Bharti Airtel
Limited
India & South Asia
Airtel Center, Plot No. 16,
Udyog Vihar, Phase-IV,
Gurugram - 122015

www.airtel.in
Call + 91 124 4222222
Fax + 91 124 4243252

TRAI/FY25-26/12
9th June, 2025

Lt. Col. Baljeet Singh Cheema
Joint Advisor (QoS 1)
Telecom Regulatory Authority of India,
World Trade Centre, Nauroji Nagar,
New Delhi – 110029

Subject: Bharti Airtel's Comments on TRAI Draft Manual on rating of properties under "Ratings of Properties for Digital Connectivity Regulation 2024"

Reference: TRAI's Draft Manual dated 13th May, 2025

Dear Sir,

This is in reference to TRAI's Draft Manual on rating of properties under "Ratings of Properties for Digital Connectivity Regulation 2024"

In this regard, we are pleased to enclose our comments on the said Draft Manual for your kind consideration.

Thanking You,

Yours' Sincerely,
For **Bharti Airtel Limited**

Rahul Vatts
Chief Regulatory Officer

Encl: a.a

Copy to:
1. Shri. Atul Kumar Chaudhary, Secretary, TRAI
2. Shri Tejpal Singh, Advisor, QoS, TRAI

Response to Draft Manual for Assessment of Digital Connectivity under Rating of Properties for Digital Connectivity Regulations, 2024

Preamble:

Airtel thanks the Telecom Regulatory Authority of India (TRAI) for the opportunity to offer its comments on the Draft Manual for Assessment of Digital Connectivity under the Rating of Properties for Digital Connectivity Regulations, 2024 ("Regulations").

Any TRAI rating mechanism for digital connectivity should ensure that such a system is designed to support telecom licensees in fulfilling their mandates. The mechanism should promote a fair market by ensuring that the costs of installing both active and passive infrastructure are allocated appropriately. Ultimately, it must lead to greater proliferation of telecom networks and drive meaningful improvements in connectivity outcomes.

The Regulations and the Draft Manual are intrinsically connected to TRAI's recommendations on *Introduction of Digital Connectivity Infrastructure Provider (DCIP) Authorization under Unified License (UL)* dated August 8, 2023. **It is our understanding that the Department of Telecom (DoT) has not yet adopted this proposed licensing framework.** In the previous consultation, Airtel had stated that ***"there is no justification for creating a new category under the UL for purposes of the DCIP and that the present licensing framework works well and effectively in terms of all the relevant elements of infrastructure, network and service duly disaggregated and in sufficient detail".***

Furthermore, the Model Building Bye Laws (MBBL) 2016 and the specific integration of the "Provisions for In-Building Solutions Digital Communication Infrastructure", introduced through the 2022 addendum, remains a work in progress across a number of States and UTs. The National Building Code is also presently being finalized by BIS and is not yet implemented.

The Draft Manual is to be placed on the regulatory foundation built by these associated regulations. Without having the benefit of regulatory clarity on these associated regulations, it is difficult to assess the pros and cons of the Regulation and the Draft Manual. Sufficient lead-time must be provided for States and UTs to fully enact these regulations, adapt their administrative processes, and allow stakeholders, such as property managers, developers, and telecom service providers, to align with the new requirements. **Once these foundational regulations have taken effect, a considered opinion can be provided by the industry after assessing the impact, benefits and challenges.**

That said, we wish to respectfully submit that the implementation of these regulations remains unclear at this stage. While the Draft Manual and Regulations lean heavily on a regulatory architecture involving entities like DCIPs, the current licensing ecosystem is not aligned to the

same. In the absence of any official notification or adoption of the DCIP authorization framework by the DoT, there remains ambiguity around who will actually operationalize several components of this framework in light of the extant licensing and regulatory framework for installation of active and passive elements. Without clear statutory authority or designated roles, the practicality of enforcing such a multi-layered compliance system is unclear.

Furthermore, regulatory frameworks must be grounded in practical realities**. A rating system that presumes uniform infrastructure and full cooperation among stakeholders can face execution challenges considering India's varied urban and rural environments.** There is a significant risk that the current approach could result in widespread rating failures, not due to any shortcomings on the part of operators, but because of systemic challenges. Despite a number of reforms related to Right of Way (RoW), the expansion of fiber networks face significant obstacles due to inconsistencies in implementation of RoW Rules at regional levels.

Telecom service providers (TSPs) face significant challenges in deploying In-Building Solutions (IBS) for government projects because telecommunications is often viewed by property owners as a commercial opportunity rather than an essential utility**.** In such cases, **Property managers typically auction IBS installation rights to a single infrastructure provider, who then charge high access fees to TSPs. This practice not only increases costs for TSPs but also undermines the idea of telecom as a universal public utility. In our view, TRAI should focus on ensuring that the cost of DCI is viewed as an intrinsic part of the cost of property development just as is the case of any other utility service like water, gas or electricity.** Our experience suggests that this understanding is woefully lacking among property owners/managers and the additional layer of a DCIP will further perpetuate the tendency to monetize telecom connectivity and costs being passed on to TSPs.

