RJIL/TRAI/2025-26/453
9th June 2025

To,

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

Subject: **RJIL's comments on TRAI's Draft Manual for Assessment of Digital Connectivity under Rating of Properties for Digital Connectivity Regulations, 2024.**

Dear Sir,

Please find enclosed the comments of Reliance Jio Infocomm Limited (RJIL) on the TRAI's **Draft Manual for Assessment of Digital Connectivity under Rating of Properties for Digital Connectivity Regulations, 2024** dated 13.05.2025.

Thanking you,

Yours Sincerely,
For **Reliance Jio Infocomm Limited**

KAPOOR SINGH GULIANI

Digitally signed by KAPOOR SINGH GULIANI
Date: 2025.06.09 17:49:53 +05'30'

Kapoor Singh Guliani
Authorized Signatory

Enclosure: As above

Reliance Jio Infocomm Limited's comments on TRAI's Notice Inviting comments on "Draft Manual for Assessment of Digital Connectivity under Rating of properties for Digital Connectivity Regulations, 2024" dated 13th May 2025

Preface:

1. Reliance Jio Infocomm Limited (RJIL) thanks the Authority for giving an opportunity to offer comments on the **Draft Manual for Assessment of Digital Connectivity under Rating of properties for Digital Connectivity Regulations, 2024**.

2. We reiterate our previous comments on the subject that the first task should be to smoothen several bottlenecks preventing roll out of digital infrastructure, as this is a prerequisite for popularizing the rating of buildings for digital infrastructure and to ensure organic adoption of the process.

3. The Authority has been rightfully recognizing the role and importance of Digital Connectivity Infrastructure ('DCI') and In-Building Solutions ('IBS') and the need for non-discriminate Right of Way ('ROW') to buildings at the costs prescribed in Telecommunication Act, 2023 and RoW rules, and we hope that this translates in easing the bottlenecks for installing DCI.

4. The Authority has rightly added the compliance with National Building Code ('NBC'), Model Building Bye Laws ('MBBL') and other relevant regulations in rating mechanism, but we understand that the provision for DCI should also be included as part of these regulation and approvals, as this will be critical to provide a legal backing to the digital connectivity and rating of buildings eco-system.

5. We reiterate our submission that the DCI implementation should be backed by the law. For instance, RERA act does not cover DCI at present. Mandating digital connectivity inside the buildings and ensuring that this is available to **all licensed Telecom Service Providers** on non-discriminatory basis should be incorporated in the Model builder-buyer agreement prescribed by RERA for covering it under the jurisdiction of this Act and its enforceability by the RERA.

6. We believe that with the implementation of Regulation for Rating of buildings, necessary impetus will be given to inclusion of the requisite DCI in the building plans for new buildings, while simultaneously incentivizing the property managers of the older buildings to provide RoW permission to TSPs to install DCI so that their building value can improve. **This Manual and the Regulation will help create an ecosystem for planning, designing, installation and rating of DCI on the similar lines as is being done in case of civil and electrical engineering works.**

7. Therefore, it is all the more relevant that the provisions for setting up the Advisory Committee are invoked urgently and a committee consisting of relevant stakeholders including representative from academia, Ministry of Housing and Urban Affairs (MoHUA), DoT, CoDCI, BIS, TSPs/ISPs, Multi-System-Operators(MSOs),CREDAI, etc. to advise on the matters related to proliferation, popularisation and adoption of rating framework, should be formulated at the start of the process itself. We reiterate that rating of buildings being a new concept, the Authority should leverage all possible support to popularize the same at initial stage itself.

8. In several instances, property managers of high-footfall buildings—such as airports, metro stations, bus terminals, railway stations, hospitals, Government buildings and other large public infrastructure—have granted exclusive Right of Way (RoW) permissions either to independent IP-1/VNO operators or to **their own affiliated entities holding IP-1 registration or a VNO license**. This practice effectively undermines the principle of non-discriminatory access by restricting TSPs/ISPs from directly accessing such premises. **It allows certain intermediaries to monopolize RoW rights and impose exorbitant charges on TSPs for network deployment.**

9. Such arrangements are in violation of the provisions of the Telecommunication Act, 2023, and the RoW Rules, which entitle every licensed operator or spectrum holder to independently seek RoW permissions from public authorities. These authorities are obligated to grant such permissions at standardized rates prescribed under the RoW Rules.

