

09 June 2025

**Shri Tejpal Singh,
Advisor (QoS-I)
Telecom Regulatory Authority of India,
Government of India.**

Dear Sir,

Subject: BIF Comments on TRAI's "Draft Manual for Assessment of Digital Connectivity under Rating properties for Digital Connectivity Regulation 2024"

We commend TRAI for its groundbreaking initiatives in enhancing Quality of Service (QoS) and Quality of Experience (QoE) over the past few years, particularly through the Rating of Buildings Regulations and the introduction of fresh service norms for wired and wireless connectivity. In line with these efforts, TRAI issued recommendations on rating buildings and areas for digital connectivity in 2023, followed by the Rating of Properties for Digital Connectivity Regulations, 2024. To further these developments, release of these draft manual titled Assessment of Digital Connectivity under Rating Properties for Digital Connectivity Regulations, 2024 is logical next step of TRAI.

In today's hyper-connected world, reliable and robust digital infrastructure is no longer a luxury—it is a necessity for residential, commercial, and industrial spaces alike. Just as structural integrity, water supply, and electrical systems are assessed for a building's functionality, evaluating, monitoring, and continuously improving Digital Connectivity Infrastructure (DCI) is now just as critical for ensuring high-quality QoS and QoE.

We acknowledge that these regulations are crucial to fostering inclusive digital access, driving economic growth, and enhancing the quality of life across India. However, in order to achieve the intended QoS objectives, certain modifications to the rules are proposed:

Suggested Amendments

1. **Expanding the List of Stakeholders:** TRAI recognizes that the majority of data consumption occurs within buildings, necessitating comprehensive cellular and FTTH/Wi-Fi coverage indoors. Given the diverse landscape of digital connectivity service providers, ensuring seamless access to buildings is essential.

Currently, Chapter 2 (*Role of Stakeholders*) identifies only Telecom Service Providers (TSPs) as primary stakeholders. However, meaningful in-building connectivity requires contributions from

multiple entities, including fixed-line Internet Service Providers (ISPs), Wi-Fi service providers (such as PDOs/PDOAs), Building Management Service providers, and M2M service providers.

To promote clarity and prevent misinterpretation, we propose the inclusion of all relevant access and auxiliary service providers in the official list of stakeholders.

2. **Revising Criteria for Service Provider Weightage:** Sections 4.7.1 and 4.7.2 assign a sub-criteria weightage of 7.5 points each to the number of wireline Internet Service Providers and mobile service providers integrated with Digital Connectivity Infrastructure. To better reflect true competition and accessibility, we recommend setting a minimum threshold:

- A minimum of two service providers should be required for any points to be assigned, ensuring genuine infrastructure sharing.
- A minimum of four service providers should be required to receive the full 7.5 points, fostering competitive service offerings and ensuring superior and reliable QoS.

In our opinion these adjustments shall be benefiting consumers with improved service quality and greater choices.

Thanking you.

Best Regards,



T.V. Ramachandran,
President,
Broadband India Forum.