



COAI Response to TRAI Consultation paper on “Proliferation of Public Wi-Fi Networks in India”.

We thank the Authority for providing us the opportunity to respond to the TRAI Consultation paper on “Proliferation of Public Wi-Fi Networks in India”. While the consultation paper is detailed, there are several issues which require attention of the Authority. Notably, driven by the widespread availability of affordable mobile data, the need for public Wi-Fi networks has substantially diminished. Furthermore, mobile data is generally more secure than public Wi-Fi, which is often susceptible to various cyber risks and privacy breaches. As a result, consumers increasingly prefer mobile data over public Wi-Fi for their daily connectivity needs, given the combination of cost-effectiveness, convenience, and enhanced security. Hence, what is not achieved by market forces cannot be achieved by policy intervention. Accordingly, COAI sets out the following submissions.

1. Definition of Public Utility

- a) COAI would like to highlight that the foundation of India’s digital connectivity ecosystem rests on the substantial and sustained investments made by licensed TSPs. In contrast, Public Wi-Fi operates as an overlay access layer, largely dependent on the underlying infrastructure created and maintained by TSPs. Any policy approach that promotes Public Wi-Fi without recognising this structural dependence risks undermining the very foundational layer that enables connectivity and creates a fundamentally unequal regulatory framework.
- b) At the outset we submit that Mobile broadband services delivered by TSPs over licensed spectrum, are not 'less public' or 'less utility-like' than Public Wi-Fi. In fact, the Consultation Paper itself acknowledges in (para 2.88), mobile broadband networks which TSPs have built at enormous cost provide '*seamless, always-on*' connectivity that is precisely the characteristic of a public utility. The overwhelming majority of Indians rely on TSP provided mobile and broadband services, far exceeding the reach of existing Public Wi-Fi networks.
- c) Therefore, if the government is willing to extend fiscal and regulatory support to Public Wi-Fi providers on the basis that communication is a public utility, it must as a matter of fairness and equality extend equivalent or proportionate relief to licensed TSPs, who provide the same utility at a vastly larger scale.
- d) Further in para 2.86 of the Consultation Paper, TRAI has noted that digital connectivity is a public utility and, in that context, has suggested for reduction of RoW charges, rationalisation of electricity tariffs, and streamlined approvals for Wi-Fi hotspot deployment. COAI fully supports these measures but submits that the same

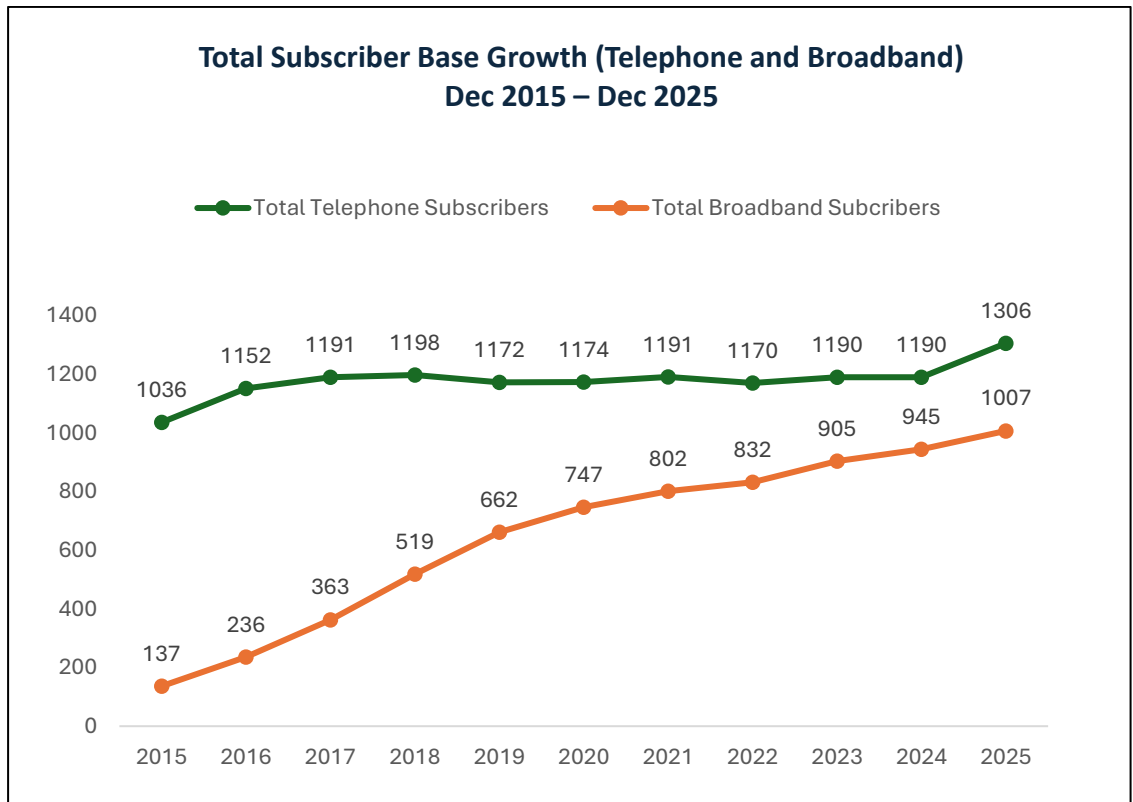


logic must apply to mobile network deployments, cable and fibre laying and all other communication infrastructure of TSPs.

