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TRAI Registered DCRA

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SUBMISSION TO

Telecom Regulatory Authority of India (TRAI)

On
Consultation Paper on Review of Rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024)
Dated: 30 March 2026

Stakeholder Details

Name of Stakeholder: ICPL – Informatic Computech Private Limited
Stakeholder Category: Registered Digital Connectivity Rating Agency (DCRA)
Nature of Business: Digital Connectivity Rating Agency and IT Managed Services
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COMMENTS ON PROPOSED AMENDMENTS

Comments are submitted in the format prescribed in Annexure-I of the Consultation Paper.

1. Proposed Amendment I – Refinement of Star Rating Levels

(Amendment to Regulation 26)

Clause Reference	Comment	Justification / Rationale	Suggestion
Regulation 26 – Introduction of 9 Star Levels	The introduction of half-star levels improves differentiation; however, it significantly reduces score bandwidth per rating band, increasing scoring sensitivity and potential disputes.	Narrower bands (~8-point intervals) increase appeal risk, marginal scoring disputes, and reputational exposure for DCRA's.	Introduce a scoring moderation tolerance of ± 2 points for internal review prior to final star allocation. Provide detailed scoring interpretation guidelines to reduce subjectivity.

2. Proposed Amendment II – Rating of Properties Under Construction

(Design-Stage Certificate – “Designed for XX Stars”)

Clause Reference	Comment	Justification / Rationale	Suggestion
Regulation 14 (Proviso) and Rating Manual Section 3.8	The design-stage certificate creates visibility but increases legal and reputational exposure for DCRA's, especially where final rating differs from design intent.	As DCRA's providing consultancy services, there is heightened risk of perceived conflict or liability if developers market “Designed for XX Stars” aggressively.	TRAI should mandate a standardized disclaimer format to be displayed wherever “Designed for XX Stars” is used in marketing.

Clause Reference	Comment	Justification / Rationale	Suggestion
Construction Phase Monitoring	Monitoring scope is not clearly defined. It may be interpreted as ongoing supervision.	Undefined monitoring obligations may create open-ended liability exposure.	Clarify that monitoring is periodic verification only and does not constitute continuous supervision or engineering oversight.
Liability Exposure	The certificate is described as indicative but not legally insulated.	Developers may rely on the certificate for marketing commitments.	Insert explicit regulatory clarification that DCRA's shall not be liable for deviations during construction beyond documented design-stage assessment.
Fee Structure	Design-stage assessment and monitoring require additional professional effort.	Without fee flexibility, quality of evaluation may suffer.	Explicitly allow separate fee structures for: (i) design-stage evaluation, (ii) construction monitoring, and (iii) final rating.

3. Proposed Amendment III – Reclassification of Property Types

(Amendment to Regulation 3)

Clause Reference	Comment	Justification / Rationale	Suggestion
Regulation 3 – Movement of Hospitals, Hotels, Educational Institutions to Category A	The reclassification aligns with real in-building digital connectivity intensity.	These properties exhibit continuous indoor data demand similar to commercial complexes.	No objection; amendment supported.
Inclusion of Metro Corridors	Explicit inclusion enhances clarity.	Removes ambiguity in applicability.	No objection; amendment supported.

4. Proposed Amendment IV – Optional Digital Connectivity Audit

Clause Reference	Comment	Justification / Rationale	Suggestion
Optional Digital Connectivity Audit Framework	The audit mechanism creates constructive ecosystem enhancement and commercial opportunity for DCRA's.	Encourages pre-rating improvement culture.	No objection; supported in principle.

Clause Reference	Comment	Justification / Rationale	Suggestion
Audit and Rating by Same DCRA	Where a DCRA provides consultancy and audit services, conflict perception may arise during final rating.	Independence perception is critical to rating credibility.	Require mandatory disclosure on the rating platform if the same DCRA conducted prior audit or consultancy for the property.
Audit Report Status	Audit reports may be misused as indicative ratings.	Could dilute integrity of formal rating framework.	Mandate standardized language in audit report stating that it is non-binding and does not guarantee final rating outcome.

5. Amendment to Schedule-I – Impartiality and Independence Clause

Clause Reference	Comment	Justification / Rationale	Suggestion
Schedule-I – Impartiality Clause	The clause restricting DCRA's providing DCI services from assessing properties where another DCRA provided DCI services may create interpretational ambiguity.	Many DCRA's (including ours) provide consultancy in addition to rating. Undefined scope of "providing DCI services" may unintentionally disqualify legitimate participation.	Clarify whether: (i) advisory consultancy constitutes "providing DCI services"; (ii) group/affiliate entities are included; (iii) technology integration advisory qualifies. Provide definitional clarity.

