



## **Comments by Consumer Guild on TRAI Consultation Paper on Review of Rating of Properties for Digital Connectivity Regulations, 2024 .**

### **1. Overall Consumer Interest**

Consumers strongly welcome the initiative to rate buildings based on digital connectivity, as internet access has become a **basic utility comparable to electricity and water**.

From a user standpoint, reliable indoor connectivity is essential for:

- Work from home / digital livelihoods
- Online education and telemedicine
- E-governance and financial services

However, the framework must prioritise **consumer awareness, affordability, and transparency**, not just technical compliance.

### **2. Need for Consumer-Friendly Rating System**

While the proposed enhancement from a 5-star to a **multi-level (including half-star) rating system** is useful, consumers emphasise:

- Ratings must be **simple, easily understandable, and prominently displayed**
- A **uniform labelling format** (like energy ratings) should be mandated
- Ratings should clearly reflect **actual user experience (QoS)**, not only infrastructure readiness

Consumers may otherwise find the system confusing or misleading.

### **3. Transparency and Disclosure**

Consumers strongly recommend:

- Mandatory public disclosure of ratings on:
  - Property websites



- Sale/lease agreements
- Entry premises (lobbies, brochures)
- Disclosure of:
  - Available telecom providers
  - Expected indoor signal quality
  - Infrastructure such as IBS (in-building solutions)

This aligns with TRAI's objective of improving **transparency and informed choice**.

#### **4. Coverage of Under-Construction Properties**

The proposal to introduce **design-stage rating** is appreciated. However, from a consumer viewpoint:

- Developers must be **legally bound** to deliver promised connectivity standards
- Any deviation post-construction should attract:
  - Penalties
  - Compensation to buyers

This is critical as many properties are sold during construction phase.

#### **5. Affordability and Cost Burden**

Consumers express concern that:

- Costs of digital connectivity infrastructure may be passed on to buyers/tenants
- Premium-rated buildings may become **less affordable**

Recommendations:

- Ensure **cost transparency**
- Encourage **infrastructure sharing among service providers**
- Avoid making ratings a tool for unjustified price escalation

#### **6. Voluntary vs Mandatory Implementation**

While currently voluntary, consumers strongly recommend:

- Gradual transition to **mandatory ratings through building byelaws**
- Integration with occupancy certification

Without mandatory enforcement, the system may:

- Remain limited to premium properties
- Fail to benefit the wider public



## 7. Independent Audits and Grievance Redressal

Consumers stress the need for:

- **Independent and credible Digital Connectivity Rating Agencies (DCRAs)**
- Periodic re-evaluation of ratings
- **A consumer complaint mechanism** for:
  - Poor connectivity despite high rating
  - Misleading claims by developers

## 8. Inclusion and Equity Concerns

The framework must ensure:

- Applicability across **affordable housing and smaller towns**, not just metros
- No widening of the **digital divide**

Digital connectivity is a **public good**, and ratings should not become an elitist benchmark.

## 9. Optional Audit Provision

The proposal for optional audits before formal rating is useful for developers, but:

- Consumers should have access to **audit summaries**
- Pre-rating audits should not be used to **delay transparency**

## 10. Recommendations :-

- **Make ratings mandatory and standardised**
- **Ensure clear, simple, and visible rating labels**
- **Link ratings with actual user experience (QoS)**
- **Introduce developer accountability for promised connectivity**
- **Prevent cost burden shifting to consumers**
- **Establish strong grievance redressal mechanisms**

## Conclusion

From a consumer standpoint, the regulation is a progressive step toward recognising digital connectivity as a core urban utility. However, its success will depend on:



- **Enforceability**
- **Transparency**
- **Consumer protection safeguards**

Without these, the framework risks becoming a **marketing tool for developers rather than a genuine indicator of service quality.**

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