

DG/COAI/REG/2025/1028

June 09, 2025

Shri Tejpal Singh, Advisor (QoS) – I Telecom Regulatory Authority of India, Tower F, NBCC World Trade Centre, Nauroji Nagar, New Delhi – 110029.

<u>Subject:</u> <u>COAI Response to TRAIs Draft Manual for Assessment of Digital Connectivity</u> <u>under Rating of Properties for Digital Connectivity Regulations, 2024</u>

Dear Sir,

This is with reference to Draft Manual for Assessment of Digital Connectivity under Rating of Properties for Digital Connectivity Regulations, 2024 issued by TRAI on May 13, 2025.

In this regard, please find enclosed COAI's Response to the Draft Manual for your kind perusal.

We trust our above submission would merit your kind consideration and look forward to your valued support on the same.

Thanking you in anticipation,

Sincere regards, Signed on: 09-06-2025 19:54:52 Digitally Signed by: Lt Gen Dr SP Kochhar DG COAI Signature Valid From: 2025-02-22 10:45:32 Valid To: 2026-02-22 10:45:32

Lt. Gen. Dr. S.P. Kochhar, AVSM**, SM, VSM, ADC, KIGA Former Signal Officer in Chief, Indian Army Fellow IETE, Fellow AIMA, Member IEEE, Sr. Member CSI

Director General Email id: dg@coai.in

14, Bhai Veer Singh Marg, New Delhi – 110 001

tel: +91-11-23349275 fax: +91-11-23349276 email: contact@coai.in website: www.coai.in



Copy to:

1. Shri Pushpendra Kumar Singh, Pr. Advisor (CA, QoS, IT), TRAI, Tower F, NBCC World Trade Centre, Nauroji Nagar, New Delhi – 110029.

14, Bhai Veer Singh Marg, New Delhi – 110 001

tel: +91-11-23349275 fax: +91-11-23349276 email: contact@coai.in website: www.coai.in



We thank the Authority for providing us the opportunity to respond to the draft manual for assessment of Digital Connectivity under rating of properties for Digital Connectivity Regulations 2024.

1. Prime Onus should be on Property Managers

- a) Property managers is the primary beneficiaries of building ratings—gaining enhanced marketability, the ability to command premium rents, improved tenant retention—there is a compelling case for them to bear the costs associated with rating of buildings. This financial responsibility is a logical extension of their vested interest; the tangible advantages they accrue directly justify the investment in certification. Furthermore, ensuring robust digital connectivity, a critical prerequisite for modern building functionality and tenant satisfaction, falls naturally within the property manager's operational purview. Specifically, the property manager should be obligated to allocate and maintain adequate space within the building for Telecom Service Providers (TSPs) to install essential interconnection infrastructure in a non-discriminatory and non-exclusive arrangement basis. Consequently, it should be incumbent upon the property manager to fund and execute the rating process while proactively securing and maintaining all necessary digital infrastructure—including provisions for TSP access—to achieve and sustain a certified rating.
- b) If digital infrastructure is laid out and connectivity is made available, it would give assurance to the consumers while going for purchase or for using the said building/premise. This will help the Property Managers of the said building/premises to build more trust with the consumers and also influence the consumer's choices. The building/premise with better digital connectivity will always be preferred more by the consumers as compared to the ones having lesser connectivity. Thus, the Rating framework 'Creates Value' for the Property Managers instead of 'Value Capture' for property manager or for TSPs.
- c) As the Authority has recommended that the Government buildings should mandatorily come under the Rating framework, it should ensure that there should not be a reverse pressure on TSPs/ISPs to absorb the cost of provisioning the digital connectivity infrastructure or digital connectivity or repair/maintenance etc for Government buildings or for buildings of



d) TSPs encounter considerable difficulties when implementing IBS for government projects because property owners often perceive telecommunications not as a fundamental utility but as a commercial venture. In these situations, property managers usually grant exclusive IBS installation rights through auctions to a single infrastructure provider, who then imposes steep access fees on TSPs. This approach not only escalates costs for TSPs but also contradicts the principle of telecommunications as a universal public utility. We believe that the TRAI should emphasize recognizing the cost of DCI as an inherent component of property development expenses, similar to essential utilities like water, gas, or electricity. Our experience indicates that property owners and managers generally lack this perspective, and introducing an additional DCIP layer will likely reinforce the trend of commercializing telecom connectivity, ultimately burdening TSPs with higher costs. To address the widespread misconception among property developers/owners/managers, a targeted awareness campaign and policy clarity is necessary.

