

ASSOCHAM Response on Consultation Paper on ‘Model for Nation-wide Interoperable and Scalable Public Wi-Fi Networks’

Q1. Is the architecture suggested in the consultation note for creating unified authentication and payment infrastructure will enable nationwide standard for authentication and payment interoperability?

Q2. Would you like to suggest any alternate model?

ASSOCHAM’s Response:

Before commenting on the draft model, we would like to state that in India, the telecom services can only be provided by licensed entities. Since Wi-Fi services is also an internet services, these services can only be provided under the telecom licence granted under Section 4 of the Indian Telegraph Act. For reselling of telecom services, the DoT has introduced the Unified Licence (VNO) after receipt of TRAI’s recommendations also. Till any model ensures that the provision of telecom services is carried out by the licensed entities, we have no issue.

With regard to the specific model, if such a model is going to be the only one for offering Wi-Fi services in India, then such a proposal is unwarranted, as no particular business model should be imposed on TSPs through any regulatory intervention. Alternatively, if such a model is only one of the options for offering Wi-Fi services in India, it does not require any specific regulatory intervention as market forces should be free to develop their own business models while upholding the licensing framework.

Q4. What should be the regulatory guidelines on “unbundling” Wi-Fi at access and backhaul level?

ASSOCHAM’s Response:

In India, the licensing framework has always ensured that the issues related to any infrastructure sharing between two licensed entities are left to market forces without any regulatory intervention. We request TRAI to continue with the same regulatory framework and should be left to the licensed operators to decide about the terms of sharing of their infrastructure.

Q3. Can Public Wi-Fi access providers resell capacity and bandwidth to retail users? Is “light touch regulation” using methods such as “registration” instead of “licensing” preferred for them?

Q5. Whether reselling of bandwidth should be allowed to venue owners such as shop keepers through Wi-Fi at premise? In such a scenario please suggest the mechanism for security compliance

ASSOCHAM'S Response:

Last year, the Government of India introduced the Unified Licence (VNO) under which the reselling of telecom services can be done after having a tie-up with any licensed operator. This policy was introduced by the government after receipt of the recommendations of TRAI. In fact, in its recommendations on VNO, the TRAI had recognized the need for a VNO licence for the entities, who wants to offer Wi-Fi services in India. Since there is already a licensing framework for reselling of Wi-Fi services in line with TRAI's own recommendations, we do not suggest any change in the same. Any reselling of telecom services including Wi-Fi should be done through a VNO licence only. This is to ensure the level playing field in the telecom sector.

Q6. What should be the guidelines regarding sharing of costs and revenue across all entities in the public Wi-Fi value chain? Is regulatory intervention required or it should be left to forbearance and individual contracting?

ASSOCHAM's Response:

We believe that the issues related to sharing of costs, revenue, components of sharing does not warrant any regulatory intervention. The Indian telecom sector is quite competitive and hence, such issues should be left to the market forces.