- e) Furthermore, the consultation paper proposes (para 2.111) the use of Digital Bharat Nidhi for funding last-mile connectivity for Public Wi-Fi, a fund to which licensed TSPs have contributed the overwhelming majority of the corpus through mandatory levies. TSPs should, therefore, be primary beneficiaries of DBN deployment and should not be required to fund, through their levies, a competing ecosystem that operates without equivalent obligations.
- f) In light of the above we submit that:
 - i. First, a precise legal and policy definition of 'Public Utility' and the conditions under which a communication service may be classified as such; and
 - ii. Second, if communication is to be recognised as a public utility the very premise driving the proposed proliferation of Public Wi-Fi, such classification must be applied uniformly across all modes of communication and all service providers, without selective or discriminatory application.

2. Contribution of telcos to Connectivity

- a) Besides the above it is also pertinent to keep in mind the contribution of TSPs to enhancing Digital Connectivity in India. This contribution—specifically, the combination of ubiquitous mobile broadband coverage, high data speeds, and data tariffs among the lowest globally has rendered dedicated public Wi-Fi infrastructure functionally redundant.
- b) Telcos have been instrumental in developing the essential digital infrastructure for the spread of internet and broadband throughout India. They have emerged as the cornerstone of the country's digital evolution, working diligently to establish widespread connectivity, even in the most remote regions.
- c) The total broadband subscribers have grown exponentially from 137 million in 2015 to over 1007 million in 2025, indicating the rapid expansion of data networks, increasing digital inclusion and a clear shift towards affordable data-centric services. This exponential growth reflects not only network expansion but also increasing affordability and accessibility of mobile broadband services.

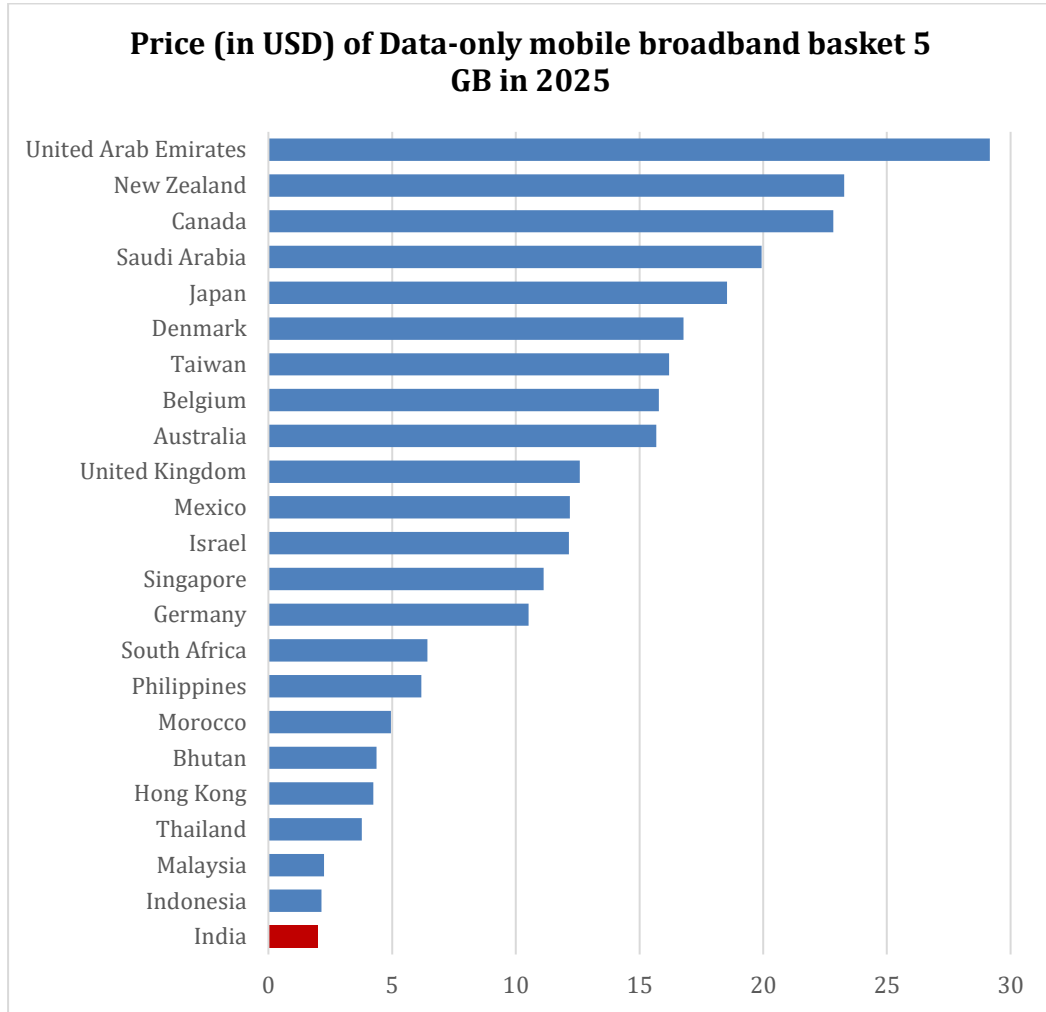


(Source: TRAI Telecom Subscriptions Reports)

This achievement has been enabled by significant private sector investments and the provision of highly affordable telecom services by Indian Telcos.

