We thank the Authority for providing us the opportunity to respond to the consultation Paper on “Review of Rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024)”

1. <u>Primary onus should be on Property Managers</u>

a) Property managers stand to be the primary beneficiaries of building ratings—gaining enhanced marketability, the ability to command premium rents, improved tenant retention—there is a compelling case for them to bear the costs associated with rating of buildings. This financial responsibility is a logical extension of their vested interest; the tangible advantages they accrue directly justify the investment in certification. Furthermore, ensuring robust digital connectivity, a critical prerequisite for modern building functionality and tenant satisfaction, falls naturally within the property manager's operational purview. Specifically, the property manager should be obligated to allocate and maintain adequate space within the building for Telecom Service Providers (TSPs) to install essential interconnection infrastructure in a non-discriminatory and non-exclusive arrangement basis. Consequently, it should be incumbent upon the property manager to fund and execute the rating process while proactively securing and maintaining all necessary digital infrastructure—including provisions for TSP access—to achieve and sustain a certified rating.

b) If digital infrastructure is laid out and connectivity is made available, it would give assurance to the consumers while going for purchase or for using the said building/premise. This will help the Property Managers of the said building/premises to build more trust with the consumers and also influence the consumer’s choices. The building/premise with better digital connectivity will always be preferred more by the consumers as compared to the ones having lesser connectivity. **Thus, the Rating framework ‘Creates Value’ for the Property Managers.**

c) As the Authority has recommended that the Government buildings should mandatorily come under the Rating framework, it should ensure that there should not be a reverse pressure on TSPs/ISPs to absorb the cost of provisioning the digital connectivity infrastructure or digital connectivity or repair/maintenance etc for Government buildings or for buildings of

Public importance like metro/railway stations, airports etc. It has to be explicitly captured that the cost and ownership for this, would have to be borne by the Property Managers (including Government bodies wherever applicable) and a suitable commercial agreement should be executed by them with the respective TSPs/ISPs.

2. Clarity in Cost Allocation principles

a) TSPs face significant challenges in implementing IBS, as property owners often treat telecom as a commercial activity, resulting in allocation of exclusive rights and charging high access fees from TSPs. This has led to practices such as IBS auctions for exclusive rights, high access fees for TSPs, and de facto exclusivity for a single service provider. TRAI should recognise this challenge. Clear policy direction and targeted awareness are essential to prevent further commercialisation and rising costs for TSPs. While TRAI has acknowledged these concerns in its Consultation Paper and Recommendations to the DoT on in-building access by telecom service providers, we submit that the proposed Regulations do not go far enough to address the issue.

b) TRAI **should clearly establish that digital connectivity infrastructure is an integral part of property development, on par with essential utilities** such as water and electricity. In its Explanatory Memorandum, TRAI notes that it has already recommended empowering property managers to install in-building solutions, and that the Model Building Bye-Laws (MBBL) broadly define their roles and responsibilities.

c) However, despite this techno-legal framework, there remains a significant lack of awareness among property owners that the cost of enabling telecom infrastructure, including IBS, must be treated as a fundamental component of development expenditure—like other essential utilities such as water, gas, and electricity.

d) Accordingly, the cost of such infrastructure should be absorbed within the overall project cost, with a plug-and-play approach to ensure seamless, non-discriminatory access for all service providers.

e) Such an approach would ensure that telecom licensees are not unfairly burdened with the entire cost of connectivity deployment, especially in high-rise buildings or gated complexes where infrastructure access is often restricted. Ultimately, the goal must be to enhance the business case for telecom providers to invest in last-mile connectivity.

3. Reduce weightage for Public WiFi

a) The focus area of the manual is on Buildings and not all residential buildings have open spaces where commercial Wi-Fi connectivity can be made available. The primary mode of connectivity will remain mobile and fixed line services. The limited Wi-Fi availability in open spaces of residential buildings will pertain to the building's own Wi-Fi, which is not used by even the residents and is used instead by building officials and work force. Moreover, with advanced mobile technologies (4G/5G) providing good data speed, the very utility of using public wi-fi for data consumption is diminishing and the rating framework should not encourage any inefficiencies. Further, if mobile coverage is addressed inside buildings/premises, there will be no need left for users to latch to public wi-fi. In this context, the weightage given to Wi-Fi in rating of buildings seems out of place. Further, limited adoption of public Wi-Fi is also evident from the lack of success of PM-WANI as its adoption rate is far below the NDCP 2018 target of 10 million. Thus, it seems illogical to give equal weightage to this medium in rating of buildings and we request the TRAI to address this anomaly.

b) Further, user preferences are increasingly shifting towards personalized and secure internet access. Since Public Wi-Fi is a shared resource, it is also often perceived as less secure as compared to personal mobile data connections, making telecom networks as the natural choice of subscribers. Moreover, with advancements from 2G, 3G, 4G, and 5G, and discussions around 6G, telecom networks now provide faster, more reliable internet access, making public Wi-Fi increasingly unnecessary.

c) Given these demonstrated shifts in user behaviour, technological superiority, and security perceptions, public Wi-Fi no longer represents a critical differentiator for modern buildings/premises**. Rating systems should accordingly reflect this reality by assigning substantially reduced weightage to public Wi-Fi** provisions, reallocating scoring emphasis to more relevant connectivity solutions like robust telecom infrastructure and seamless 4G/5G availability and 5G/6G readiness.

d) We duly note that based on the industry's feedback, the Authority has reduced the weightage given to public wi-fi by a single point. We submit that given the rationale provided, a greater deduction is merited.

