

**Tata Communications Ltd.'s Counter Comments on  
TRAI Consultation paper on “Proliferation of Public Wi-Fi Networks in India”**

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At the outset, we thank the Authority for providing us the opportunity to submit our counter comments on the TRAI Consultation paper on “Proliferation of Public Wi-Fi Networks in India”. We appreciate TRAI’s continued efforts to foster digital inclusion, enhance broadband access, and enable innovative frameworks that support the expansion of public Wi-Fi infrastructure across the country.

Tata Communications, as an ISP focused on enterprise connectivity and internet backbone services, plays a critical role in enabling backhaul for Public Wi-Fi under the PM-WANI framework, which is driven by PDOs and PDOAs. While we are committed to supporting a scalable, secure, and inclusive public Wi-Fi ecosystem aligned with Digital India objectives, it is important that regulatory measures maintain a level playing field. Given the varied market dynamics—where some TSPs/ISPs operate in retail broadband and PDOs procure bandwidth based on business needs—any policy intervention should avoid market distortion or unintended competitive advantage. Our submissions made to TRAI aim to balance innovation, investment, and consumer interest while ensuring operational viability and sustainable ecosystem growth on the premise that the proliferation of Public Wi-Fi networks in India is critical to advancing broadband penetration, improving data affordability, and supporting the Digital India vision.

Tata Communications counter comments are as below:

1. Some stakeholders have pointed out that since India is predominantly a mobile-first internet ecosystem, it eliminates the need to rely on public Wi-Fi networks. We strongly object to it as it is high time that equal importance is given to all foundational pillars of digital infrastructure including Public Wi-Fi. In India, connectivity is not a commodity, it is a tool of empowerment and nation building. Public Wi-Fi can play a critical role in bridging the digital divide, particularly in underserved and rural areas, while complementing existing mobile and fixed broadband networks. India has a strong business case for Public Wi-Fi even in a mobile-first, ultra-low-tariff market provided right policy and regulatory impetus is provided.
2. Some stakeholders have suggested that Telecom service providers are currently operating under significant fiscal and regulatory pressures, even as they deliver some of the lowest mobile data tariffs globally. Imposing additional obligations—such as supporting public Wi-Fi deployments or cross-subsidising PM-WANI (Wi-Fi Access Network Interface) through licensed services—would be both inequitable and financially unsustainable. We strongly support a hybrid approach with primary reliance on a model where the Government focuses on ensuring robust and affordable backhaul infrastructure and intervenes in hotspot deployment only in cases of market failure would be more appropriate for the sustainable proliferation of Public Wi-Fi networks. Introducing regulatory treatment that favours public Wi-Fi will not discourage investment in licensed networks or weaken the reliability and resilience of the broader connectivity ecosystem. In fact, Public Wi-Fi should be perceived as an attractive and complementary connectivity option instead of a competition to mobile services.

3. It is unsuitable to project that in areas with robust 4G and 5G coverage, the additional value of subsidised public Wi-Fi remains limited, as consumers already benefit from affordable, high-quality mobile data services. TRAI itself has highlighted in the Consultation Paper that the broadband is no longer merely a telecom service but foundational national infrastructure supporting digital governance, AI, cloud computing, digital commerce, education, telemedicine, IoT systems and enterprise digitisation. The CP further recognises that India's digital economy growth now depends upon deeper broadband usage and not merely basic internet access.
  
4. In the end, we respectfully request TRAI to kindly take up with Government to prioritise and expedite the decision-making process for the acceptance of the TRAI's forward looking and balanced recommendations dated 10-12-2025 pertaining to the assignment and utilisation of microwave backhaul spectrum and E&V Bands. This will establish an equitable and technology-neutral backhaul spectrum framework supporting diverse backhaul needs of all authorised entities.