

DIPA/2025/0077

9th June, 2025

Lt. Col. Baljeet Singh Cheema,
Joint Advisor, (QoS-I)
Telecom Regulatory Authority of India
4th, 5th, 6th & 7th Floor, Tower-F,
World Trade Centre, Nauroji Nagar,
New Delhi: 110029

Subject: DIPA's Comments on TRAI's Draft Manual for Assessment of Digital Connectivity under the Rating of Properties for Digital Connectivity Regulations, 2024, dated 13th May 2025.

Respected Sir,

Greetings from Digital Infrastructure Providers Association (DIPA) !!

1. We, at DIPA, extend our sincere appreciation to the Telecom Regulatory Authority of India (TRAI) for the opportunity to provide our comments on the Draft Manual for Assessment of Digital Connectivity under the Rating of Properties for Digital Connectivity Regulations, 2024. We also commend TRAI's continued commitment to advancing the Digital India mission, meaningful connectivity and addressing the digital divide.
2. Acknowledge TRAI's recognition for the pivotal role played by Infrastructure Providers (IP-I) in enabling 4G/5G rollouts and promoting infrastructure sharing to maintain affordable telecom services under the 'Rating of the Building Regulation 2024' vide their regulation dated 25th October 2024. However, in its response to the DoT's back-reference, TRAI has pointed out that a key reason for inadequate digital connectivity inside buildings is the limited participation of IPs in areas with low business potential, creating situations that result in monopolistic setups when exclusive rights are granted to a single provider. This contradictory representation creates confusion and fails to offer a clear and consistent stance from the TRAI. A more aligned and coherent approach would not only support the IP-1 ecosystem but also help in achieving the shared goal of robust digital infrastructure across the country.
3. We believe that, fundamentally, any regulatory framework (whether assessing property ratings for digital connectivity or otherwise) should be designed to support the orderly growth of the telecom sector. It should promote a fair market by providing a level playing field, ensuring that investments made under the current regulatory and legal framework are not negatively affected. Therefore, any regulatory proposals should be grounded in a comprehensive regulatory impact analysis (RIA) and should ultimately support the cost of doing business for meaningful connectivity in buildings, properties, and across India.

We, the Digital Infrastructure Providers Association (DIPA), formerly known as the Tower and Infrastructure Providers Association (TAIPA), are the apex representative body of the India's digital infrastructure industry that develop, build, own and operate the nation's wireless infrastructure.

The telecommunications sector has always been a key driver of our economy, which has always brought immense benefits in both – short term and long term. The Indian Telecom Sector plays host to ~1.2 billion mobile users, garnering a tele-density of 84.5%, ~8.23 lakh mobile towers, and ~29.8 lakh BTS; with OFC rollout crossed ~41.9 Lakh Kms as of Feb 2025 which enables connectivity to ~950 million broadband users.

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4. We respectfully submit that the draft manual is premature, given that TRAI's foundational recommendations dated 20.02.2023 and 08.08.2023 ("Rating of Buildings or Areas for Digital Connectivity" and "Introduction of Digital Connectivity Infrastructure Provider (DCIP) Authorization under Unified License (UL), respectively) are still under consideration by the Department of Telecommunications (DoT). Proceeding with implementation before final decisions are made risks undermining regulatory and legal coherence, as well as stakeholder trust. In view of the foregoing communications between DoT and TRAI, IP-1 industry is finding it difficult to provide concrete comments on the Draft Manual for Assessment of Digital Connectivity under the Rating of Properties for Digital Connectivity Regulations, 2024, as desired.
5. In the interim, some of the very high-level Inputs, on the draft manual are as follows:
 - I. **Definition of Digital Connectivity Infrastructure (DCI):** The definition of DCI used in the manual is yet to be approved by DoT and remains under revision. Its inclusion in the draft manual is therefore premature.
 - II. **Unregulated Ownership and Access:** Clauses assigning DCI ownership and maintenance to 'Property Managers'—entities not governed by DoT—raise serious concerns about regulatory oversight, accountability and operational boundaries. The introduction of entities such as 'Property Manager', 'DCRA', and 'DCIP' without explicit acceptance by the government (DoT, MoHUA, RERA, and BIS) undermines the existing ecosystem and Regulatory framework.
 - III. **Security and Operational Risks:** Delegating telecom infrastructure responsibilities to unregulated entities poses significant cybersecurity and operational risks, especially in light of the Telecommunication Act, 2023.
 - IV. **Jurisdictional Overreach:** The proposed property rating mechanism appears to extend beyond TRAI's statutory mandate under the TRAI Act, 1997, potentially encroaching into real estate regulation and diluting TRAI's core focus.
 - V. **Contradiction with DoT's Reform Agenda:** The draft manual introduces procedural complexities that contradict the DoT's ongoing efforts to simplify regulatory processes and promote ease of doing business.
 - VI. **Lack of Stakeholder Engagement:** Despite stakeholders' concerns, TRAI has proceeded with workshops and webinars on implementation, even as DoT approval cum acceptance remains pending and also, pending from other related ministries/departments. This undermines the consultative process and stakeholder confidence.
6. **In view of the above submissions, we urge TRAI to:**
 - Ensure alignment with the Current Legal & Regulatory framework (Telecommunications Act 2023 and TRAI Act 1997) and the telecom sector's operational realities.
 - Recognize the role of IP-1 registrants in its present form in the sustainable growth of India's telecom infrastructure.

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- It may be prudent to await the formal endorsement of the foundational recommendations by the DoT and associated authorities before proceeding with the implementation of the draft manual.

We respectfully submit that TRAI may kindly consider the above comments on the draft manual, for further deliberation and refinement. We believe that a more inclusive, legally and strategically aligned approach would better serve the long-term objectives of India's telecom sector and the Government's policy vision.

We remain committed to working collaboratively with TRAI and other stakeholders to ensure that regulatory initiatives are effective, inclusive, and future-ready.

Thanking you.

Yours sincerely,
For Digital Infrastructure Providers Association



(Manoj Kumar Singh)
Director General

CC:

1. Shri Tejpal Singh, Advisor (QoS-I), TRAI

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