4. Need for Regulatory Clarity and Inter-Ministerial Alignment

a) For any digital connectivity rating mechanism to be effective and sustainable, it is essential to obtain regulatory clarity on key frameworks that directly impact its implementation. This includes the Department of Telecommunications' (DoT) position on the proposed Digital Connectivity Infrastructure Provider (DCIP) Authorization, as well as broader alignment with the licensing and authorization provisions under the Telecommunications Act, 2023. Industry feedback on the DCIP framework must also be duly considered to ensure practical and equitable implementation.

b) In parallel, there is a pressing need to clarify how other associated regulations, particularly the Model Building Bye-Laws (MBBL) and the National Building Code (NBC) will be operationalized in the context of the rating system. In the absence of such feedback and alignment, the entire exercise would be rendered ineffective and ultimately meaningless.

5. MRO to be the speed benchmark for all property types

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

b) In its Explanatory Memorandum, the Authority has observed that the MRO benchmark is "unreasonable and unjustified" as it is significantly lower than the speeds supported by 4G and 5G technologies, and below the typical download speeds declared by service providers under the revised QoS regulations.

c) We respectfully submit that the MRO speed criteria remain the only binding benchmarks that TSPs are obligated to meet under their licence conditions. While it is true that 4G and 5G technologies are capable of higher speeds, and that QoS-reported speeds may also be higher, several important considerations merit attention:

   i. The speed experienced by a user depends on multiple factors, including spectrum bandwidth deployed, number of active users at a given time, device capability, DAS configuration, modulation scheme, and rank indicator.

   ii. The speed benchmarks specified in the Manual are significantly higher than what is required for common mobile use cases such as web browsing, video streaming, instant messaging, video conferencing, and gaming, which typically operate effectively within a range of approximately 1–25 Mbps.

iii. The primary objective of the criterion 'Mobile network coverage and performance in public areas' is to assess network availability and distribution within a building. The minimum speed threshold is a secondary consideration in this context.

d) In view of the above, we humbly request the Authority to adopt the MRO speed benchmark across all property types, as it represents the minimum, uniform, and enforceable standard applicable to all operators.

6. Feedback from users

a) User feedback forms are often affected by personal bias and a lack of clear understanding of the survey's purpose, which can reduce the usefulness of the responses. Therefore, the questionnaire should be designed carefully to minimise these issues.

b) The survey should also make sure that users clearly understand what they are being asked to rate. For example, when rating 'Broadband Service Performance', it should be clear whether the user is evaluating a public Wi-Fi network or a private Wi-Fi network used at home or in an office.

c) If the purpose of the feedback form is to assess private Wi-Fi services provided within the building, this should be clearly and prominently stated.

S No.	Chapter of the Draft Manual	Clause/Para/ Table/Figure No. of the Draft Manual	Comments/Suggested modified Wordings (COAI)	Justification for Proposed Change
1	3	**Clause 3.2** **Registration process of DCRA.**	The following clause should be added in clause 3.2 covering the aspect of registration process of DCRA "The registration process of DCRA or any review thereafter, should also involve evaluation of their application by an Empowered Committee, which should also include Technical experts from TSPs. "	As the major part of the rating framework would be to set up digital connectivity infrastructure and connectivity, from mobile and wireline broadband point of view, it is important that a collaborative approach is adopted and TSPs are also involved in examining the registration of DCRAs. The technical experts from TSPs can provide rich insights during evaluation process as well as subsequently during any review of the working of any DCRA.
2	**3**	**Clause 3.5,** **General Obligations for Property Manager-**	***We suggest addition of Point ix as below-*** The responsibility for bearing the cost of establishing network infrastructure, power and associated equipment should rest with the property manager.	As stated in the point 2 of the preamble above, we reiterate that digital connectivity is now considered a basic utility, like water and electricity, and should be part of a property's essential infrastructure. As the Rating will create Value for the Property Managers, they should be responsible to bear the cost for establishing and augmenting the infrastructure, equipment etc, for ensuring suitable coverage

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				availability.
3	**3**	**Clause 3.6,** <u>Classification of Properties for Rating</u> Table 3.1	As mentioned in TRAI's recommendations, we reiterate that properties should be classified with priority given to buildings having higher footfall.	We would like to submit that the properties should be classified with priority given to buildings having higher footfall.
4	**4**	**Table 4.39** <u>Scoring Criteria</u> **Weightage 7.5-** If 3 or more internet service providers have integration with DCI in the property with active service subscription. **Weightage 5-** If a minimum of 2 internet service providers have integration with DCI in the property with active service subscription. **Weightage 2**- If at least one internet service provider has integration with DCI in the property with active service subscription.	Suggested change is as follows: **Weightage 8.5**- If 3 or more internet service providers have integration with DCI in the property with active service subscription. **Weightage 4 -** If a minimum of 2 internet service providers have integration with DCI in the property with active service subscription. **Weightage 2**- If at least one internet service provider has integration with DCI in the property with active service subscription.	The gap in weightage between the presence of two Service Providers and three Service Providers should be sufficiently significant to encourage the provisioning of connectivity by atleast three SPs.

