

Kind Attn: **Shri. Amit Sharma, Advisor (Financial & Economic Analysis) E-mail: fa@traigov.in**

Dated: 06 September 2024

To

TRAI

**World Trade Centre, Tower-F,
Nauroji Nagar, New Delhi- 110029**

Subject: THE TELECOMMUNICATION TARIFF (SEVENTIETH AMENDMENT) ORDER, 2024 (No. of 2024)
(Comment submission)

Respected Sir/Madam

We are a registered PDOA (PMWANI-DLI-110095-PDOA000062) and APP provider (PMWANI-DLI-110095-APP000061) in the PM-WANI framework ecosystem. As per the subjected line for comment submission below mentioned are the points for submission to consider and bring tariff for PM-WANI PDO at par with existing FTTH broadband rates.

1. Broadband internet being the new fuel for economic growth of any country it becomes very necessary to have the entire population of the country access to high-speed internet through fibre connected back haul.
2. With major population residing in tier II or tier III cities and do not majorly subscribe to broadband connections and are largely dependent on mobile networks for quota internet access at 1GB/2GB per day access. With the high definition level of content available online such quota internet would get finished by half of the day and the mobile user is left without internet for rest of the day. Now the user has to wait for the next day to have access to internet on his mobile device. Access to PM-WANI internet at much competitive rates with unlimited access will allow them to have access to internet throughout the day.
3. PM-WANI framework was envisaged to connect and supply high-speed internet to students and to population residing in highly congested areas. They generally live in areas with very high density and internet access through mobile is particularly slow and patchy. Access to internet with wifi as last mile at much cheaper rates will enable the lower income group to enjoy the benefits of high quality internet.
4. Tourist places such as heritage sites, bus stands, railway stations, airports, public events etc. have highly dense mobile users. Since, these days, the mobile are always connected to internet either the user is using it actively or not, there are applications always running in the backend using internet. In such scenarios where there is dense mobile users, the active users face very slow internet connection and to access information about their bookings/maps etc. get delayed. Such users on PM-WANI network will provide an alternative to urgent users with no mobile data and also provide opportunity-based business to PM-WANI operators.
5. Wifi users at hostels, cafes, restaurants, public libraries generally use shared internet from the property owner's internet connections thus by-passing the mandatory KYC requirement for

internet access. With PM-WANI enabled KYC mechanism, these users would be compliant to such shared internet access.

6. Small shopkeepers, tea stalls etc., won't be able to maintain pricey internet leased line and its associated infrastructure, but generally have affordable FTTH broadband connection installed to access their cameras etc. Such already installed internet connection can be upgraded to provide PM-WANI internet access to nearby users and their visiting customers. This will also help them have the transactions happen with UPI where their visiting customers face low/slow mobile networks.
7. PM-WANI wifi network has the potential to provide internet with readily available wifi devices to cover up areas where mobile network is not available in interiors of houses/shops/basements by simple extension of the wifi devices at much cheaper infrastructure cost.
8. Areas where online registration has to be done prior to entry such as hospitals/events/exhibition, access to PM-WANI network will enable such registrations happen at much faster rates, thus reducing multiple failed attempts, de-congesting entry areas with visitors try to register for hospital appointments or events or exhibition passes.
9. Having people internet access such as in rural areas, students at much cheaper rates and purchase of internet in sachets who would have otherwise shied away due to the exorbitant monthly commitment to made for FTTH broadband connection.
10. Students will have access to unlimited internet access on PM-WANI network, and thus enable them complete their online education at their various online education programs and popular video and content sharing platforms such as youtube etc.
11. Availability of PM-WANI in rural areas will help business thriving in these areas to connect to mainstream businesses in tier 1 cities thus generating employment in these segments.
12. Employment generation opportunities with sprout of new entrepreneurs for PM-WANI PDO operators.
13. Trains/buses/metros on the move can provide PM-WANI wifi network to their passengers by connecting their back-haul to 5g/4g networks.

With so many use cases on the PM-WANI wifi access, we strongly believe that having PM-WANI backhaul powered by FTTH connections can generate new opportunities and bring a very large population segment to high speed internet.

This also aligns with one of the examples quoted by the honorable PM where in a speech he mentioned that one thing might lead to another where in an example he mentioned that spending crores of Rupees in connecting far flung areas with electricity connection. But once electricity reached such places, there was a sudden increase in purchase of house hold electric appliances which gave another boost to the local economy to such areas. Therefore, we too anticipate that providing cheaper internet connection can definitely substantially contribute to the economic development of nation.

Best Regards

Jubi Mathew

Winet Infratel Pvt Ltd