10. Therefore, while finalizing the **"Manual for Assessment of Digital Connectivity under Rating of Properties for Digital Connectivity Regulations, 2024"**, it is imperative for the Authority to ensure that the **framework does not become a tool for property managers to either deny RoW permissions or compel TSPs to lease infrastructure installed by a particular entity—whether that entity is independent or affiliated with the property manager.**

RJIL submissions on key provisions of the Manual

A. Role of Telecom Service Providers

11. We agree that the effective deployment of best-in-class DCI in the buildings can only be done through a collaboration between Property Managers and Telecom Service Providers (TSPs) and/or IP-1 providers acting at the behest of TSPs. However, the rating of buildings will be sole responsibility of the Property Managers and TSPs have no obligatory role in delivering the same, though they can support in installation of equipment and provide the connectivity.

12. Therefore, the provisions of the manual cannot be a binding obligation on the TSPs such as to facilitate surveys or other activities required for rating of buildings. Further, as per the license provisions, the TSP's mandatory coverage requirements are limited to the roll-out obligations and the manual cannot change the coverage parameters as an obligatory one. Therefore, we submit that all measurements of coverage for rating of buildings cannot be made as obligatory for TSPs, and the Property Manager should be solely responsible for providing the Right of Way permission to TSPs/ISPs and co-ordination of installation of DCI and IBS.

13. Further, under the table for compliance requirements in the manual, the minimum download speed of 10Mbps for 4G or 100 Mbps for 5G technology is mentioned for compliance requirements. We submit that these limits are not in line with the TSTPs for coverage testing and the Manual should be revised to align with TSTP minimum download speed for coverage testing. Further, any mandation of such coverage tantamount to amendment to license conditions and terms of NIA. Therefore, the building readiness should be limited to providing permission and infrastructure which is related to building and must not include the actual coverage/connectivity of the building.

B. Role of Property Managers

14. It is submitted that the manual should clearly spell out that all cost obligations pertaining to the rating of buildings or enhancing the DCI infrastructure in the property will solely lie with the property managers (including buiders in the construction phase). The property managers can align with the TSPs or TSP's contracted IPs for planning and execution of DCI enhancement at mutually agreed commercial arrangements. In case, the the parties are not able to agree to mututal agreement, the building managers must provide the permissions at the rate prescribed under the RoW rules. This way, the rate prescribed in the RoW rules acts as ceiling rates for building managers at which they must provide the permission to the TSPs/ISPs.

15. Further, there should be enforceable provisions to prevent Property Managers from entering into exclusive arrangements with a TSPs or an IP. The DCI infrastructure in a building or property should be available in non-discriminatory manner to all service providers of fixed and mobile connectivity. The Property Manager's responsibilities will include to ensure the permissions are available to each operator licensed to provide mobile or fixed line service.

16. As submitted earlier, in line with Singapore and European countries model, the requirement of interoperability in last mile network infrastructure should be adopted as a best practice. Thus, the DCI, if installed by the Property Managers should be

interoperable and compatibility with all TSPs/ISPs and should be available at the cost basis. The end customer should have the option to toggle between the network providers. This will ensure that TSPs directly or through Ips/DCIPs and Property managers create and maintain the DCI which can be utilized by all TSPs as per the customer requirements.

C. Role of secure Public Wi-Fi

17. As per the Regulations, Category-A buildings consist of Residential Apartments, independent houses, gated communities or societies, etc.; All properties of the Central Government, the State Government, Courts, Public Sector Undertakings, Local Bodies, Heritage Sites, etc.; buildings Commercial office complex, shopping malls, industrial estates, SEZs, multi-modal logistic parks, convention centres, etc. We understand that a majority of these buildings will be residential buildings or standalone buildings and there will be no relevance of secure public Wi-Fi in these buildings as in most buildings the public Wi-Fi will not be available and the Fixed Service (with indoor Wi-Fi) and mobile services will be the only modes of connectivity.

18. Thus, inclusion of secure Wi-Fi is an unnecessary inclusion in rating criteria. Further, with rising proliferation of affordable mobile as well as fixed line broadband services, the availability of public Wi-Fi is no more an essential service, and therefore not relevant for the purpose of rating of building.

19. Similarly, the inclusion of secure Public Wi-Fi is non-public areas, under Assessment Methodology for Category 'A' properties is unnecessary. As in non-public areas, the availability of Wi-Fi will be a function of the property users' choice and may lead to unnecessarily skewed ratings that will not reflect the actual status of DCI in buildings.

D. Inclusion of Fixed Wireless Access Services in Fixed connectivity

20. We submit that Fixed Wireless Access (FWA) is fast emerging as leading fixed line connectivity technology across the country. FWA overcomes the challenges of the ROW approvals and costs and would be instrumental in meeting national targets for fixed line penetration. Therefore, it is imperative that this is included in the Assessment Methodology for Category 'A' properties. Further, the RoW permission by building owners must also include the permission to install external antennas at rooftop or balconies of the buildings and availability of power to such external devices mounted on rooftop/balconies.

