



**Bharti Airtel Ltd.**

India & South Asia  
Airtel Center, Plot No. 16,  
Udyog Vihar, Phase - IV,  
Gurugram - 122 015  
Haryana, India

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

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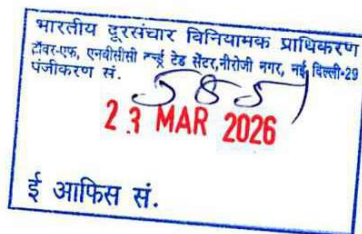
**Shri Tejpal Singh**

**Advisor (QoS-I)**

**Telecom Regulatory Authority of India**

World Trade Centre, Nauroji Nagar

New Delhi – 110029



**Subject: Bharti Airtel's Comments on Review of Rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024)**

Dear Sir,

This is in reference to TRAI's 'Review of Rating of Properties for Digital Connectivity Regulations, 2024 (7 of 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, Telecom Regulatory Authority of India, World Trade Centre, Nauroji Nagar, New Delhi – 110029**
- ✓ 2. **Lt. Col. Baljeet Singh Cheema, Joint Advisor (QoS 1), Telecom Regulatory Authority of India, World Trade Centre, Nauroji Nagar, New Delhi – 110029**

## ***Response to Review of Rating of Properties for Digital Connectivity Regulations, 2024***

Airtel thanks the Telecom Regulatory Authority of India (TRAI) for the opportunity to provide its comments on the **Review of the Rating of Properties for Digital Connectivity Regulations, 2024** (“Regulations”).

We understand that this consultation arises from capacity-building initiatives undertaken by the Authority with the digital connectivity and real estate ecosystem, in particular Property Managers and Digital Connectivity Rating Agencies (DCRAs). As TRAI has deemed it appropriate to review the Regulations to better align them with on-ground practices and to ensure their effective implementation, we submit that the Regulations be reviewed in a more holistic manner, and that certain issues raised by stakeholders in earlier submissions may also be reviewed.

We broadly support the amendments proposed by TRAI to: (i) ensure that the rating meaningfully differentiates between properties with varying levels of digital connectivity readiness and performance; (ii) incorporate necessary criteria for properties under construction; (iii) refine the current categorisation of certain property types; and (iv) allow Property Managers to obtain a pre-rating evaluation prior to applying for a formal Digital Connectivity Rating.

These amendments are primarily aimed at providing regulatory easement for Property Managers and DCRAs and will facilitate greater market acceptance of the rating mechanism.

***In our previous response, we had submitted that “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.”***

With this context, we welcome the Authority’s intent to review the Regulations in light of feedback received from Property Managers and DCRAs but also urge the Authority to consider the points submitted by network operators, who are equally critical stakeholders in the success of the rating mechanism.

While TRAI has issued an Explanatory Memorandum analysing and responding to stakeholder comments, we take this opportunity to reiterate a few issues that, in our view, merit closer scrutiny. **We request that these aspects be duly underscored by TRAI in the Regulations themselves and in the Authority’s outreach to the real estate and rating agency ecosystem, including in its stakeholder capacity-building initiatives.**

### Greater certainty in Cost Allocation principles

Telecom is often treated by property owners as a revenue source rather than as a core utility, leading to IBS auctions for exclusive rights, high access fees for TSPs, and de facto exclusivity for a single service provider. While TRAI has duly recognised these concerns in its Consultation Paper and Recommendations to DoT on In-Building Access by Telecom Service Providers, we submit that the Regulations do not go far enough in addressing this issue.

**TRAI should clarify that digital connectivity infrastructure is an inherent component of property development costs, at par with utilities such as water and electricity.** In its Explanatory Memorandum, TRAI has noted that *“the Authority has already given its recommendations to the Government to empower the property managers to install the in-building solutions”* and that *“the Model Building Bye-Laws (MBBL) broadly cover the role and responsibilities of the property manager.”* However, despite the techno-legal framework set out in the MBBL, there remains a serious lack of understanding among property owners that the cost of enabling telecom infrastructure and IBS must be treated as an integral element of property development expenditure, just as is the case for other essential utility services like water, gas, or electricity.

**The Authority may therefore consider explicitly providing through its regulatory framework that the cost of in-building digital connectivity infrastructure, including IBS, shall be capitalised by the Property Manager as part of the project development cost, with TSPs bearing only their own equipment and operational expenses, so as to prevent any cost-recovery from Service Providers in the form of access fees, revenue-share arrangements or IBS-linked premiums.**

### Regulatory clarity and implementation of associated regulations

We had earlier submitted that foundational prerequisites, such as the DCIP licensing framework and state-level adoption and implementation of the relevant building bye-laws and building code, should ideally be in place before the Regulations are brought into effect. The Authority has observed that adoption of these measures *“will further accelerate the adoption of the rating framework.”*

In this context, we submit that the ongoing efforts of the central and state governments, together with the Authority’s own initiatives, are already directed towards faster and more consistent implementation of the associated regulatory instruments and should now be further accelerated to maximise the impact of the Regulations. **Accordingly, TRAI may consider linking the commencement and progressive tightening of the rating framework to clear, objectively verifiable milestones on notification, adoption, and effective implementation of the relevant licensing and building-by-law measures by the central**

**and state governments, so that the Regulations operate on a stable, coherent, and fully functional regulatory foundation.**

### Speed criteria for Service Performance

With reference to the Rating Manual annexed as Chapter 5 and, in particular, Sections 4.8 and 5.6 titled 'Service Performance', we request the Authority to reconsider the proposed speed criteria, namely 'average minimum download speed of 10 Mbps for 4G or 100 Mbps for 5G technology, as applicable.'