3. Affordable Broadband /Internet

- a) Access to Broadband/ internet is so easy and affordable in India that Indian consumers pay a fraction of what users pay in most other countries for the same volume of mobile data.

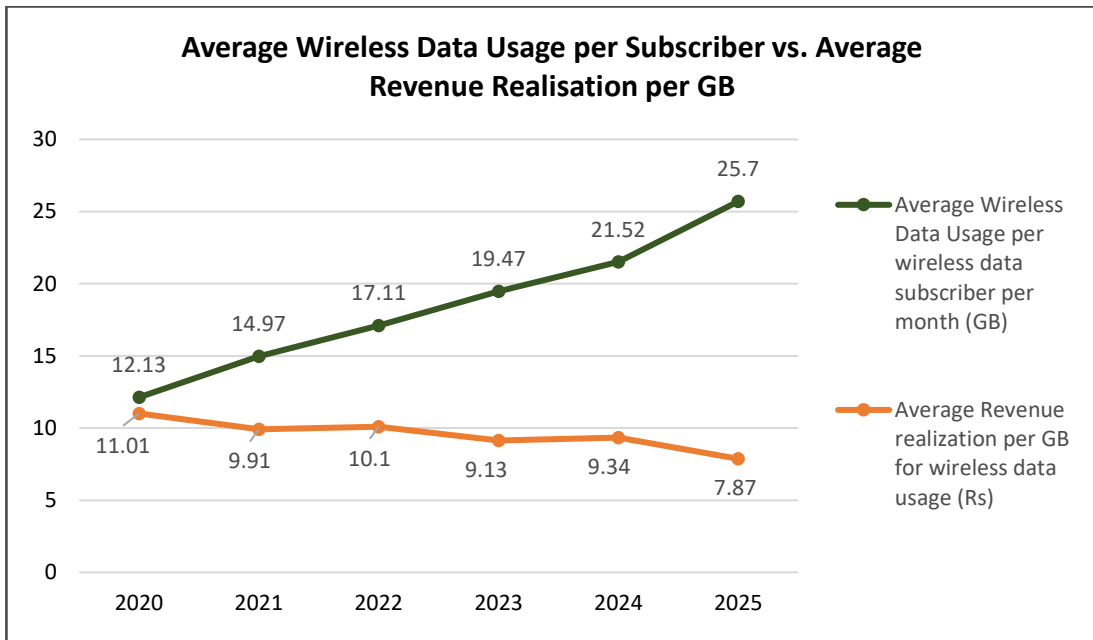


(Source: The International Telecommunication Union ICT Price Statistics 2025)

- b) This unprecedented affordability has been achieved without direct government intervention or tariff regulation. Competitive market dynamics have driven prices down while maintaining quality of service. As a result, the need for alternative access mechanisms such as Public Wi-Fi for affordability reasons is significantly diminished.

4. Usage of Data has Grown Exponentially

- a) Driven by affordability, the usage of mobile data has grown exponentially over the past decade. Indian mobile subscribers now consume an average of over 25 GB of data per user per month, one of the highest levels in the world.
- b) This trend indicates that consumers are neither constrained by access nor affordability barriers. Instead, they are actively relying on mobile broadband for a wide range of use cases, without any demonstrable dependence on Public Wi-Fi.



(Source: TRAI Telecom Subscriptions Reports)

- c) Moreover, This surge in consumption has been accompanied by a sustained decline in the cost of data. This reinforces a virtuous cycle lower per-GB costs drive higher consumption. As a result, Indian users benefit from one of the most data-rich and cost-efficient mobile broadband environments globally, reducing the need to rely on Public Wi-Fi for routine usage.
- d) In contrast to the above, multiple authentication requirements, fragmented payment mechanisms, security concerns and limited interoperability across networks, in case of Public Wi-Fi adversely affect user demand and service adoption.

5. **Advisory on Security Risks Associated with Public Wi-Fi Networks**

- a) The need for Public Wi-Fi is further diminished by various security/ safety related concerns. The Government itself has acknowledged these concerns. The Indian Computer Emergency Response Team (CERT-In), under the Ministry of Electronics and Information Technology (MeitY), through various recent advisories and cybersecurity awareness campaigns, has cautioned users against undertaking financial transactions or sharing sensitive personal information over Public Wi-Fi networks. These advisories reinforce the inherent vulnerabilities associated with shared and open-access Public Wi-Fi environments and explain the strong consumer preference for secure and trusted mobile broadband connections.
- b) CERT-In has further advised users to avoid entering sensitive information while connected to Public Wi-Fi networks and to rely on secure private networks for such activities. The advisories also highlight that even routine work-related activities, such



as accessing emails or logging into accounts over unsecured Public Wi-Fi, may expose users to cybersecurity risks.

- c) COAI submits that these concerns are particularly significant in the present context, where digital payments and online financial services are deeply integrated into daily life. The Government's own cybersecurity advisories therefore underscore the security limitations of shared Public Wi-Fi networks and further explain consumer preference for secure, personal mobile broadband connectivity.



