



Broadband TRAI <broadbandtrai@gmail.com>

Re: O-Zone Response To Consultation Paper: Model for Nation-wide Interoperable and Scalable Public Wi-Fi Networks

1 message

Dharmendra Amin <dharmendra.amin@o-zone.in>

Fri, Dec 9, 2016 at 7:07 PM

To: Broadband TRAI <broadbandtrai@gmail.com>

Cc: Bobby Sarin <bobby.sarin@o-zone.in>, Jitesh Kejriwal <jitesh.kejriwal@o-zone.in>, Proloy Mitra <proloy.mitra@o-zone.in>, Deepanshu Tyagi <deepanshu.tyagi@o-zone.in>, Sushant Mehra <sushant.mehra@o-zone.in>

Dear Arvind and Kapil, further to our response to the consultation paper on Public WiFi and the proposed architecture, we have some additional queries we would like to table, as they fundamentally affect business models, business proprietary data and the relationship with the user.

We await your feedback, and are happy to meet you and further discuss. Many thanks

Regards

Dharmendra

QUERIES

We at O-Zone sincerely believe that with the suggested architecture, we shall see an up-rise in the Wi-Fi usage with an increase in number of hotspots and more and more people being educated of Public WI-FI.

In continuation to our response to the TRAI consultation note on "*Model for Nation-wide Interoperable and Scalable Public Wi-Fi Networks*", please find below some queries that require your attention and consideration to go forward with the suggested architecture-

Q1. We assume the suggested authentication process through "*Registry*" is not mandatory and will run in parallel to the current OTP Authentication process as the proposed mechanism would have difficulty in addressing certain scenarios like:

- International Roaming Customers,
- Users not having aadhar card,
- Users not having a proper payment mechanism/application except for cash etc.

Q2. We assume the "*Registry*" will be restricted to only Authentication/ KYC of a user?

Q3. The User who connects to the internet using the suggested authentication mechanism of "*Registry*" shall accept to some Terms and Conditions, who will be legally responsible for the Terms and Conditions (TRAI/ WiFi Service Provider/ Back haul provider/ Application using the SDK/API)? [Additionally, as we are encouraging people to pay for the service, who will be responsible for the QoS at the location, as this logically be linked to the Terms and Conditions.](#)

Q4. Wi-Fi user at the location belongs to whom? We assume that the WI-FI user should belong to WI-FI infrastructure provider. Please confirm.

Q5. Will the WI-FI service provider be able to provide dynamic pricing to the users, i.e. different pricing at different locations/areas? If yes, where will information of various pricing plans reside and will the flexibility to introduce design, text, offers etc be provided to the WI-FI service providers?

Q6. For differential pricing by location, how will the call/data flow work?

Q7. How will our proprietary information of the user, like location data, customer data, usage profile, location based customer data, partners, etc be protected from other service providers, under the suggested architecture?

Q8. What safeguards may be present for protection from competition and monetization of our infrastructure by application service providers who use such infrastructure? For Eg. A wallet service provider doing publicity of providing WI-FI access at 3000 locations using its wallet. Further, what safeguards will the neutral Wi-Fi service provider may be able to have for its protection from the business standpoint?

Q9. As per our understanding the "Registry" will be an additional step in the login process and hence adding network hop and latency?

Q10. How will "registry" restrict misuse of the data flowing in and out of neutral public Wi-Fi hotspot?

O-Zone is in the business of providing neutral public Wi-Fi internet facility to the users by deploying the required infrastructure at the locations and later monetizing the infrastructure through mediums like advertising, off-load, etc to have the return of its investment made in the infrastructure. From our understanding of the neutral Wi-Fi internet service play over the years, we firmly believe that neutral public Wi-Fi can grow across the country only on the premise of sharing infrastructure.

On Fri, Nov 25, 2016 at 4:56 PM, Dharmendra Amin <dharmendra.amin@o-zone.in> wrote:

Dear Arvind and Col. Handa, on behalf of O-Zone Networks, please find attached our responses to the Public WiFi consultation paper. We would request a follow up meeting at your convenience to discuss our response and further clarify any points you wish to discuss. Many thanks

Regards

Dharmendra Amin

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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?

Response from O-Zone: Unifying authentication and payment process would not simplify the user journey, or the core backend authentication process. While there are multiple points of failure present today in public WiFi services, unifying the authentication and payment process will add another layer.

The present points of failure in the public WiFi service are:

- EDGE Access Point
- SMSC provider
- Internet backhaul
- WiFi Service Provider CORE

If we have to unify authentication, then all of above needs to unified. This will also have a significant impact on the Revenue Streams as well, as there will be no differentiated services available for the end user or any other related parties like telecom operators, advertisers , content providers etc.

Unification of payments is highly encouraged, as frictionless, secure payments is the only way to grow paid usage, as cash based vouchers are clearly a barrier to uptake in Public WiFi usage . Therefore Payment Gateways can be unified but not authentication.

Q2. Would you like to suggest any alternate model?

O-Zone Response: Neutral Wi-Fi is the only model to encourage across the industry, with global standards based integration for inter-operability. We have seen neutral infrastructure thrive in the cellular tower business, leading to enhanced operational efficiencies and cost reduction. The same should be adopted by Public WiFi across the country, where authentication, inter-operability and payment services should be developed and perfected by all service providers.

The Neutral service provider should be independent of OEMs and should be licensed.

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?

O-Zone Response: Public service providers in the country already face challenges with revenue lines from infrastructure costs. Reselling internet has to be the way forward for the neutral WiFi service provider, else long term sustainability of services and infrastructure cost will never meet ROI.

No – Light touch regulation should not be used instead of licensing. This will crowd the WiFi service market and create absolute chaos with little obligation to security and quality of service. Today quality is already questionable across the various public WiFi services being offered. Opening the service provision to all, will lead to further degradation in the QoS, and a possible negative perception of Public WiFi, which is presently being worked upon by service providers.

Therefore License and related obligations are necessary and should be adhered to, for security purposes and maintaining the QoS.

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

O-Zone Response: yes, unbundling at access and backhaul is the key to the proliferation and roll-out of Public WiFi and it has been hampered by the actual present availability of access and backhaul. Backhaul should be unbundled by the incumbents ~~on a fair commercial basis~~ defined by TRAI.

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

O-Zone Response: If different venue owners set up their own Wi-Fi then the QoS would go away. Venue owners already have enough to deal with on ground operations, adding WiFi security compliance and other service nuances, will lead to another operations team for individual venues to hire. Instead of allowing venues to sell WiFi services, Neutral service providers should enable WiFi venues with managed services that include security compliance.

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?

O-Zone Response: Regulation should only remain on aspects of license and security requirements at places where public WiFi is available. Since the public WiFi space continues to remain at the start of a long journey, the regulations should support service providers to build stable sustainable services. Revenue earning opportunities are minimal, hence infrastructure sustainability is KEY before regulating revenue distribution.

On cost distribution, regulation should ensure that the license fee for Public WiFi service providers takes into account any fees paid by backhaul bandwidth suppliers who are also paying a license fee. There should be no double-counting of license fees.

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