We had earlier submitted that the performance criteria should align with the minimum rollout obligations (MRO) for download speeds of 4G and 5G services, i.e.:

- For 4G: throughput equal to or better than 2 Mbps, measured as successful file download test cases in percentage;
- For 5G: a 100 MB file to be downloaded at each selected test location within 5 mins.

In its Explanatory Memo, the Authority has observed that the MRO benchmark is *"unreasonable and unjustified as it is very low compared to the download speeds supported by 4G and 5G technology"* and that these speeds *"are well below the typical download speeds declared by the service providers under revised QoS regulations."*

We submit that the MRO speed criteria are the only available speed benchmarks that a TSP is obligated to meet as per its license conditions. While it is correct that 4G and 5G technologies support higher speeds and that speed reported under QoS declarations may be of a higher order, the Authority may consider several overriding factors:

- The speed experienced by a user depends on multiple elements such as **spectrum bandwidth deployed by the operator, number of active users at a given time, device capability, DAS configuration (1T1R/2T2R), modulation scheme, rank indicator, etc.**
- More importantly, it should be noted that the speed benchmarks specified in the Manual are **far higher than what is empirically necessary for prevalent mobile bandwidth use cases** such as web browsing, video streaming, instant messaging, video conferencing, and gaming. These applications typically require speeds in the range of approximately 1-25 Mbps.
- Lastly, it may be emphasised that the objective of the criterion 'Mobile network coverage and performance in public areas' is primarily to assess the dispersion and availability of the network within a building, further qualified by a minimum speed benchmark which is secondary factor. **By keeping the secondary benchmark higher than necessary, the overall score under this criterion will get impacted.**

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In view of the above, we respectfully **submit that the Authority may adopt the MRO speed benchmark for all property types**, since it is the minimum and uniformly applicable benchmark that all operators are required to meet.

### **Reduce weightage of Public Wifi**

*In relation to Sections 4.8 and 5.6 of the Manual, we had previously submitted that “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 [public] 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 [public] Wi-fi connectivity and assigned the same weightage.”*

In response to comments from the industry, the Authority has seen it fit to rationalise weightage for mobile and Wi-Fi coverage. The Authority has noted that *“reliable and secure Wi-Fi, especially in the residential and office properties, can be used to offload mobile traffic”*. This points to the fact that Mobile connectivity is the primary network used by building occupants. In homes and offices, the secondary option is private wi-fi. Public wi-fi is a tertiary option for users.

The manual was accordingly changed to reflect the new weightage – **however, we believe that the weightage can be drastically rationalised to accord much greater weightage for mobile coverage.**

### **User feedback forms**

User feedback forms are often affected by subjectivity, bias, and a limited understanding of the purpose or object of the survey, which can undermine the accuracy and usefulness of the insights generated. The survey questionnaire should therefore be carefully designed to minimise these issues.

The survey should also ensure that users clearly understand the services they are rating and respond accordingly. For instance, when rating ‘Broadband Service Performance’, it should be unambiguous **whether the user is assessing the public Wi-Fi network or a private Wi-Fi network** used in an office or home environment.

If the objective of the user feedback form is to evaluate the private Wi-Fi services being provided by Service Providers to various customers within the building, this should be clearly and prominently stated in the user feedback form.

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Accordingly, **user feedback forms should be structured with precise terminology and clear contextual cues so that the responses collected genuinely reflect the quality of the specific services under assessment.**

### **Conclusion**

We respectfully urge the Authority to incorporate the above recommendations in the final framework so that the Rating of Properties for Digital Connectivity Regulations, 2024, are firmly grounded in practical deployment realities. To summarise the same:

- 1. The Authority should clearly require that Property Managers treat in-building digital connectivity (including IBS) as a project development cost, with TSPs paying only for their own equipment and operations, and no extra access fees or revenue-share.**
- 2. Ensure timely and harmonised implementation of associated regulatory instruments such as National Building Code and Model building bye-laws**
- 3. Align speed benchmarks with MRO-based obligations**
- 4. Further reduce the weightage accorded to Public Wifi in Section 4.8 and 5.6 of the Manual**
- 5. Refining the design and scope of user feedback forms**

By incorporating these changes in the review of the Regulations, TRAI can help create a rating regime that is fair, implementable and truly reflective of on-ground conditions.

Airtel remains fully committed to supporting the Authority in this endeavour and will be pleased to engage further, including through technical workshops or stakeholder consultations, to help ensure the successful rollout and acceptance of the rating framework across India.

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