(Source: website of CERT-In)

6. Public Wi-Fi Has Lost Relevance

- a) It is respectfully submitted that because of the above listed factors, the case for large-scale Public Wi-Fi expansion in India is significantly weakened and Public WiFi has lost its relevance.
- b) It is imperative to note that this is the direct outcome of sustained private investments in 4G, 5G, and FTTH networks, enabling telcos to deliver reliable, secure, and high-quality connectivity at scale, without any evidence of market failure. Consequently, mobile handsets have become the dominant access point for broadband services across the country.
- c) The Consultation Paper further itself recognises practical barriers to Public Wi-Fi such as discovery, authentication requirements, and security concerns combined



with minimal cost advantage, have resulted in low adoption. For most users, marginal savings do not outweigh the convenience and trust associated with personal mobile connections. Thereby significantly reducing the functional necessity of Public Wi-Fi.

Our detailed response on the issues raised in the Consultation Paper are as below:

Q1. What are the key supply-side constraints affecting Public Wi-Fi proliferation in India? What targeted policy or regulatory measures may be required to address these supply-side constraints? Please provide your response in detail with justification.

COAI RESPONSE

- a) While the fibre connectivity in India has improved significantly at higher levels of network aggregation, substantial gaps continue to persist at the access and last-mile levels. This remains one of the key supply-side constraints affecting wider proliferation of not just Public Wi-Fi networks, but also the larger broadband ecosystem.
- b) Further, despite the notification of the Telecommunications (Right of Way) Rules, 2024, several implementation-level challenges continue to hinder infrastructure deployment. These include non-uniform adoption and implementation of the Rules across States, municipalities, and local authorities; imposition of high and non-standardised charges; multiple approval requirements from various civic and utility agencies; and delays in granting permissions within prescribed timelines. Such procedural and operational bottlenecks significantly impact the timely rollout of telecom infrastructure.
- c) In addition, difficulties in accessing public infrastructure and street furniture, lack of coordination among local authorities, high deployment and maintenance costs further constrain scalable expansion of telecom networks. These supply-side challenges adversely affect private investment incentives and increase the overall cost of broadband deployment. We therefore submit that all policy measures and incentives should be equally applicable to all players in the telecom/ digital telecom infrastructure.
- d) Accordingly, there is a need for a more streamlined, transparent, and uniformly implemented regulatory framework to facilitate faster deployment of telecom and broadband infrastructure. Policy measures may include effective enforcement of the RoW Rules across all States and local bodies, easier access to government-owned infrastructure and street furniture, and promotion of fibre expansion in underserved areas. Such measures would help create an enabling environment for efficient and scalable broadband connectivity in India.



Q2. What are the major demand-side constraints limiting the uptake of Public Wi-Fi services in the country? What targeted policy or regulatory measures may be required to address these demand-side constraints? Please provide your response in detail with justification.

COAI RESPONSE

- a) It is respectfully submitted that the demand-side dynamics must be assessed realistically. The principal constraint is that TSP-led mobile broadband services in India have evolved so successfully that the need for Public Wi-Fi as an alternative access medium remains inherently limited for most consumers.
- b) India's broadband subscriber base has crossed 1 billion, representing a more than sixfold increase over the past decade, while per-user data consumption in the country is among the highest globally. Mobile data tariffs continue to remain among the lowest in the world, and significant improvements in network coverage, speeds, and service quality have enabled seamless, affordable, and always-on internet connectivity for consumers across both urban and rural areas.
- c) Further, Telecom Service Providers (TSPs) are rapidly rolling out 5G networks across the country with significant investments in next-generation digital infrastructure. The expansion of 5G services is expected to further enhance mobile broadband capabilities by delivering significantly higher speeds, lower latency, improved network capacity, and superior user experience, thereby further reducing the dependence on Public Wi-Fi networks for routine broadband access requirements.
- d) Moreover, in the case of Public Wi-Fi, multiple authentication requirements, fragmented payment mechanisms, security concerns and limited interoperability across networks adversely affect user demand and service adoption.
- e) Thus, mobile broadband already offers a compelling combination of affordability, convenience, reliability, mobility, and security, which substantially reduces consumer dependence on Public Wi-Fi networks. Users are generally able to access uninterrupted connectivity directly through their mobile subscriptions without the inconvenience associated with hotspot discovery, repeated authentication requirements, variable service quality, and fragmented user experience often associated with Public Wi-Fi access.
- f) This situation is not indicative of any policy failure but rather reflects the success of sustained private investment and large-scale network deployment undertaken by



Telecom Service Providers (TSPs). Accordingly, any demand-side strategy relating to Public Wi-Fi must be calibrated to these prevailing market realities.

- g) It is also very pertinent to note that, as highlighted by TRAI in its consultation paper, some countries provide free public Wi-Fi in public places. In India as well, we believe that consumer expectations point toward public Wi-Fi access being free. This is an important aspect which requires consideration of the Authority.
- h) Thus, Policy interventions should focus on addressing consumer expectations, genuine connectivity gaps and specific use cases, rather than attempting to artificially create demand in areas where the market has already effectively addressed consumer connectivity requirements.

Q3. Despite the PM WANI initiative, scaling the number of public hotspots across diverse geographies, especially in remote and underserved regions, remains uneven. What are the key challenges in expanding both the density and geographic spread of hotspots, and what strategies could help accelerate more balanced, nationwide coverage?