2. Reduce weightage for Public Wi-Fi

- a) The focus area of the manual is on Buildings and not all residential buildings have open spaces where commercial Wi-Fi connectivity can be made available. The primary mode of connectivity will remain mobile and fixed line services. The limited Wi-Fi availability in open spaces of residential buildings will pertain to the building's own Wi-Fi that is not used by even the residents and is used instead by building officials and work force. Moreover, with advanced mobile technologies (4G/5G) providing good data speed, the very utility of using public Wi-Fi for data consumption is diminishing and the rating framework should not encourage any inefficiencies. Further, if mobile coverage is addressed inside buildings/premises, there will be no need left for users to latch to public Wi-Fi. In this context, the weightage given to Wi-Fi in rating of buildings seems out of place. Further, limited adoption of public Wi-Fi is also evident from the lack of success of PM-WANI as its adoption rate is far below the NDCP 2018 target of 10 million. Thus, it seems illogical to give equal weightage to this medium in rating of buildings and we request the TRAI to address this anomaly.
- b) Further, user preferences are increasingly shifting towards personalized and secure internet access. Since Public Wi-Fi is a shared resource, it is also often perceived as less secure as compared to personal mobile data connections, making telecom networks as the natural choice of subscribers. Moreover, with advancements from 2G, 3G, 4G, and 5G, and discussions around 6G, telecom networks now provide faster, more reliable internet access, making public Wi-Fi increasingly unnecessary.



c) Given these demonstrated shifts in user behaviour, technological superiority, and security perceptions, public Wi-Fi no longer represents a critical differentiator for modern buildings/premises. Rating systems should accordingly reflect this reality by assigning substantially reduced weightage to public Wi-Fi provisions, reallocating scoring emphasis to more relevant connectivity solutions like robust telecom infrastructure and seamless 4G/5G availability and 5G/6G readiness.

3. Designing a Fair and Effective Digital Connectivity Rating Mechanism

- a) we submit that any such Digital Connectivity Rating mechanism, if at all pursued, must be thoughtfully designed to align with the operational realities and obligations of telecom licenses.
- b) It should incentivize building developers and property owners to facilitate and bear the costs for the deployment of telecom infrastructure and coverage availability.
- c) Such an approach would ensure that telecom licensees are not unfairly burdened with the cost of connectivity deployment, especially in high-rise buildings, basements or gated complexes where infrastructure access is often restricted.

4. Need for Regulatory Clarity and Inter-Ministerial Alignment

- a) For any digital connectivity rating mechanism to be effective and sustainable, it is essential to obtain regulatory clarity on key frameworks that directly impact its implementation. This includes the Department of Telecommunications' (DoT) position on the proposed Digital Connectivity Infrastructure Provider (DCIP) Authorization, as well as broader alignment with the licensing and authorization provisions under the Telecommunications Act, 2023.
- b) In parallel, there is a pressing need to clarify how other associated regulations, particularly the Model Building Bye-Laws (MBBL) and the National Building Code (NBC) will be aligned and operationalized in the context of the rating system. In the absence of such feedback and alignment, the entire exercise would be rendered ineffective and ultimately meaningless.



5. Phased approach as per the TRAI Recommendation on rating of buildings.

a) The Authority, in para 3.4.5(a) on page 158 of TRAI's Recommendations on 'Rating of Buildings or Areas for Digital Connectivity' dated February 20, 2023, has deliberated upon the need for mandatory ratings while finalizing the recommendation 35 and 36 summarized in Chapter 5. The same is reproduced below-

"As discussed above, there are certain Buildings with high public footfalls such as airports, ports, railway stations, public transport stations, bus stations, large shopping complexes, industrial estates, major market areas, office or workplaces, Government Buildings, Government residential colonies and multi-storeyed complexes (residential or office complexes) etc. In such cases it is essential to have certain framework to ensure good quality digital connectivity experience to the consumers or end users of various services. In many cases end users may be a transit passenger or short time visitor, who might not be owning a permanent space in that area but during the period of his/her stay he/she needs to have good quality digital connectivity experience so as to ensure that his/ her connectivity related requirements are fulfilled without any hassle. Thus, such Buildings are required to have a mandatory rating scheme. In case of such Buildings, Rating should be made mandatory within two years of issue of the regulatory framework by TRAI or two years from obtaining occupancy certificate, whichever is later."

- b) In this context, we strongly recommend adopting a phased implementation approach, beginning with high-priority, high-footfall properties where the potential impact of improved digital connectivity is both immediate and substantial. This targeted focus will allow the rating framework to mature gradually while concentrating efforts where they are most needed.
- c) As highlighted earlier, the market currently lacks the readiness for universal implementation of building ratings due to capacity, regulatory, economic, and behavioural constraints.
- d) Therefore, a **phased and prioritized approach**, beginning with high-impact buildings, led by property managers, and aligned with current user behaviour and connectivity trends, is essential for the effective and sustainable implementation of building ratings.

