



1939, 9th MAIN, 27th CROSS, BANASHANKARI 2nd
Stage, BENGALURU - 560070
Phone: 6364928222
E-Mail : ccsbng@gmail.com
Website: ccsbng.org

21st March 2026,

To,

Shri Tejpal Singh,

Advisor (QoS-I),

TRAI.

Sir,

Subject:- Comments on Consultation Paper on Review of Rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024)

We are a registered CAG of TRAI.

We appreciate TRAI for providing another opportunity to provide a consumer perspective on an important initiative of Rating of Properties for DCI. We had in our earlier comments when the CP for a Rating Framework was released, expressed our apprehensions on the effectiveness of a composite rating due to its complexity and opaqueness.

Despite our continued concerns, we are pleased to attach our comments/suggestions on the above consultation paper in 2 parts, one on the relevant provisions of Regulations and Rating Manual, and other on specific issues on the subject.

We request to review our comments and consider them suitably.

Thanking you,
Yours Sincerely

GOPAL RATNAM V
Secretary
Consumer Care Society

Comments on Consultation Paper on Review of Rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024)

Name of the Commentator/ Organization: **CONSUMER CARE SOCIETY**

In response to the consultation paper on the Formulation of a Framework for Rating of Properties in 2024, Consumer Care Society had expressed its objections to a single composite measure for rating of properties. A few of the concerns were that a composite Rating with many parameters would be difficult for an average consumer to understand even if they were made aware of the parameters. Further, the composite rating would balance out the different parameters making it a less useful measure, enabling a property manager to hide the deficiencies of critical nature with enhanced rating of a less critical parameter. Also the rating focuses on the infrastructure and NOT the consumer experience of the digital service and hence quite valueless to the consumer.

However with TRAI having decided to proceed with the implementation of the current framework, we have assessed this from a consumers' perspective and made 2 type of suggestions. One, of specific amendments to the Regulations and Ratings Manual (A) and other comments on issues not pertaining to a specific provision (B).

A. Specific amendments to the Regulations and Ratings Manual

S. No.	Regulation No. / Rating Manual reference / Subject	Comments/ Suggested modified wordings	Justification for Comments/ Suggestions
1	Categorisation of Property Types (Regulation 3)	Reclassification of hospitals, hotels, and educational institutions to Category A is appropriate. Additionally, define minimum connectivity standards for critical services (hospitals, emergency services) .	These are essential services where poor connectivity directly impacts safety and service delivery.
2	Categorisation of Property Types (Regulation 3)	Support reclassification. Additionally, recommend separate sub-category for educational institutions (hostels vs campuses) .	Connectivity needs differ significantly (e.g., student usage density vs administrative use). Better categorisation ensures accurate assessment and consumer relevance .
3	Categorisation – Transport Corridors (Regulation 3)	Add explicit inclusion of underground metro stations and tunnels with specific criteria.	These are high consumer pain points (call drops, no data). Needs targeted assessment for urban commuters.

4	Transport Corridors (Category B) (Regulation 3)	Include minimum uninterrupted connectivity requirement (e.g., call drop thresholds) for metro corridors and highways.	Consumers expect seamless connectivity in transit; currently a major pain point in India.
5	Rating of Properties Under Construction (Regulation 14 & Manual 3.8, Subsection iii, Clause c VI)	“Designed for XX Stars” certificate should include a mandatory disclaimer in bold: “Final rating may vary based on actual implementation.”	Prevents misleading marketing practices and protects homebuyers who rely on pre-construction claims.
6	Regulation 17 & Design Compliance	Introduce penalty clause: “Deviation from approved DCI design leading to downgrade of final rating shall attract financial penalty and mandatory disclosure to buyers. ”	Ensures accountability of builders. Without penalties, design-stage commitments may not translate into actual delivery.
7	Regulation 26 – Star Rating Levels	The introduction of half-star ratings is welcome. However, TRAI should mandate disclosure of actual score (numerical) along with star rating in public domain.	Star ratings alone may still hide variation. Consumers benefit from granular transparency (e.g., 72 vs 80 score both in 4-star earlier).
8	Regulation 26 – Rating Scale	Include minimum QoS benchmarks (e.g., minimum download speed, latency thresholds) mapped to each star category.	Consumers relate better to experience-based metrics rather than abstract scores. Enhances usability of ratings in decision-making.

B. Issues not pertaining to a specific provision

S. No.	Regulation No. / Rating Manual reference / Subject	Comments/ Suggested modified wordings	Justification for Comments/ Suggestions
Rating During Construction Issues			
1	Construction Phase Monitoring	Mandate periodic public updates (e.g., quarterly) on deviation from design-stage commitments.	Reduces risk of design vs execution gap , a common issue in real estate affecting consumers.
2	Final Rating (Post Construction)	Introduce penalty or downgrade mechanism if final rating deviates significantly (>1 star) from design-stage claim.	Ensures accountability of property managers and builds trust in the framework.

DRCA Issues			
3	Role of DCRA's	Introduce consumer complaint mechanism against DCRA's and periodic independent audits of DCRA performance.	Ensures credibility and trust in the rating ecosystem; prevents conflict of interest.
4	Conflict of Interest (Schedule I)	Expand disclosure requirements: DCRA's must publicly declare past and present engagements with property developers .	Enhances transparency and independence , critical for consumer trust.
5	Periodicity of Rating	Add: "Ratings shall be valid for a limited period (e.g., 3 years) with mandatory reassessment."	Connectivity degrades or improves over time. Ensures ratings remain current and reliable .
Rating Manual Issues			
6	Purpose and Scope of Rating Manual	The manual provides a structured methodology for assessment of digital connectivity across different property types. This is essential for consistent implementation. From a consumer perspective, the manual should also include guidelines for public interpretation of ratings .	Consumer should be able to educate themselves on the ratings and their interpretation. This will ensure that there is effective check on the property managers and DCRA's.
Consumer Grievance Issues			
7	Complaint & Grievance Mechanism	Add provision: "Consumers shall be able to file complaints against misleading ratings or poor connectivity despite high rating ."	Creates feedback loop and accountability . Protects consumer rights post-purchase.
8	Feedback and Grievance Mechanism	Link property rating with consumer grievance data (QoS complaints, downtime, etc.) .	Adds real-world performance validation beyond infrastructure readiness.
9	Integration with Real Estate Regulation	Recommend integration with Real Estate Regulatory Authority disclosures for property listings.	Ensures ratings are visible at point of purchase decision , not as a separate system.

GOPAL RATNAM V
 Secretary
 Consumer Care Society