Please provide your response in detail with justification.

AND

Q4. What changes, if any, are required in the existing PM-WANI framework to improve revenue certainty and long-term sustainability for PDOs/PDOAs?

Please provide your response in detail with justification.

COAI RESPONSE

- a) As stated in response to Q1 and Q2, we submit that there are several demand-side and supply-side constraints which have adversely impacted the scaling up of paid Wi-Fi for public under PM-WANI across the country.
- b) Among these, we submit that the demand-side constraints are significantly more pronounced and continue to be the primary impediment to widespread adoption and commercial viability of the PM-WANI framework. In particular, the availability of affordable, seamless, and ubiquitous mobile broadband services in India has substantially reduced the consumer need for public Wi-Fi access, thereby limiting the demand for PM-WANI-based services.
- c) As stated in our response above, in the case of Public Wi-Fi, multiple authentication requirements, fragmented payment mechanisms, security concerns, and limited



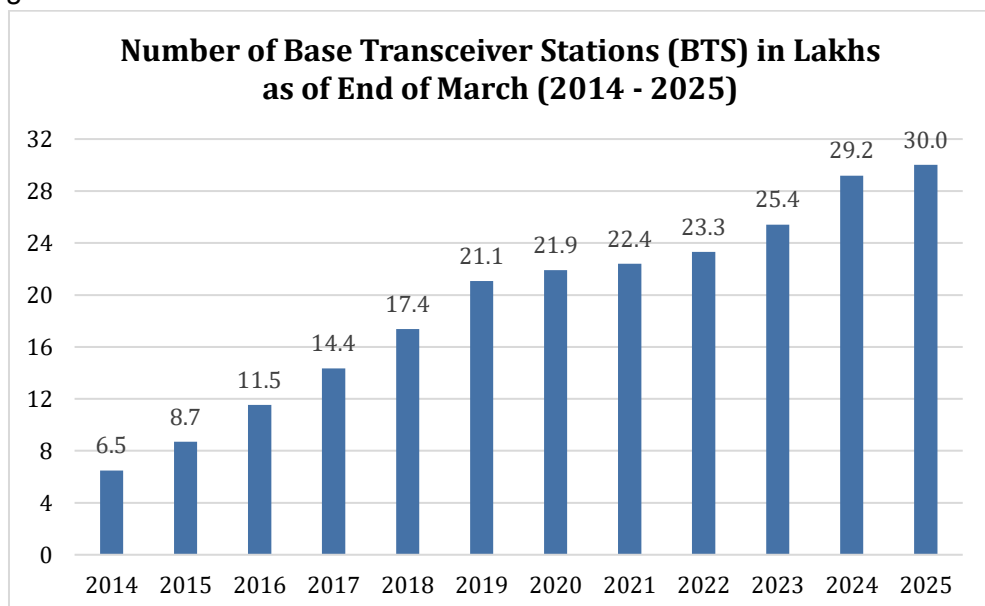
interoperability across networks adversely impact user demand and hinder wider service adoption.

- d) As a result, there remains limited scope for large-scale growth and proliferation of public Wi-Fi services in India under the present market conditions.

Q5. Are there any other challenges currently faced by PDOAs/PDOs? If yes, what changes can enhance the participation of entrepreneurs under the PM-WANI framework? Please provide your response in detail with justification.

COAI RESPONSE

- a) We submit that the, PDOs (Public Data Offices) and PDOAs (Public Data Office Aggregators) have been provided with a facilitative regulatory regime with no levies or charges and price control on supply side, thus clearly the only challenge faced by these entities is lack of acceptance by public and lack of demand.
- b) Today, massive and ubiquitously available telecom networks are the natural choice for subscribers when it comes to using mobile data. Riding on massive private investments, millions of base transceiver stations (“BTS”) have been installed across the country. This has led to a decline in consumer interest in paid Wi-Fi services, as consumers do not feel the need to rely on Public Wi-Fi hotspots and instead prefer using mobile data provided by telecom service providers. Consequently, the rollout of Public Wi-Fi hotspots under the PDO model has remained minimal and insignificant.



(Source – DoT Annual Report)



- c) Therefore, it is important to recognise that the challenges faced by the PM-WANI ecosystem are largely structural in nature and arise from the broader market reality of highly affordable mobile broadband services in India. It is also pertinent to note that, over the past year, the Government has extended several policy benefits and incentives to public Wi-Fi including the recent DoT's amendment dated 16th September 2024. Despite this, the uptake has remained minimal. Accordingly, even supportive policy measures may have limited impact on improving participation and the long-term scalability of Public Wi-Fi.

Q6. Are there improvements needed in the Authentication, Authorization, Roaming, and Payment architecture of the PM-WANI Framework? Please share suggestions, if any.

Please provide your response in detail with justification.

