

Dear Mr. Amit Sharma,

We appreciate the Authority's initiative to address this critical bottleneck hindering wider adoption. We are a Technology Provider and a PDOA. We are working on PMWANI for last 3 years with Over 500 Hotspot deployed via the PDOs associated with us. Our response is based on our understanding of the business and past experience.

Our comments on the draft order are as follows:

- **Strong Support:** We fully endorse the proposal to allow PDOs internet connectivity at rates comparable to retail FTTH broadband connections. This aligns with our observations that the high cost of leased lines is a significant barrier for smaller establishments, villages, and shops.
- **Impact Assessment:** We suggest reviewing the impact of the proposed measure in 3 years, rather than the suggested two years. There is need of awareness among PDOs and internet users at large. This activity will take time being vastness of country and effect of this TTO will take significant time in percolating downwards.

Additional Considerations and Suggestions:

- **Data Usage Limits Waiver:** TSPs should offer more flexible data plans for PM-WANI backhaul connections. Currently, even retail customers often face restrictive data limits, Generally of 3333 GB per month. For PDOs serving many users, these limits can be insufficient. Consider tiered pricing or truly unlimited data plans to encourage wider PM-WANI adoption.
- **Service Level Agreements (SLAs):** Implement robust SLAs that include specific uptime guarantees and penalties for non-compliance with both uptime and internet speed commitments. This will ensure reliable performance and address potential misuse.
- **Reporting Requirements:** Require TSPs to submit data on PM-WANI line applications, provisioned lines, uptime, data usage, and other relevant metrics. This will enable TRAI to monitor compliance, identify trends, and take timely corrective actions.
- **Deployment Targets:** Set clear deployment targets to incentivize TSPs to actively promote and support PM-WANI. These targets should align with the scheme's overall objectives and NDCP 2018.
- **KYC and User Type Verification:** Strengthen KYC procedures to include user type verification. This helps prevent commercial misuse of PM-WANI lines and ensures that unlimited bandwidth is used primarily for public internet access. Additionally, this KYC can also ensure that premises offering open public Wi-Fi services like cafes, gyms, restaurants, hostels etc. don't bypass PM-WANI solutions by sharing common passwords.

Supporting Evidence:

Attached is a letter of intent we received for deploying PM-WANI solutions across 9000 villages in Maharashtra. Unfortunately, due to the lack of any available internet backhaul, this entire initiative failed, and not a single hotspot is currently active. This demonstrates the critical role of accessible backhaul connectivity in the successful implementation of PM-WANI.

By addressing these concerns, we can enhance the effectiveness of the PM-WANI scheme and ensure a positive user experience for the public.

We are available to discuss these points further and provide additional information.

Thank you for your continued attention to this matter.

Sumit Garg

Managing Director

Immunity Networks & Technologies Pvt Ltd

P: +91 22 61820810 M: +919920589140

A: 804, DLH Park, rani Sati Nagar, S.V.Road,
Goregaon West, Mumbai 400064

[W: www.immunitynetworks.com](http://www.immunitynetworks.com)

[E: sumit.garg@immunitynetworks.com](mailto:sumit.garg@immunitynetworks.com)

॥ विना संघटना अर्थ नाही जीवना ॥

रजि.मं. महाराष्ट्र

पुणे जिल्हा स्वस्त धान्य दुकानदार व केरोसिन परवानाधारक महासंघ पुणे

सल्लय : आखिल महाराष्ट्र राज्य स्वस्त धान्य दुकान व केरोसिन परवानाधारक महासंघ पुणे.
ऑल इंडिया फेअर प्राईज शॉप डिलर्स फेडरेशन नवी दिल्ली

राष्ट्रीय अध्यक्ष: मा.श्री.पुष्कराज उर्फ काकासाहेब देशमुख

संपर्क पत्ता :- श्रम साफल्य मु.पो.संगमनेर, (माळवाडी), ता.भोर, जि.पुणे.

अध्यक्ष

श्री.सोमनाथ ग. वचकल (भोर)
मो.७०२८५३८०५४

उपाध्यक्ष

श्री.मोहन केशव दुबे (जुन्नर)

मो.८३२९७५२६३५

श्री.प्रकाश गो. खळदकर (खेड)

मो.९२८४९३९२३९

श्री.केशव स. नगरे (इंदापुर)

मो.९८९००५६९९३

श्री.बाबुलालशेट नालबंद (मावळ)

मो.९४२२३२८७७७

श्रीमती हेमलता बा. बढेकर (हवेली)

मो.९७६४३०६३०२

कार्याध्यक्ष

श्री.अशोक ल. दळवी (पुरंदर)

मो.

सचिव

श्री.सुरेश रा.घोलप (आंबेगाव)

मो.९९६०९६७४२९

सहसचिव

श्री.श्रीकांत झा.विरुळे पा.(शिरूर)

मो.९८२३३३२२२२

अभिनेदार

श्री.बंडोपंत द. भोर (आंबेगाव)

मो.९५०३२८९०३५

सहामार

श्री.अरुणशेट हलगे (खेड)

मो.९८२९६००९९०

श्री.रविंद्र आप्या ताकवले (पुरंदर)

मो.९८५००४८४५५

श्री.सुरेश सा. भोसले पा.(बारामती)

मो.९६०४६०३७३७

श्री.महेंद्र हरिभाऊ सरोदे (हवेली)

मो.९८२२६६३४२३

श्री.दत्तात्रय बा.नवले (दोंड)

मो.९७६५५८५४५९

जा.क्र.

दिनांक १५/०१/०२३

We are pleased to confirm that we are choosing Immunity Networks of Technology Pvt. Ltd. as a PMWANI Technology-Device Provider for Pune FCS region.

Immunity network will take care of allocating devices of appointing fair price shops as a PDO under the PMWANI scheme

Terms:-

① FPS working as a PDO will liable to pay Rs. 606 of monthly emt.

② Emt Tenure will be for next 24 months.

③ After 24 months completion ownership of device will be transfer to fair, fair price shop owner

- ④ Immunity network will be providing 9200 devices in Pune Fes region in next 4 months
- ⑤ Device delivery will be done in 1000 device confirmation.
- ⑥ PDO will be by Rs. 300/m to immunity network for rendering services & support, each month
- ⑦ FCS Pune should provide available network availability to immunity networks.
- ⑧ FCS Pune should provide all shop owners list, name, contact number & location details
- ⑨ each FPS owner will be getting his own account details to complete process of registration.

Signed - Wacud S
 ① Mr. Somnath Wadhkar,
 (President of Pune District Fes)

~~###~~
 ② S' Mr. Shikant Shete,
 (President of Satara District Fes)

Validated by.
 ① Jayesh Ganekar