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9th December, 2016

Sub : Response to Consultation Note on Model for Nation-wide Interoperable and Scalable Public Wi-Fi Networks

Dear Sir,

In response to the above consultation note dated 15th November 2016, we would like to submit our inputs on the relevant issues, as under.

The consultation paper vide Chapter 1 Sub-heading C (*Problems were cited in large scale deployment of public Wi-Fi*) under Sr No. (6 a), TRAI itself identifies backhaul for Wi-Fi networks as a challenge because of spectrum scarcity and assignment challenges.

The evolving high data-rate broadband access networks based on Wi-Fi needs to be supported by backhaul to carry high data bandwidth. Globally license free bands are being used based on 802.11 b/g/n and other evolving standards for this purpose. It may be noted that at present in India, 5.8 GHz has only 50 MHz bandwidth (5825 MHz to 5875 MHz) exempted from licensing requirements.

In this regard, we would like to refer to TRAI recommendations on "*Delivering Broadband Quickly: What do we need to do?*" dated 17 April 2015, TRAI had specifically mentioned to carry out the de-licensing of 5.725-5.825 GHz frequency band for outdoor usage in the next 6 months. The recommendations further suggested that *DoT must release larger quantities of unlicensed spectrum (as has been done in many parts of the world) for better quality of service and reducing the strain on existing networks. As the implementation of the same is still pending, it is suggested that TRAI should strongly recommend and reiterate its need on urgent basis.*

We also understand from our members that WPC (DOT) is in the process of revision of NFAP 2011 and working group discussions are progressing to incorporate the industry requirements in the revised NFAP. In our considered opinion, DOT may direct WPC NFAP Review / Revision Committee to suitably include the above referred TRAI recommendations to license exempt the frequency band 5725 MHz to 5825 MHz (100 MHz) for broadband backhaul while revising the NFAP 2011.

We hope our above inputs will be considered suitably while TRAI is finalizing its recommendations to the Government of India on this important topic.

For Telecom System Design & Manufacturers Association

Authorized Signatory

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