Without prejudice to the above, TRAI may consider the following recommendations to ensure market readiness:

1. **Obtain regulatory clarity on DCIP Authorization: It is important to take DoT's view on the implementation of the DCIP Authorization while also considering the views expressed by the industry in this matter.** Ultimately, the Regulation and DCI Rating mechanism should be consistent with the Telecommunications Act, 2023 and the overall licensing and authorization regime.
2. **Obtain regulatory clarity on associated regulations:** MBBL and NBC are critical components of the rating system. **It is important to have a public and inter-ministerial consultation where views of the Ministry of Housing and Urban Affairs and other key**

stakeholders are also taken into consideration, especially on the implementation of these regulations (MBBL and NBC) and alignment on cost allocation of DCI / IBS installation by Property Managers / Developers / Owners.

3. **Cost Allocation Principles: The current practice of monetizing telecommunications connectivity should be replaced by a principle where the full cost of telecom infrastructure installation is borne by the Property Owner or Manager.** This cost should be treated as an integral part of the overall project expenditure, akin to other essential utilities such as electricity, water, or gas. An awareness campaign is needed to dispel the misconception among Property Developers and Owners that IBS and passive telecom infrastructure are monetizable assets where costs can be passed on to TSPs.
4. **Macro infrastructure readiness and fiberization:** Macro telecom infrastructure such as **telecom towers and fiber networks are critical for ensuring that benchmarks established within the rating manual are achieved by the Property Manager.** TRAI and DoT must ensure that central and state policies / rules are aligned to achieve these objectives.

To this end, it is our submission that the Rating system should ensure overall reduction of costs for laying of telecom infrastructure for TSPs, ensure a level playing for licensees, facilitate non-exclusive/non-discriminatory access and lastly be consistent with the other related guidelines, regulations and the Telecom Act.

We hereby provide our inputs to the Draft Manual in the Annexure below, as per the required format.

Annexure – Template for submitting Comments or Feedback

Name of the Commentator / Organization: **Bharti Airtel Limited** (BAL)

We request TRAI to consider the overarching recommendations provided above. However, we are also providing the specific recommendations below in order to better optimize the rating system.

S.No.	Chapter of the Draft Manual	Clause / Para / Table / Figure No.	Comments / Suggested Modified Wordings	Justification for Proposed Change
1	Registration Process and Rating Lifecycle	3.5.vi	In addition to *No exclusive arrangement with the service providers,* the following may be added: ***Non-discriminatory access to Service Providers***	A property manager should provide non-exclusive and non-discriminatory access to Service Providers.
2	Assessment Methodology for Category 'A' Properties	4.7.2.iii Number of Mobile Service providers having coverage or integration with Digital Connectivity Infrastructure	It is understood that the RF coverage map and drive test and network performance test are to be conducted by the DCRA. In this case, the line "Network performance test results from multiple operators" should be substituted with ***Network performance test results of multiple operators to be conducted by the DCRA***	It is mentioned that "The DCRAs shall prepare and maintain the compliance summary in the following format". Accordingly, it should be made amply clear that the test should be done by the DCRA and no administrative burden should be passed on to the TSP.
3	Assessment Methodology for Category 'A' Properties	4.8.2. Sub-Criteria: Secure public Wi-Fi network coverage and performance in	The overall weightage assigned to this sub-criteria is '5'. The **same may be reduced** in comparison to the weightage assigned to	Mobile connectivity remains the primary mode of connectivity for subscribers. Mobile connectivity needs to be consistent and robust within an indoor

S.No.	Chapter of the Draft Manual	Clause / Para / Table / Figure No.	Comments / Suggested Modified Wordings	Justification for Proposed Change
		public areas of property	Mobile Network Coverage in 4.8.1.	environment in order for the subscriber to receive / make calls, receive / send SMSs and use mobile applications. The use case for Wi-fi is in limited situations and most users may not even opt-in for the service. Therefore, mobile connectivity cannot be treated at par with Wi-fi connectivity and assigned the same weightage.
4	Assessment Methodology for Category 'A' Properties	4.8.3. Sub-Criteria: Mobile network coverage and performance in non-public areas	The minimum download speed criteria is 10Mbps for 4G or 100 Mbps for 5G technology as applicable. The speed metrics should be modified in accordance **with a TSPs MRO criteria**: ***For 4G, throughput equal to or better than 2 Mbps, successful file download test cases in percentage.*** ***For 5G, 100 MB size is to be downloaded on each selected test location within 5 minutes.***	This will make the speed criteria consistent with a licensee's Minimum Roll-out Obligation (MRO) as per its License / Authorization.
5	Assessment Methodology for Category 'A' Properties	4.8.4. Sub-Criteria: Secure public Wi-Fi network coverage and	**The sub-criteria may be deleted.**	Non-public areas refer to spaces within offices, residences, and other establishments where general public access is