E. Criterion Assessment Methodology for Category 'A' properties

21. The following revised criterion with justification is provided below to include all the submissions is previous paras.

Criteria No.	S. No. (as per regulation)	Criteria (a)	Weightage (b)	Sub-Criteria (c)	Sub-Criteria weightage (Revised)	Justification
4.1	1	Compliance to applicable Model Building Bye Laws (MBBL) and National Building Code (NBC) for digital connectivity	5	4.1.1 Approved DCI design	2.5	No Change
				4.1.2 DCI implementation as per approved DCI design	2.5	No Change
4.2	2	Provision in civil infrastructure, over and above MBBL and NBC requirements, for ensuring robust digital connectivity	5	4.2.1 Provision for expansion of telecom rooms and cable pathways	2	No Change
				4.2.2 Provision for expansion of mobile and ~~wireline~~ Fixed connectivity	2	No Change
				4.2.3 Ease of access of DCI installed for repair or maintenance	1	No Change
4.3	3	Provision in power infrastructure, over and above MBBL or NBC requirements,	5	4.3.1 Redundancy of power source	1	No Change
				4.3.2 UPS power backup for DCI	2	No Change
				4.3.3 Power continuity monitoring	1	No Change

Criteria No.	S. No. (as per regulation)	Criteria (a)	Weightage (b)	Sub-Criteria (c)	Sub-Criteria weightage (Revised)	Justification
		for ensuring reliable digital connectivity		4.3.4 Building Management System	1	No Change
4.4	4	Digital Connectivity Infrastructure Resilience	10	4.4.1 Availability of alternate entry paths for digital connectivity infrastructure	3	No Change
				4.4.2 Non-flooding measures for DCI installation	3	No Change
				4.4.3 Implementation of redundancy in power source and DCI paths	4	No Change
4.5	5	Future Readiness of Digital Connectivity Infrastructure	~~10~~ ~~5~~	4.5.1 Availability of the latest generation of mobile connectivity	~~4~~ 2.5	
				~~4.5.2 Support for future bands~~	~~3~~ 0	To be removed as Property managers will have no control on this.
				4.5.3 Upgradability of ~~wireline~~ Fixed DCI	~~3~~ 2.5	This is a key measure for future readiness.
4.6	6	Provision of Fixed Connectivity infrastructure	~~20~~ 30	4.6.1 Backhaul fiber connectivity (service provider to property)	10	10
				4.6.2 Fixed Wireless Access Connectivity	10	FWA will be meeting a large part of demand for

Criteria No.	S. No. (as per regulation)	Criteria (a)	Weightage (b)	Sub-Criteria (c)	Sub-Criteria weightage (Revised)	Justification
						Fixed connectivity
				4.6.2 Fiber connectivity till user premises	5	No Change
				4.6.3 Fiber connectivity in each room or office or commercial space	5	No Change
4.7	7	Availability of Service Providers	15	4.7.1 Number of wireline Internet Service providers having integration with Digital Connectivity Infrastructure	7.5	No Change
				4.7.2 Number of Mobile Service providers having coverage or integration with Digital Connectivity Infrastructure	7.5	No Change
4.8	8	Service Performance	~~25~~ 20	4.8.1 Mobile network coverage and performance in public areas of property	~~5~~ 7.5	Mobile coverage is the most important metric in coverage and should be weighted accordingly.
				~~4.8.2 Secure public Wi-Fi network coverage and performance~~	~~5~~	To be removed as not relevant to most buildings

Criteria No.	S. No. (as per regulation)	Criteria (a)	Weightage (b)	Sub-Criteria (c)	Sub-Criteria weightage (Revised)	Justification
				~~in public areas of property~~		
				4.8.3 Mobile network coverage and performance in non-public areas	~~5~~ 7.5	Mobile coverage is the most important metric in coverage and should be weighted accordingly.
				~~4.8.4 Secure public Wi-Fi network coverage and performance in non-public areas~~	~~5~~	The property manager has no control on this and this will be a subset of consumer choice and availability of Fixed connectivity
				4.8.5 Average download speed of different wireline network(s) in respective highest speed plan	5	5
4.9	9	User Experience	5	4.9.1 User feedback on digital connectivity experience	5	5

F. Other Submissions

22. We reiterate our submissions that multi-sectoral proposals such as this Regulation and Manual should involve discussions with all relevant stakeholders and related sectoral Regulators. This could have helped the regulations become more nuanced. We once again request the Authority to set-up the advisory council and have independent discussions with key builders and Property Managers. As at this stage, major challenge would be to break the inertia and bring the Property Managers onboard this process.