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1	2	Clause 2.3 TSPs are entities responsible for delivering a wide range of telecommunications and digital services, including mobile and fixed-line communication, internet access, and broadband services. They serve as the backbone of digital connectivity, ensuring seamless and reliable communication for end-users. Their role is	Modified clause: The following should be added to clause 2.3 "No service provider shall enter into an exclusive arrangement or tie-up arrangement with any property manager for development or access of digital connectivity or digital connectivity infrastructure in their property "	The TSP's role has to be as per the Regulation No. 23 of the Regulation dated 25 th October 2024.
		critical in maintaining and improving the overall quality of digital services, directly impacting the user experience and the effectiveness of digital infrastructure. The TSPs are encouraged to collaborate with the property managers and DCIPs for extending and maintenance of digital connectivity in the properties.		
2	3	Clause 3.2 Registration process of DCRA.	The following clause should be added in clause 3.2 covering the aspect of registration process of DCRA <i>"The registration process of DCRA or any review thereafter, should also involve evaluation of their application by an Empowered Committee, which should also</i>	As a major part of the rating framework would be to set up digital connectivity infrastructure and connectivity, from mobile and wireline broadband point of view, it is important that a collaborative approach is adopted and TSPs are also involved in examining the registration of DCRAs. The technical experts from TSPs can

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			include Technical experts from	provide rich insights during
			TSPs."	evaluation process as well as
				subsequently during any review of
				the working of any DCRA.
3	3	Clause 3.5,	We suggest addition of Point ix	As stated in the point 1 of the
			as below-	preamble above, we reiterate that
		General Obligations for Property Manager-		digital connectivity is now
			The responsibility for bearing the	considered a basic utility, like water
			cost of establishing network	and electricity, and should be part
			infrastructure, power and	of a property's essential
			associated equipment should rest	infrastructure. As the Rating will
			with the property manager.	create Value for the Property
				Managers, they should be
				responsible to bear the cost for
				establishing and augmenting the
				infrastructure, equipment etc, for
				ensuring suitable coverage
				availability.
4	3	Clause 3.6,	As mentioned in TRAI's	As stated in point 5 of the preamble,
			recommendations, we reiterate that	we reiterate that properties should
		Classification of Properties for Rating	properties should be classified with	be classified with priority given to
		Table 3.1	priority given to buildings having	buildings having higher footfall.
			higher footfall.	

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_	4	T-61- 4.00	Over we study that we have to see fail	The new in cost white we had a fit
5	4	I adie 4.39	Suggested change is as follows:	I ne gap in weightage between the
				presence of two Service Providers
		Scoring Criteria	Weightage 8.5- If 3 or more internet	and three Service Providers should
			service providers have integration	be sufficiently significant to
		Weightage 7.5- If 3 or more internet service	with DCI in the property with active	encourage the provisioning of
		providers have integration with DCI in the	service subscription.	connectivity by at least three SPs.
		property with active service subscription.		
			Weightage 4 - If a minimum of 2	
		Weightage 5- If a minimum of 2 internet service	internet service providers have	
		providers have integration with DCI in the	integration with DCL in the property	
		property with active service subscription	with active service subscription	
		Weightere 2 If at least one internet convice	Weightage 2. If at least one internet	
		weightage 2- If at least one internet service	veignage 2- if at least one internet	
		provider has integration with DCI in the property	service provider has integration with	
		with active service subscription.	DCI in the property with active	
			service subscription.	
6	4	Table 4.1, Clauses 4.8.1 and 4.8.2	Suggested change is as follows:	The primary objective of digital
				infrastructure within a property is to
		Mobile network coverage and performance in	Mobile network coverage and	provide reliable connectivity to its
		public areas of property (Weightage – 5)	performance in public areas of	occupants, not to serve the general
			property (Weightage- 8)	public. There is no justification for
		Secure public Wi-Fi network coverage and		introducing an additional layer of
		performance in public areas of property	Secure public Wi-Fi network	Public Wi-Fi beyond existing mobile
		(Weightage – 5)	coverage and performance in public	and broadband services.
			areas of property (Weightage-	
			<u>2</u>).	