S.No.	Chapter of the Draft Manual	Clause / Para / Table / Figure No.	Comments / Suggested Modified Wordings	Justification for Proposed Change
		performance in non-public areas		restricted. In these zones, users depend on private networks that manage access and provide tailored security measures. Property owners or tenants may also choose to prohibit public Wi-Fi networks due to security and privacy considerations. Given these factors, it is neither practical nor appropriate to include this sub-criteria or assign any weightage to it.
6	Assessment Methodology for Category 'A' Properties	4.9.1. Sub-Criteria: User feedback on digital connectivity experience	The Assessment Methodology should include more criteria for ensuring **appropriate sample selection** and to **ensure that any biases are reduced** or eliminated altogether. The Survey should also ensure that **users understand the services they are rating and respond accordingly**. For example, while rating "Broadband Service Performance", it is unclear whether the user is rating the public wi-fi network or the private wi-fi network being used in an office or home environment.	User feedback forms often suffer from issues of subjectivity, bias and lack of understanding of the object of the survey. This can undermine the accuracy and usefulness of the insights gathered. The survey questionnaire should be designed accordingly.

S.No.	Chapter of the Draft Manual	Clause / Para / Table / Figure No.	Comments / Suggested Modified Wordings	Justification for Proposed Change
7	Assessment Methodology for Category 'B' Properties	5.5.2. Sub-Criteria: Number of Mobile Service providers having coverage or integration with Digital Connectivity Infrastructure	It is understood that the RF coverage map and drive test and network performance test are to be conducted by the DCRA. In this case, the line "Network performance test results from multiple operators" should be substituted with ***Network performance test results of multiple operators to be conducted by the DCRA***	It is mentioned that "The DCRAs shall prepare and maintain the compliance summary in the following format". Accordingly, it should be made amply clear that the test should be done by the DCRA and no administrative burden should be passed on to the TSP.
8	Assessment Methodology for Category 'B' Properties	5.6.2. Sub-Criteria: Secure public Wi-Fi network coverage and performance in public areas of property	The overall weightage assigned to this sub-criteria is '5'. The same **may be reduced** in comparison to the weightage assigned to Mobile Network Coverage in 5.6.1.	Mobile connectivity remains the primary mode of connectivity for subscribers. Mobile connectivity needs to be consistent and robust within an indoor environment in order for the subscriber to receive / make calls, receive / send SMSs and use mobile applications. The use case for Wi-fi is in limited situations and most users may not even opt-in for the service. Therefore, mobile connectivity cannot be treated at par with Wi-fi connectivity and assigned the same weightage.

S.No.	Chapter of the Draft Manual	Clause / Para / Table / Figure No.	Comments / Suggested Modified Wordings	Justification for Proposed Change
9	Assessment Methodology for Category 'B' Properties	5.6.3. Sub-Criteria: Mobile network coverage and performance in non-public areas	The minimum download speed criteria is 10Mbps for 4G or 100 Mbps for 5G technology as applicable. The speed metrics should be modified in accordance with a **TSPs MRO criteria:** ***For 4G, throughput equal to or better than 2 Mbps, successful file download test cases in percentage.*** ***For 5G, 100 MB size is to be downloaded on each selected test location within 5 minutes.***	This will make the speed criteria consistent with a licensee's Minimum Roll-out Obligation (MRO) as per its License / Authorization.
10	Assessment Methodology for Category 'B' Properties	5.6.4. Sub-Criteria: Secure public Wi-Fi network coverage and performance in non-public areas	**The sub-criteria may be deleted.**	Non-public areas refer to spaces within offices, residences, and other establishments where general public access is restricted. In these zones, users depend on private networks that manage access and provide tailored security measures. Property owners or tenants may also choose to prohibit public Wi-Fi networks due to security and privacy considerations. Given these factors, it is neither practical nor appropriate to

S.No.	Chapter of the Draft Manual	Clause / Para / Table / Figure No.	Comments / Suggested Modified Wordings	Justification for Proposed Change
				include this sub-criteria or assign any weightage to it.
11	Assessment Methodology for Category 'B' Properties	5.7.1. Sub-Criteria: User feedback on digital connectivity experience	The Assessment Methodology should include more criteria for ensuring **appropriate sample selection** and to **ensure that any biases are reduced** or eliminated altogether. The Survey should also ensure that **users understand the services they are rating and respond accordingly**. For example, while rating "Broadband Service Performance", it is unclear whether the user is rating the public wi-fi network or the private wi-fi network being used in an office or home environment.	User feedback forms often suffer from issues of subjectivity, bias and lack of understanding of the object of the survey. This can undermine the accuracy and usefulness of the insights gathered. The survey questionnaire should be designed accordingly.

----------END----------