Additional General Comments

1. Appeal Mechanism

With the proposed introduction of half-star rating levels, the score bands become narrower, which may increase the possibility of marginal differences in scoring affecting the final star rating. From a stakeholder perspective, it may be helpful if the framework provides a **clear escalation or review mechanism** for such cases. A defined process for review of scoring or documentation could help ensure transparency and maintain confidence in the rating framework among property managers and rating agencies.

2. Standardized Documentation Framework

To promote uniformity in assessments conducted by different Digital Connectivity Rating Agencies (DCRA's), it may be useful if TRAI considers providing a **standardized documentation checklist and digital evidence protocol**. Such guidance could help minimize interpretational variations during assessments and ensure greater consistency across the ecosystem.

3. Defined Timelines for Property Manager Compliance

During the Due Diligence stages, delays sometimes arise due to pending responses or documentation from property managers. It may therefore be helpful if the framework indicates **indicative timelines for responses from property managers** during the evaluation process. This could assist in smoother coordination between property managers and DCRA and help maintain predictable assessment timelines.

4. Liability Considerations for DCRA

Digital connectivity performance within a property may be influenced by several external and dynamic factors such as telecom service provider network conditions, tenant-level infrastructure modifications, spectrum deployment, or structural changes made after certification.

From a stakeholder perspective, it may be beneficial if the framework clarifies that **DCRA assessments relate specifically to the evaluated Digital Connectivity Infrastructure (DCI)** and that performance variations arising from factors beyond the assessed infrastructure may fall outside the scope of the certification.

5. Consideration for Heritage Sites

Heritage sites are presently included under Government properties; however, such properties often operate under strict architectural and conservation guidelines. Installation of digital connectivity infrastructure—particularly In-Building Solutions (IBS), cabling, or structural modifications—may sometimes be limited due to preservation requirements.

At the same time, improved digital connectivity at heritage locations can significantly support **tourism services, visitor information systems, digital ticketing, guided tours, and safety communications**.

In this context, it may be worthwhile for the Authority to consider whether **heritage sites could be evaluated under a slightly adapted scoring approach or treated as a distinct category**, taking into account the infrastructure limitations associated with such locations while still promoting improved connectivity for tourism and public services.

6. Clarification on Fee Applicability for Different Property Sizes

During discussions with property developers and property managers, queries have been raised regarding the applicability of the regulatory fee for properties of significantly different sizes—for example, properties of **100,000 sq. ft. versus 1,000,000 sq. ft.** built-up area.

Stakeholders would appreciate clarification on whether the **applicable fee remains uniform irrespective of property size**, or whether there may be any variation based on property area or scale of infrastructure assessment. Greater clarity on this aspect may help property managers better understand the cost implications of participating in the rating framework.

7. Standardization of Drive Test Applications and Measurement Tools

At present, multiple mobile applications and tools are used in the market for conducting network drive tests and connectivity performance measurements, including publicly available applications such as **TRAI MySpeed**, along with several third-party network testing tools.

Since these tools may differ in terms of testing methodology, sampling frequency, averaging logic, and measurement parameters, the resulting datasets may sometimes vary even when measurements are conducted at the same location.

From a stakeholder perspective, it may therefore be helpful if the Authority considers providing **guidance or a reference list of approved or recommended testing applications and measurement tools** for use by Digital Connectivity Rating Agencies (DCRAs) during connectivity performance evaluation.

Such guidance could help:

- Improve **consistency of data collected across different DCRAs**
- Reduce **developer complaints regarding variations in reported performance**
- Prevent **disputes arising from different testing tools and methodologies**
- Enhance **comparability and reliability of reported connectivity performance**
- Strengthen overall confidence in the digital connectivity rating framework

Alternatively, TRAI may consider specifying **minimum technical parameters or measurement standards** for drive testing, while still allowing flexibility in tool selection provided those standards are met.

CONCLUSION

We support the Authority's objective of enhancing transparency, differentiation, and early-stage visibility of Digital Connectivity Infrastructure. However, as a DCRA engaged in both rating and consultancy services, it is critical that:

- Conflict-of-interest boundaries are clearly defined,
- Design-stage certification liability is appropriately limited,
- Monitoring scope is clearly delimited, and
- Audit mechanisms preserve rating integrity.

We remain committed to upholding independence, impartiality, and professional rigor in digital connectivity assessments.