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				Furthermore, as stated in point 2 of the preamble, we reiterate that with the widespread availability of affordable 4G and 5G data for subscribed users, the relevance of public Wi-Fi has significantly diminished.
7	4	 Clause 4.8.1 <u>Sub-Criteria</u>: Assessment Methodology- a) Assess data speed and voice call quality over a day (preferably 10 am to 8pm with samples uniformly distributed covering peak hours in property) using test probes for each service provider whose coverage is available on the property and accounted under criteria 7- <i>Availability of Service Providers'</i>. Measurements to be carried out shall include peak as well as off-peak hours. 	Assess data speed and voice call quality over a day (preferably 10 am to 8 pm with samples uniformly distributed covering peak hours in property) using TRAI Myspeed App or other speed testing devices for each service provider whose coverage is available on the property and accounted under criteria 7- Availability of Service Providers'. Measurements to be carried out shall include peak as well as off-peak hours. Test probes are not possible at TSPs end instead cell level KPIs can be checked.	TRAI Myspeed App may be used to assess data speed.

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8	4	Table 4.47, <u>Technical Benchmarks</u> - Minimum downloadspeed of 10Mbps for 4G or 100 Mbps for 5Gtechnology as applicable.	<u>Technical Benchmarks</u> - The minimum download speed requirements for 4G and 5G technologies should be aligned with that of MRO guidelines.	The minimum download speed requirements for 4G and 5G technologies should be aligned with that of MRO guidelines.
9	4	Clause 4.8.3 (v) S. No. 2.of the Table 4.47 <u>And</u> Clause 5.6.3 (v) S.No 2.of Table 5.37 <u>S.No.</u> <u>Weightage</u> 2. 3 <u>Compliance</u> <u>requirement</u> If at least 2 service providers have more than 70% mobile coverage for their latest generation of technology in non-public areas (including lifts and basements) with average minimum download speed of 10Mbps for 4G or 100 Mbps for 5G technology as applicable.	Modified serial no. 2 should be as follows: If at least 3 service providers have more than 60% mobile coverage for their latest generation of technology in non-public areas (including lifts and basements) with average minimum download speed of 10Mbps for 4G or 100 Mbps for 5G technology as applicable.	It is imperative that adequate service providers coverage is made available, to ensure universal connectivity.

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10	A		The cub exiterie may be deleted	Non nublic croce refer to croce
10	4	Clause 4.0.4.	i ne sub-criteria may be deleted.	inon-public areas reler to spaces
				within offices, residences, and
		Sub-Criteria: Secure public Wi-Fi network		other establishments where
		coverage and performance in non-public areas		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 include this sub-
				criteria or assign any weightage to
				it.
11	4	Table 4.41(2)	In the weightage for "If at least two	It is imperative that adequate
		And	mobile service providers have	service providers coverage is made
		Table 5.31(2)	integration with DCI in the property	available, to ensure universal
			or more 75% coverage in indoor	connectivity.
		S. Weightage Compliance	areas" the weightage of '5' to be	
		No. Requirement	reduced to '3'	
		2. 5 If at least two mobile		
		service providers have		
		integration with DCI in the		
		property or more 75%		
		coverage in indoor areas		

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12	5	Table 5.37,	Technical Benchmarks- The	The minimum download speed
			minimum download speed	requirements for 4G and 5G
		Technical Benchmarks- Minimum download	requirements for 4G and 5G	technologies should be aligned with
		speed of 10Mbps for 4G or 100 Mbps for 5G	technologies should be aligned with	that of MRO guidelines.
		technology as applicable.	that of MRO guidelines.	
13	5	Clause 5.6.4.	The sub-criteria may be deleted.	Non-public areas refer to spaces
				within offices, residences, and
		Sub-Criteria: Secure public Wi-Fi network		other establishments where
		coverage and performance in non-public areas		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 include this sub-
				criteria or assign any weightage to
				it.

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11	44	Clause 11.2 seriel no. 10.52	This should be severed under the	As stated in point 1 of the
14	11	Clause 11.3, senai no 49-53	This should be covered under the	As stated in point i of the
			Clause 3.5 (General Obligations	preamble,
		Documentation	for Property Manager).	<i>"a critical prerequisite for modern</i>
				building functionality and tenant
		1. Updated network diagrams	The Property Manager should be	satisfaction, falls naturally within
		2. Future expansion plans	responsible for obtaining these	the property manager's operational
		3. Photographs of installed latest generation	documents, either directly or	purview", the Property Manager
		mobile connectivity equipment	through a third party.	should be responsible for obtaining
		4. Network integration certificates/test reports		these documents, either directly or
		5. RF coverage map in the property or		through a third party. This obligation
		walk/drive test results		should not be transferred to the
		6. RF coverage map of public areas		Telecom Service Providers (TSPs).
		7. Speed test logs and call quality reports		
		8. Wi-Fi coverage maps and speed test		
		results		
		9. Wi-Fi security audit reports		
		10. Wi-Fi security certifications		
		11. Speed test results with timestamps		