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Subject: ISPAI Response to TRAI Consultation Paper on ‘Review of Rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024)’

Dear Sir,

We thank the Authority for providing us the opportunity to submit our response on this important subject. We appreciate TRAI’s continued efforts toward strengthening the Digital Connectivity Rating framework and aligning it with practical deployment realities across diverse property categories.

The key observations on:

- The introduction of half star rating levels;
- The proposed design stage evaluation mechanism for under construction properties;
- The revised categorisation of property types;
- The optional Digital Connectivity Audit framework; and
- additional recommendations for enhanced transparency, implementation clarity, and ecosystem readiness.

We believe these refinements will significantly improve the robustness, usability, and adoption of the Digital Connectivity Rating framework, ultimately benefiting property developers, service providers, and consumers.

We have enclosed our response at Annexure -I for your consideration.

We believe that the Authority would consider our submissions positively on the subject matter.

Thanking you,

Yours Sincerely,
For Internet Service Providers Association of India



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Annexure-I

ISPAI comments to TRAI Consultation Paper on ‘Review of Rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024)’

Name of the Commentator/ Organization: Internet Service Providers Association of India (ISPAI)

S.No.	Regulation No./ Rating Manual reference/ Subject	Comments/ modified wordings	Suggested Justification for Comments/ Suggestions
1.	General Comment	<p>Certainty is required on cost allocation for enabling telecom infrastructure for a property and explicitly state the role of the Property Manager.</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>This will also prevent cost recovery from Service Providers in the form of access fees, revenue share arrangements or IBS linked premiums.</p>
2.	General Comment	<p>Implementation of Common Minimum Program by Property Manager to ensure non-discriminatory, transparent, and technology-neutral access to digital connectivity infrastructure for all licensed Telecom Service Providers (TSPs) seeking entry into the premises.</p>	<p>In accordance with the intent of the TRAI Draft Digital Connectivity Rating Regulations, it is essential that a clear, enforceable, and transparent mechanism be prescribed to ensure non-discriminatory access to in-building digital connectivity infrastructure for all licensed Telecom Service Providers (TSPs) approaching a property manager.</p> <p>For ensuring the same, it is proposed that the Property manager should be obligated to implement the common minimum program to provide uniform access conditions,</p>

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			<p>timelines, and commercial terms to all authorized TSPs, without exclusivity or preferential arrangements.</p> <p>In the Common minimum program, property Manager should have standardized processes for access requests, escalation and grievance redressal, and disclosure of existing infrastructure to ensure consistency, transparency, and effective implementation of the Digital Connectivity Rating regime.</p> <p>Such a mechanism would prevent the creation of monopolistic access at the property level, promote fair competition among service providers, and enable end-users to exercise meaningful choice.</p>
3.	General Comment	Property Manager to ensure clear distinction and earmarking of the digital infrastructure for each Digital Service Provider for faster and unconditional access to the property.	<p>The Draft Digital Connectivity Rating Regulations should require property managers to clearly distinguish, and earmark dedicated digital connectivity infrastructure for each Digital Service Provider (DSP) intended to avail digital infrastructure within the property. Such clear demarcation and documentation of infrastructure would enable faster, transparent, and unconditional access for service providers, reduce operational dependency on the property manager for routine access, and prevent disputes or delays arising from shared or ambiguously allocated facilities. This approach would support efficient network deployment, simplify maintenance and upgrades, and align with the principles of non-discriminatory and technology-neutral access</p>

			envisaged under the proposed regulatory framework.
4.	Sections 4.8 and 5.6 titled 'Service Performance',	<p>Reconsider the proposed speed criteria, namely 'average minimum download speed of 10 Mbps for 4G or 100 Mbps for 5G technology, as applicable.' The speed criteria below may be considered instead:</p> <ul style="list-style-type: none"> ▪ For 4G: throughput equal to or better than 2 Mbps, measured as successful file download test cases in percentage; ▪ For 5G: a 100 MB file to be downloaded at each selected test location within 5 minutes. 	The proposed speed criteria align with the MRO benchmark, which are the only available speed benchmarks that a TSP is obligated to meet as per its license conditions while offering service to the Retail users.
5.	Sections 4.8 and 5.6 of the Manual	While TRAI has rationalised weightage for mobile and Wi-Fi coverage, it may be considered to further rationalise the weightage in order to reflect retail users' use of public wi-fi and mobile connectivity.	<p>Mobile connectivity is the primary mode of connectivity for subscribers and needs to be consistent and robust within an indoor environment in order for accessing telecom services. Use case for [public] Wi-fi is in limited situations and most users may not even opt-in for the service.</p> <p>use case for [public] Wi-fi is in limited situations and most users may not even opt-in for the service.</p> <p>Considering above, TRAI is requested to drop the weightage for Wi-Fi coverage and instead include a category for Fixed Wireless access.</p>
6.	4.9.1. Sub-Criteria: User feedback on digital connectivity experience	The survey questionnaire should be carefully designed to minimise ambiguity and user bias/subjectivity.	<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</p>

			<p>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>
7.	General Comment	Ensure harmonised implementation of associated regulatory instruments such as the DCIP framework, National Building Code, and Model building bye-laws.	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.
8.	General Comment	It is recommended that the rating of properties for digital connectivity readiness be made mandatory at the time of obtaining the Completion Certificate (CC) from the concerned Municipal Authority or any other competent State authority. Promoters/developers should be required to ensure that buildings are assessed for digital infrastructure preparedness prior to issuance of the Completion Certificate.	<p>In view of the increasing dependence on digital infrastructure and services, it is essential that properties are assessed and rated for their digital connectivity readiness. This will ensure better service quality, transparency, and preparedness for future communication needs.</p> <p>Property Manager should also maintain complete transparency about the readiness of digital infrastructure to all intended users.</p>