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5	**4**	**Table 4.1, Clauses 4.8.1 and 4.8.2** Mobile network coverage and performance in public areas of **property (Weightage – 6)** Secure public Wi-Fi network coverage and performance in public areas of property **(Weightage – 4)**	Suggested change is as follows: Mobile network coverage and performance in public areas of property **(Weightage- 8)** Secure public Wi-Fi network coverage and performance in public areas of property **(Weightage- 2).**	The primary objective of digital infrastructure within a property is to provide reliable connectivity to its occupants, not to serve the general public. There is no justification for introducing an additional layer of Public WiFi beyond existing mobile and broadband services. Furthermore, as stated in point 4 of the preamble, we reiterate that with the widespread availability of affordable 4G and 5G data for subscribed users, the relevance of public Wi-Fi has significantly diminished.
6	4	**Table 4.41(2) And Table 5.31(2)** **S. No.** / **Weightage** / **Compliance Requirement** 2. / 5 / If at least two mob service providers ha integration with DCI the property or mo 75% coverage in indo areas.	In the weightage for "If at least two mobile service providers have integration with DCI in the property or more 75% coverage in indoor areas" the weightage of '5' to be reduced to '3'.	It is imperative that adequate service providers coverage is made available, to ensure universal connectivity.

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7	**4**	**Clause 4.8.1** **<u>Sub-Criteria</u>:** Assessment Methodology- a) Assess data speed and voice call quality over a day (preferably 10 am to 8pm with samples uniformly distributed covering peak hours in property) using test probes for each service provider whose coverage is available on the property and accounted under criteria 7-*Availability of Service Providers'.* Measurements to be carried out shall include peak as well as off-peak hours.	Assess data speed and voice call quality over a day (preferably 10 am to 8 pm with samples uniformly distributed covering peak hours in property) **using TRAI Myspeed App or other speed testing devices** for each service provider whose coverage is available on the property and accounted under criteria 7- Availability of Service Providers'. Measurements to be carried out shall include peak as well as off-peak hours.	TRAI Myspeed App may be used to assess data speed.
8	4	**Clause 4.8.3 (v) S. No. 2.of the Table 4.47** **<u>And</u>** **Clause 5.6.3 (v) S.No 2.of Table 5.37** **<u>Compliance requirement</u>** If at least 2 service providers have more than 70% mobile	Modified serial no. 2 should be as follows: If at least 3 service providers have more than 60% mobile coverage for their latest generation of technology in non-public areas (including lifts and basements).	It is imperative that adequate service providers coverage is made available, to ensure universal connectivity.

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		coverage (RSRP **≥ -** 110 dbm) for their latest generation of technology in non-public areas (including lifts and basements) with average minimum download speed of 10Mbps for 4G or 100 Mbps for 5G technology as applicable.		
0	**4**	**Clause 4.9.1** **Sub-Criteria:** Assessment Methodology: Conduct structured surveys capturing user satisfaction on voice call quality, voice call accessibility, voice call retainability, data speed (wireline and wireless), latency, service uptime and coverage.	**To be removed**	In the early phases, conducting these surveys may be premature. It would be preferable to allow the market to develop naturally before introducing such assessment processes, so as to avoid undue hindrance and foster healthy growth.
10	**5**	**Table 5.37** Technical Benchmarks- Minimum download speed of 10Mbps for 4G or 100 Mbps for 5G technology as applicable.	Technical Benchmarks- The minimum download speed requirements for 4G and 5G technologies should be aligned with that of MRO guidelines. ▪ For 4G: throughput equal to or better than 2 Mbps, measured as successful file download test cases in percentage.	As submitted in point 5 of the preamble, we respectfully reiterate that the MRO speed criteria remain the only binding benchmarks that TSPs are obligated to meet under their licence conditions and therefore should be the only criteria that TSPs are assessed on.

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			▪ For 5G: a 100 MB file to be downloaded at each selected test location within 5 minutes.	
11	5	**Clause 5.6.4** Sub-Criteria: Secure public Wi-Fi network coverage and performance in non-public areas	**The sub-criteria may be deleted.**	Non-public areas refer to spaces within offices, residences, and other establishments where general public access is restricted. In these zones, users depend on private networks that manage access and provide tailored security measures. Property owners or tenants may also choose to prohibit public Wi-Fi networks due to security and privacy considerations. Given these factors, it is neither practical nor appropriate to include these sub-criteria or assign any weightage to it.