COAI RESPONSE

- a) COAI submits that while the Consultation Paper identifies certain limitations in the existing authentication, payment, and roaming architecture under PM-WANI, any proposal to substantially modify the present framework must be examined in the appropriate operational, regulatory, and security context.
- b) It is acknowledged that repeated OTP-based authentication requirements, fragmented payment mechanisms, and limited interoperability across networks may create friction in certain deployment scenarios. In this regard, limited standardisation and streamlining of processes may improve user convenience and enhance operational efficiency within the PM-WANI ecosystem.
- c) However, it is important to note that the existing OTP/KYC-based authentication framework was introduced pursuant to the security requirements prescribed by the Department of Telecommunications (DoT). The framework serves an important regulatory and security objective by ensuring user traceability, preventing misuse, and enabling compliance with lawful interception, monitoring, and other security-related obligations.
- d) Public Wi-Fi networks, by their very nature, are shared and open-access environments and are therefore inherently more vulnerable to misuse, cyber threats, spoofing, and unlawful activities as compared to personal mobile broadband connections. In this context, the existing authentication framework acts as a critical safeguard by preventing anonymous and untraceable usage of public networks. Accordingly, any dilution of authentication requirements solely for the purpose of improving user convenience may inadvertently compromise essential standards



relating to security, traceability, accountability, and lawful enforcement.

- e) Similarly, proposals relating to centralized authentication or payment gateways, mandatory roaming arrangements, or super-aggregator models must be approached with caution. Such frameworks may lead to increased cybersecurity vulnerabilities, operational risks, concentration of sensitive user and transaction data, and higher compliance complexity across the ecosystem. Any such measures should therefore be carefully evaluated to ensure that they do not undermine network security, operational flexibility, or the existing distributed architecture of PM-WANI.
- f) Most importantly, such process always work better if left to market forces otherwise, any prescriptive regulated approach carries risks of becoming outdated soon and will restrict innovation and dynamic process improvements.

Q7. In the Indian context, which of the following models would be more appropriate for the proliferation of Public Wi-Fi?

- a. **A model where the Government actively ensures hotspot deployment through direct funding and implementation support, including backhaul provision; or**
- b. **A model where the Government primarily ensures availability of robust backhaul infrastructure and intervenes in hotspot deployment only in cases of market failure.**

Please provide your response in detail with justification.

AND

Q8. Is there a need to adopt separate strategies for Public Wi-Fi proliferation in rural and urban areas? If yes, suggestions may be provided. Please provide your response in detail with justification.

AND

Q9. What measures can be taken to improve the deployment and uptake of Public Wi-Fi networks in high-footfall areas for both outdoor (such as bus stops, roadside transit points, open public parks, markets, tourist sites), and indoor (such as airports, railway stations, malls, public institutions)? Please provide your response in detail with justification, separately for outdoor and indoor scenarios.



COAI RESPONSE

- a) COAI submits that a differentiated approach for urban and rural areas may be considered only to a limited extent, since the underlying demand for Public Wi-Fi remains constrained across both segments. The core issue is not merely one of deployment models or geographic focus, but the fact that consumers today have limited incentive to rely on Public Wi-Fi networks in light of the widespread availability of affordable and high-quality mobile broadband services. Consequently, the viability and scalability of Public Wi-Fi ecosystems continue to remain structurally weak in both urban as well as rural markets.
- b) Further, even in locations where Public Wi-Fi infrastructure has been deployed, utilisation levels have generally remained low due to the superior convenience, reliability, and affordability of mobile broadband services. Accordingly, large-scale proliferation strategies for Public Wi-Fi, whether in rural or urban areas, do not appear economically justified.

Q10. If the Government decides to provide financial support for the proliferation of Public Wi-Fi, which funding mechanisms would be most suitable for India? Should a uniform funding mechanism be adopted nationwide, or should differentiated funding mechanisms be used for rural, urban, and high-footfall areas? Please provide your response in detail with justification.

AND

Q11. What criteria should govern the allocation and disbursement of funds across rural, urban, and high-footfall areas, respectively? Please provide your response in detail with justification.

COAI RESPONSE

- a) COAI reiterates that any funding support proposed for Public Wi-Fi initiatives must be viewed in the context of the contributions made by Telecom Service Providers (TSPs) to the Digital Bharat Nidhi (DBN) and cannot be considered in isolation. The Consultation Paper itself recognises the critical importance of broadband connectivity and the substantial role played by Telcos in creating and sustaining the digital communications ecosystem across the country. Telcos continue to make significant financial contributions towards DBN while simultaneously undertaking large-scale investments in spectrum acquisition, network infrastructure, rural connectivity, and regulatory compliance obligations.



- b) In this context, it would be inherently inequitable and disproportionate if funds substantially contributed by TSPs are utilised to support entities operating within the Public Wi-Fi ecosystem that neither contribute to DBN nor bear comparable licensing, infrastructure, security, quality of service, and regulatory obligations. Such an approach will weaken incentives for continued large-scale investments in telecom infrastructure by licensed operators. Accordingly, any funding framework must ensure fairness, proportionality, and equitable treatment across all stakeholders contributing to the national digital connectivity ecosystem.

Q12. Is the lack of adequate and reliable last-mile connectivity a critical constraint for the proliferation of Public Wi-Fi in the country? If yes, what specific measures may be considered by the Central Government, State Governments, and local bodies to address the last-mile constraints? Please provide your response in detail with justification.

AND

Q13. Is there a need for the Government to provide funding for provisioning of last mile connectivity in the uncovered or underserved areas for Public Wi-Fi networks? If yes, which funding option is best suited in the Indian context, and what should be the criteria for rural, urban, and high footfall areas, respectively? Please provide your response in detail with justification.

