

BIF's Counter Comments on the Position that Public Wi-Fi Has Limited Relevance in India

Public Wi-Fi is a Complementary Broadband Infrastructure Layer.

The submissions of certain stakeholders proceed from the premise that India's low mobile data tariffs and extensive mobile broadband coverage have largely eliminated the need for Public Wi-Fi. While India's success in delivering affordable mobile broadband is undeniable and commendable, this conclusion does not fully reflect the broader role that Public Wi-Fi can play within a modern broadband ecosystem.

Public Wi-Fi is Not Intended to Replace Mobile Broadband.

The PM-WANI framework was never conceived as a substitute for mobile broadband networks. Rather, it was designed as a complementary broadband access layer that operates alongside mobile and fixed broadband infrastructure.

Globally, mature broadband ecosystems combine licensed mobile networks, fixed broadband infrastructure and Wi-Fi access networks. These technologies perform different but complementary functions and are not mutually exclusive. The existence of affordable mobile broadband has not prevented countries with advanced digital economies from simultaneously investing in extensive Wi-Fi ecosystems.

The relevant policy question is therefore not whether mobile broadband exists, but whether India's future broadband requirements can be most efficiently met through a combination of access technologies.

The Relevant Market is Not Limited to the Unconnected Population.

The value proposition of Public Wi-Fi extends beyond citizens who currently lack internet access.

India remains predominantly a mobile-first economy with relatively low fixed broadband penetration compared to leading digital economies. A large proportion of Indian households rely exclusively on mobile connectivity and therefore do not benefit from the higher-capacity, shared-access and lower-cost characteristics typically associated with fixed broadband environments.

Public Wi-Fi provides an important mechanism through which broadband capacity can be extended into communities, institutions, public spaces and shared environments without requiring every individual user to maintain a separate fixed broadband subscription.

Public Wi-Fi Improves National Broadband Efficiency.

Mobile broadband and Public Wi-Fi utilise fundamentally different network resources.

Mobile networks rely on scarce licensed spectrum and require continuous investments in radio access infrastructure to accommodate rising traffic demand. Public Wi-Fi, by contrast, leverages fixed broadband infrastructure and unlicensed spectrum to distribute traffic closer to end users.

International experience demonstrates that Wi-Fi plays a critical role in carrying broadband traffic in homes, enterprises, campuses, transportation hubs and public venues. Public Wi-Fi therefore complements rather than competes with mobile broadband by improving overall

network efficiency, reducing congestion and enhancing user experience in high-density and indoor environments.

The long-term policy objective should be to optimise national broadband capacity rather than maximise traffic on any single access technology.

Public Wi-Fi Supports the Efficient Utilisation of Existing National Infrastructure.

India has made substantial investments in digital infrastructure, including BharatNet, fibre networks, public institutions and community broadband assets.

PM-WANI provides a mechanism through which these investments can be utilised more effectively by extending broadband access to surrounding communities and public spaces.

From a public policy perspective, improving utilisation of existing infrastructure often represents a more efficient outcome than duplicating infrastructure or relying exclusively on one access technology.

Public Wi-Fi Delivers Broader Social and Economic Benefits.

Public Wi-Fi supports a range of use cases that extend beyond individual data consumption. These include:

- educational access,
- digital public services,
- telemedicine,
- e-governance,
- community connectivity,
- public institution connectivity,
- digital entrepreneurship,
- tourism and public venues,
- shared access in underserved areas.

The economic and social benefits associated with these outcomes cannot be evaluated solely through comparisons of retail mobile data tariffs.

Public Wi-Fi and Digital Bharat Nidhi Objectives.

The objective of Digital Bharat Nidhi is to support the expansion of digital connectivity and promote inclusive access to communications infrastructure, particularly where market forces alone may not fully address national development objectives.

PM-WANI is entirely consistent with these objectives. Any support provided through Digital Bharat Nidhi would not be intended to distort competition, but rather to accelerate digital inclusion, improve utilisation of existing infrastructure assets and facilitate broadband access in areas or deployment models where commercial incentives may be insufficient.

Such support would be comparable to public investments made globally to promote broadband access, digital inclusion and connectivity infrastructure.

Conclusion.

It is not a choice between mobile broadband and Public Wi-Fi. Both technologies serve important and complementary functions within a modern digital economy.

India's future broadband architecture is likely to benefit from a balanced approach that combines the strengths of licensed mobile networks, fixed broadband infrastructure and Public Wi-Fi platforms such as PM-WANI. The objective should be to maximise national broadband availability, affordability, capacity and efficiency, while enabling citizens, institutions and enterprises to access the most appropriate connectivity option for their needs.