

**BIF comments in the format prescribed by TRAI for submitting response on  
consultation Paper on Review of rating of Properties for Digital Connectivity Regulations,  
2024 (7 of 2024)**

Name of the Commentator/ Organization: **Broadband India Forum**

<b>S. No.</b>	<b>Regulation No./ Rating Manual reference / Subject</b>	<b>Comments/ Suggested modified wordings</b>	<b>Justification for Comments/ Suggestions by BIF</b>
	Rating manual clause 3.7 Ability of the rating to <b>meaningfully differentiate</b> between properties with varying levels of digital connectivity readiness and performance	Properties with different levels of digital connectivity readiness may fall within the same star category, particularly where scores lie close to the boundaries between rating levels	From the perspective of <b>Property Managers</b> , such outcomes limit the ability to reflect incremental improvements in digital connectivity performance.  Progression from one Star rating to the next Star level requires a minimum additional score of approximately 15 points. As a result, even where measurable improvements are made across one or more criteria or sub-criteria, such improvements may not translate into a higher star rating unless the cumulative score crosses the next defined threshold. From the perspective of <b>consumers</b> , they reduce the extent to which ratings convey nuanced differences in connectivity experience between properties. Stakeholders noted that this has implications for how rating outcomes are interpreted and used by different participants within the ecosystem. This will motivate Property Managers to go for incremental improvements in digital infrastructure inside the buildings.
	Rating Manual clause 3.8 Application of the rating framework in the context of <b>properties under construction,</b>	While Property Managers may make design-stage provisions for Digital Connectivity Infrastructure (DCI), there is currently no structured mechanism or recognised document through which the intended	Property Managers are unable to credibly demonstrate the level of digital connectivity planned in the property, and consumers, who often make purchase decisions at this stage, have <b>no visibility</b> into the planned level of digital connectivity for which the property is being designed.

		<p>level of digital connectivity can be communicated during the marketing and booking of properties including in construction phase</p>	<p>aforsaid aspect is important for the property managers to encourage them for planning the digital connectivity infrastructure as a part of building plan while preserving the credibility of digital connectivity ratings.</p> <p>there is need for a <b>structured and transparent mechanism</b> that provides visibility of rating right from design stage through construction to completion stages. TRAI must introduce due safe guards by any of the following methods</p> <ol style="list-style-type: none"> <li>1. Imposing penalties if property managers do not comply to “Designed for XX rating” issued by DCRA.</li> <li>2. Introduce provision that - Occupation certificate is not issued by concerned authorities till the building is star rated as declared in the design rating.</li> </ol>
	<p>Section 26(2) of regulation Review of present categorization of certain property types under Category ‘A’ and Category ‘B’.</p>	<p>Certain property types presently included under <b>Category ‘B’</b>, such as hospitals, hotels, and educational institutions, exhibit usage patterns and in-building digital connectivity requirements comparable to commercial office complexes and shopping malls, which are classified under Category ‘A’.</p>	<p>Requirements of certain property types currently included under Category ‘A’, such as multi-modal logistics parks, are more aligned with properties under Category ‘B’</p> <p>While metro corridors are not explicitly mentioned, they form a critical part of urban transport infrastructure and hence needed to clearly mentioned and classified for clarity of stakeholders.</p>
	<p>Rating Manual clause 3.9 Need of Property Managers to seek a fair evaluation of its Digital Connectivity Infrastructure in order to plan improvement even before applying for a Digital Connectivity Rating.</p>	<p>There may be scenarios where a Property Manager may wish to evaluate present level of Digital Connectivity Infrastructure (DCI) in a property for the purpose of identifying gaps and improvements required, without applying for a</p>	<p>Once a rating is awarded, it becomes publicly visible, and therefore some Property Managers prefer to first identify gaps and undertake improvements before entering into a formal rating assessment.</p> <p>Property Managers may find value in obtaining an audit of the existing</p>

		<p>Digital Connectivity Rating</p>	<p>digital connectivity infrastructure against the criteria and sub-criteria prescribed in the Rating Manual, primarily for assessing the present status, gaps and areas requiring improvement.</p> <p>Authority proposed to enable the property managers to undertake optional digital connectivity audit of their properties through TRAI registered DCRA's without applying for the ratings. This is right move as it will help in prompting existing properties to go for ratings and may help them in identifying areas of improvements of digital infrastructure inside the buildings.</p>
	<p>General Comment</p>	<p>Certainty is required regarding cost allocation for enabling telecom infrastructure for a property, and the role of the Property Manager must be explicitly stated.</p> <p>Clarify that 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</p>	<p>Since digital connectivity infrastructure is an inherent component of property development costs (at par with utilities such as water and electricity), the cost of enabling telecom infrastructure and IBS must be treated as an integral element of property development expenditure and should be absorbed by the property managers.</p> <p>Thus, no cost recovery to be done from Service Providers in the form of access fees, revenue share arrangements or IBS linked premiums</p>
	<p>Sections 4.8 and 5.6 titled 'Service Performance',</p>	<p>Reconsider the proposed speed criteria, namely 'average minimum download speed of 10 Mbps for 4G or 100 Mbps for 5G technology, as applicable.'</p>	<p>TRAI may reconsider the speed criteria in line with the DoT notification dated 25<sup>th</sup> Jan, 2023 on definition of Broadband.</p>

	<p>4.9.1. Sub-Criteria: User feedback on digital connectivity experience</p>	<p>The survey questionnaire should be carefully designed to minimize ambiguity and user bias/subjectivity.</p>	<p>The survey should ensure that users understand the services they are rating and respond accordingly.</p> <p>For instance, when rating ‘Broadband Service Performance’, it should be amply clear whether the user is assessing the public Wi-Fi network or a private Wi-Fi network used in an office or home environment.</p> <p>User feedback forms are 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.</p>
	<p>General Comment</p>	<p>Ensure harmonized implementation of associated regulatory instruments such as the DCIP framework, National Building Code, and Model building bye-laws.</p>	<p>Ongoing efforts of the central and state governments, as well as the Authority’s initiatives, are working to ensure faster and more consistent implementation of associated regulatory instruments. These should be further accelerated to improve the impact of the Regulations.</p>