COAI RESPONSE

- a) We submit that any Government support for last mile connectivity should be extended in a fair, technology-neutral, and non-discriminatory manner to all eligible connectivity providers, including Telcos and Internet Service Providers (ISPs), which possess the technical expertise, regulatory compliance framework, operational capabilities, and proven track record required to deliver reliable and scalable connectivity services. This would ensure efficient utilisation of public funds while promoting sustainable and effective connectivity outcomes.

Q14. Are there any RoW challenges faced by service providers in accessing public places or street furniture to install Public Wi-Fi hotspots? If yes, details may be provided along with suggestions for improvements. Please provide your response in detail with justification.

COAI RESPONSE

- a) While 33 out of 36 States/UTs have notified the Telecommunications (Right of Way) Rules, 2024, the telecom industry continues to face significant challenges in



ensuring their uniform implementation across various State and local authorities due to the federal administrative structure. Telecom Service Providers (TSPs)/Infrastructure Providers (IP1's) are encountering issues such as imposition of exorbitant and non-uniform charges, varied documentation requirements, procedural inconsistencies, and delays in approvals, which adversely impact timely rollout of digital infrastructure and network expansion.

- b) Accordingly, there is an urgent need for greater coordination and effective enforcement mechanisms to ensure uniform, transparent, and time-bound implementation of the Telecommunications (Right of Way) Rules, 2024 across all States and local authorities, to facilitate seamless deployment of telecom infrastructure and support the country's digital connectivity objectives.
- c) Further, Municipalities and gram panchayats should be encouraged to adopt standardised RoW policies, nominal charges, and single-window clearances that support ubiquitous digital infrastructure deployment.

Q15. What facilitative roles can State Governments play in accelerating Public WiFi deployment across rural, urban, and high-footfall areas, respectively? Should States consider deploying Public Wi-Fi networks at the municipal and gram panchayat level? Please provide your response in detail with justification.

AND

Q16. Should the State Government need to take initiatives to improve the availability of last-mile connectivity for Public Wi-Fi networks? If yes, what measures can incentivise States /municipalities to undertake city- and town level fabrication to ensure Public Wi-Fi network proliferation? Please provide your response in detail with justification.

COAI RESPONSE

- a) State Governments can play a facilitative role in accelerating deployment of telecom and broadband infrastructure (without being limited to Public Wi-Fi), by simplifying Right of Way (RoW) approvals, enabling access to government-owned street furniture and public infrastructure, and establishing transparent and time-bound clearance mechanisms.
- b) However, any initiative at the municipal or gram panchayat level should not be limited exclusively to Public Wi-Fi networks. Policy support should instead focus on improving overall broadband access and usage . This is particularly important as affordable, seamless, and ubiquitous mobile broadband services have significantly reduced consumer dependence on Public Wi-Fi in both urban and rural areas.



Q17. What facilitative roles can local bodies play in accelerating the deployment and sustainable operation of Public Wi-Fi networks in rural and urban areas?

Please provide your response in detail with justification.

COAI RESPONSE

- a) Local bodies such as Municipalities, Panchayati Raj Institutions, and Urban Local Bodies are the closest administrative entities to the actual deployment environment and therefore play an important facilitative role in the rollout of telecom and broadband infrastructure. Their support is operationally significant even where they are not direct funding or implementing agencies. In both rural and urban areas, local authorities can help streamline deployment processes, reduce administrative bottlenecks, and facilitate access to public infrastructure required for connectivity deployment.
- b) One of the key areas where local bodies can play a constructive role is in simplifying and expediting Right of Way (RoW) approvals. Time-bound approvals for deployments, would significantly reduce delays and improve ease of deployment.
- c) Local bodies can also facilitate access to government-owned street furniture and public infrastructure such as poles, streetlights, bus shelters, public buildings, railway stations, and other common utility assets on fair, transparent, and non-discriminatory terms. Standardisation of charges, documentation requirements, and approval conditions across jurisdictions would further reduce uncertainty and deployment costs.

Q18. What regulatory or policy incentives, schemes or programs are required to promote active participation of TSPs and ISPs in Public Wi-Fi deployment?

Please provide your response in detail with justification.

COAI RESPONSE

- a) We reiterate that any regulatory or policy incentive framework intended to support connectivity expansion should not be selectively designed only for the Public Wi-Fi ecosystem, but should be focussed on expanding overall broadband access.
- b) Therefore, rather than creating separate incentive structures exclusively for Public Wi-Fi, policy efforts should focus on reducing the burden of levies on licensed TSPs, who build and sustain the foundational communications infrastructure upon which all digital connectivity, including Public Wi-Fi, ultimately depends.



