

## Comments or Feedback on Draft Manual for Assessment of Digital Connectivity under Rating of Properties for Digital Connectivity Regulations, 2024

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| S.No. | Chapter of the Draft Manual                                     | Clause/ Para/ Table/ Figure No. of the Draft Manual | Comments/ Suggested modified Wordings  | Justification for Proposed Change   |
|-------|---|---|--|---|
| 1     | 5.2 Digital Connectivity Infrastructure Resilience (Category B) | 5.2   | Incorporation of <b>Climate Change Risk Assessment (CCRA)</b> within the DCI resilience evaluation framework. The assessment may include identification of location-specific climate risks (such as flooding, heatwaves, or high wind zones) and <b>supporting documentation on mitigation measures</b> undertaken—such as ingress protection, elevation of critical equipment, or provision of redundant systems—to ensure continuity of digital connectivity infrastructure. | Adding climate risk integration strengthens the resilience layer for DCI in Category B properties, ensuring that infrastructure is robust against environmental hazards. This aligns with global best practices and supports business continuity for occupants, especially as climate-related disruptions increase. |
| 2     | 4.3/5.1 Provision in power infrastructure                       | 4.5 & 5.1   | Inclusion an <b>Energy-Efficiency Score</b> for DCI infrastructure.  | Encouraging energy-efficient DCI supports sustainability goals and reduces operational  |

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|       | for ensuring reliable digital connectivity (Category A & B)      |   | Require annual <b>energy audits</b> of digital connectivity equipment and incentivize use of <b>green power</b> sources (e.g., solar, wind), smart HVAC, and load optimization.   | costs. It also aligns with the manual's emphasis on future-readiness and responsible development, and helps <b>businesses meet ESG</b> (Environmental, Social, Governance) requirements.   |
| 3     | 4.5/5.3 Future Readiness of Digital Connectivity Infrastructure  | 4.5/5.3   | May mandate periodic Digital Readiness Checks by <b>accredited third parties</b> . Checks should validate compatibility with emerging technologies (e.g., 5G/6G, IoT), scalability, and cybersecurity posture. Require submission of third-party audit reports as part of the rating process. | Mandatory digital readiness checks ensure that properties remain future-proof and usable as technology evolves. <b>Third-party audits</b> provide credibility and actionable insights, supporting both regulatory compliance and business competitiveness. |
| 4     | 4 & 5 Assessment Methodology for Category 'A' and 'B' Properties | <b>New Annexure or Appendix;</b> Reference in relevant assessment sections (e.g., 4.8, 5.6 Service Performance) | Inclusion of a dedicated <b>annexure listing standard instruments/app required</b> for testing digital connectivity parameters (e.g., spectrum analyzers, network   | This will enhance clarity for assessors, ensure uniformity in measurement, and help all stakeholders understand the expected tools for compliance and verification. It aligns with best practices in technical standards documentation and                 |

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|       |   |  | analyzers, signal strength meters, latency testers, cable testers, power quality analyzers, Wi-Fi analyzers, etc.). Reference this annexure in each relevant assessment step. | supports transparent, credible ratings   |
| 5     | 4.1, 4.2, 4.3, 5.1, 5.2, etc. (Compliance to Standards) | Add cross-reference table or appendix after 11.2 (List of Applicable Standards and References) | Insertion of a cross-reference table mapping each assessment parameter or criterion to specific sections/clauses of relevant standards (e.g., MBBL, NBC, etc).                | This will make it clear exactly which standard or clause applies, ensuring precise compliance and easier audits. |