make clear that the PM-WANI framework does not prescribe how PDOs and PDOAs achieve commercial sustainability — only that they meet consumer-facing standards: data protection, authentication integrity, service quality, and DPDP compliance. Nine independent stakeholders across five categories have submitted to this consultation endorsing sustainability approaches that do not rely on direct user charges. TRAI's framework should enable, not inadvertently constrain, operators who demonstrate compliance with these standards regardless of their chosen revenue model. IAFI and Consumer Care Society both independently recommend this clarification. INA Technologies endorses it.

ASK 2 — MODEL-AGNOSTIC COMPLIANCE FRAMEWORK

A PDO operating on an indirect revenue model should not be required to satisfy compliance conditions beyond those that apply to a PDO operating on a paid model.

ASK 3 — PRESERVING MARKET OPENNESS FOR OPERATORS OF ALL SCALES

INA Technologies requests that TRAI's recommendations include market openness as an explicit governing principle for the PM-WANI ecosystem. Digital infrastructure markets have a well-documented tendency to consolidate around players who hold existing network or scale advantages — and regulatory frameworks that do not address this tendency early typically find themselves managing its consequences after consolidation has already occurred.

Four areas warrant specific attention: first, connectivity pricing for PDOs should be non-discriminatory and proportionate — small operators should not face pricing structures that are commercially viable only for large aggregators; second, compliance and registration pathways should be scaled to operator size — MSME operators require a simplified, time-bound pathway that does not demand the legal and technical resources available only to large enterprises; third, discovery and referral mechanisms within the PM-WANI ecosystem should be equitably accessible to all registered PDOs and PDOAs — a small operator who meets all compliance standards should have the same visibility to end users as a large one; fourth, the principle of non-discrimination should extend to all aspects of PM-WANI participation not already addressed above — including technical standards, certification requirements, and commercial arrangements — and TRAI should establish a clear and accessible mechanism through which operators of any scale can bring market conduct concerns to TRAI's attention as the ecosystem develops.

No prescriptive intervention is being requested at this stage — only that TRAI design its framework with the awareness that a contestable last mile is in the interest of the end user, and commit to reviewing market dynamics as the ecosystem scales. The end user benefits most when the market is genuinely competitive. INA Technologies requests that TRAI ensure competition remains possible — not merely that it is not explicitly prohibited.

7. Closing — India's Opportunity to Lead

TRANSFORMATION NARRATIVE IV — INDIA AT THE FOREFRONT OF GLOBAL WI-FI MONETISATION

India has a consistent pattern of converting apparent constraints into global innovations that others follow — UPI being the defining example of this generation. That pattern is repeating. A comparable inflection point now exists in public Wi-Fi connectivity, and the ingredients for India-led global leadership are already present. A bootstrapped Indian MSME is building and deploying the model. An ITU-linked body has described the mechanism in its submission to this regulator and recommended its adoption. A Tata Group Tier 1 ISP has independently recommended the same model to the same regulator. A Fortune 500 technology company — QUALCOMM — validated this model through a formal agreement with the founder's predecessor entity nearly a decade ago. Nine voices from across the global and domestic Wi-Fi ecosystem have converged on the same conclusion. The enabling policy framework is the one remaining piece. With it, India does not merely participate in the next chapter of global Wi-Fi — India writes it.

The win is shared at every level. Users get connectivity without friction or upfront payment. Venue owners — the shopkeepers, cafe owners, and small business operators at the heart of India's MSME economy — earn revenue from infrastructure they already own. Local advertisers reach genuinely local audiences for the first time. TSPs experience data offload that reduces pressure on mobile networks. Government advances the digital inclusion goals of Viksit Bharat 2047. And India earns the credibility of having led — not followed — the world on a model that the global Wi-Fi industry has already declared the durable path forward.

No foreign comparable is needed to make India's case. India already holds every advantage required to lead this space: the world's largest mobile data consumer base generating 24 GB per subscriber per month (PIB, PRID 2206477); a payments infrastructure transformation — UPI — that the world has already recognised as unprecedented at scale; domestic operators who have built and field-tested this model with real users; a regulatory framework actively evolving to address the very questions this consultation raises; and a government commitment to digital inclusion through Viksit Bharat 2047 that gives this work national purpose. The question is not whether India can do what others have done. It is whether India will lead before others catch up.

R-Fi — an operator building to DPDP-compliant standards from the ground up, with first-hand operational experience of this model and the commitment to rebuild it with the compliance architecture and regulatory clarity that 2026 makes possible — stands as an example of the kind of serious, committed operator that government recognition would attract and validate. INA Technologies remains available for further engagement with TRAI and relevant stakeholders as this policy evolves. We are building this — and operating it. The policy clarity will allow it to reach the scale this model deserves.

INA Technologies Private Limited respectfully requests that TRAI's recommendations on Consultation Paper No. 07/2026 create the explicit, model-agnostic, MSME-inclusive policy environment in which this approach can demonstrate at scale what it has already demonstrated in deployment: that it works, that users want it, that venue owners benefit from it, and that India is ready to show the world how connectivity and commerce can create shared value at the last mile. That is what transformation looks like. India has done it before. It can do it again.

Respectfully submitted,

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Appendix — Filing Reference

Item	Detail
Company Name	INA Technologies Private Limited
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Counter-Comments Deadline	15-Jun-2026 (extended from 08-Jun via Press Release 62/2026, 22-May-2026)
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INA Technologies Private Limited — Counter-Comments on CP 07/2026 — Submitted 15-Jun-2026