- c) The cost structure of licensed telecommunications service providers (TSPs) is significantly strained by various factors. Chief among these are the high levies imposed on the telecom sector, which include the Licence Fee (LF) and the Spectrum Usage Charge (SUC). In addition, the substantial upfront and recurring costs associated with spectrum acquisition—arising from auction mechanisms that often drive prices well above efficient market levels—further exacerbate financial pressures. Compounding these issues is the heavy compliance burden stemming from both regulatory mandates and security-related obligations. These requirements, inflate the operational and capital expenditure of TSPs.
- d) Therefore, given the substantial unutilized corpus of USO Fund, the 5% contribution to the USO should be suspended until this fund is completely utilized. Further, the current License Fee of 3% of the AGR is very high and the same must be brought down to 1% of AGR in line with the international norms. Thus, license Fee should be brought down from the present rate of 8% of the AGR (which includes 5% of USOF contribution) to 1% at the earliest to cover administrative costs by the DoT/Government.
- e) In light of the foregoing there exists an urgent and compelling need to reduce the overall cost burden borne by licensed TSPs.. Policy interventions could include rationalising the Licence Fee, revisiting spectrum pricing mechanisms to align them with long-term sectoral growth and reducing the regulatory and security compliance.

Q19. What regulatory or fiscal incentives, schemes or programs may be required in the provisioning of bandwidth and backhaul for Public Wi-Fi networks? Please provide your response in detail with justification.

COAI RESPONSE

- a) Besides reduction of levies on TSPs, we submit that rationalisation of Right of Way (RoW) costs remains critical. While 33 out of 36 States/UTs have notified the Telecommunications (Right of Way) Rules, 2024, the telecom industry continues to face significant implementation challenges, including non-uniform and exorbitant charges, varied documentation requirements, procedural inconsistencies, and delays in approvals across State and local authorities. These issues adversely impact fibre deployment, backhaul provisioning, and timely network expansion.
- b) Accordingly, greater coordination and stronger enforcement mechanisms are required to ensure uniform, transparent, and time-bound implementation of the Telecommunications (Right of Way) Rules, 2024 across all States and local bodies.



Q20. What measures can be adopted to incentivise private enterprises, commercial establishments, shop owners, community institutions etc. to install public WiFi hotspots?

Please provide your response in detail with justification.

COAI RESPONSE

- a) In light of the widespread availability of affordable, and secure mobile broadband services which have substantially reduced consumer dependence on Public Wi-Fi, we respectfully submit that there appears to be no justification for introducing specific policy measures or incentive frameworks aimed at encouraging private enterprises, commercial establishments, shop owners, or community institutions to install Public Wi-Fi hotspots.

Q21. Is there a need to strengthen the role of public or private entities as system integrators for the deployment of Public Wi-Fi networks? If yes, what policy or institutional support may be required? Please provide your response in detail with justification.

COAI RESPONSE

- a) The core constraints affecting Public Wi-Fi proliferation are structural and economic in nature, and limited consumer demand in the presence of affordable mobile broadband.
- b) Therefore, introducing additional institutional or intermediary layers is unlikely to address these underlying issues and may instead increase operational complexity and inefficiency.

Q22. Are users facing challenges in the authorization and authentication procedures for accessing Public Wi-Fi Networks? If yes, how can authorization and authentication processes be simplified while ensuring security and compliance? Please provide your response in detail with justification.

AND

Q23. Is there a need for a centralized platform for authentication and payment systems in the Public Wi-Fi ecosystem? If yes, which entity is best suited for its implementation and management? Please provide your response in detail with justification.

AND



Q24. What steps are required to achieve interoperability and seamless roaming among Public Wi-Fi networks? Should inter-hotspot roaming be made mandatory, and if yes, should a “super-aggregator” need to be introduced to facilitate it? Please provide your response in detail with justification.

COAI RESPONSE

- a) We reiterate that, despite several policy incentives and benefits extended by the Government to promote the growth of the Public Wi-Fi ecosystem in India, the uptake of these services has remained limited. In this context, it is unclear how the introduction of a centralized platform for authentication, interoperability, and seamless roaming would, by itself, contribute to the proliferation of Public Wi-Fi services.
- b) Most importantly, such process always work better if left to market forces otherwise, any prescriptive regulated approach carries risks of becoming outdated soon and will restrict innovation and dynamic process improvements.
- c) Nevertheless, any reforms relating to authentication and authorisation mechanisms must be undertaken with due regard to security and data protection considerations. While efforts may be made to simplify and streamline user access, the framework should continue to ensure appropriate safeguards relating to network security, lawful interception, traceability, and prevention of misuse.

Q25. What monetisation models are most appropriate for rural, urban, and high footfall locations, respectively? Please also suggest any additional monetisation models that may be suitable in the Indian context.

Please provide your response in detail with justification.

COAI RESPONSE

- a) In our view, the monetisation opportunities available to Public Wi-Fi will continue to be extremely limited. Unlike in global markets where mobile broadband services are comparatively expensive or capacity constrained, consumers in India already have access to affordable and widely available mobile data services, thereby reducing the commercial attractiveness of paid Public Wi-Fi offerings.
- b) As a result, Public Wi-Fi providers face considerable challenges in generating sustainable revenue streams, whether through direct user charges, subscription-based access models, advertising, or value-added digital services.



- c) Moreover, as stated in response to Q2, it is our understanding that consumer expectations in India are oriented toward access to free Public Wi-Fi. Under such circumstances, Public Wi-Fi operators may be able to generate revenues through advertisements, rather than through direct charges to end users.

Q26. Please provide any additional comments, observations, or suggestions related to the proliferation of Public Wi-Fi in the country, including any potential issues or considerations that may not have been covered in the sections above.

Please provide your response in detail with justification.

- a) N.A.

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