RJIL/TRAI/2025-26/751
30th March 2026

To,

Shri Tejpal Singh,
Advisor (QoS-I)
Telecom Regulatory Authority of India,
Tower-F, World Trade Centre,
Nauroji Nagar, New Delhi – 110029.

Subject: **RJIL's comments on TRAI's Consultation Paper on Review of Rating of Properties for Digital Connectivity Regulations, 2024.**

Dear Sir,

Please find enclosed the comments of Reliance Jio Infocomm Limited (RJIL) on the TRAI's **Consultation Paper on Review of Rating of Properties for Digital Connectivity Regulations, 2024** dated 27.02.2026.

Thanking you,

Yours Sincerely,
For **Reliance Jio Infocomm Limited**

KAPOOR SINGH GULIANI

Digitally signed by KAPOOR SINGH GULIANI
Date: 2026.03.30 12:38:25 +05'30'

Kapoor Singh Guliani
Authorized Signatory

Enclosure: As above

Reliance Jio Infocomm Limited's comments on TRAI's "Consultation Paper on Review of Rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024)" dated 27th February 2026

1. Reliance Jio Infocomm Limited (RJIL) thanks the Authority for giving an opportunity to offer comments on the **Draft amendment to the Rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024) and the Manual for Assessment of Digital Connectivity under Rating of properties for Digital Connectivity Regulations, 2024**.

2. At the very outset, we submit that the proposals under the draft amendment viz. **broadening the Five-Star rating system by including additional levels; rating of Under Construction Properties to facilitate the customer awareness of rating while buying an under-construction buildings by introducing a design-stage assessment and certification mechanism for under-construction properties are welcome measures**. We also agree with the proposal to realigning certain property types between Category ' A' and Category ' B' to ensure consistency, relevance, and effectiveness of the assessment framework and obtain optional ratings and then get formal rating by improving the overall level of Digital Connectivity Infrastructure (DCI) in their properties. We submit that these are positive measures and should be included in the Regulations and Manual.

3. Notwithstanding the above, we submit that there are many reasonable and rational proposals that were shared with the Authority previously to make the rating of buildings more effective but have not been accepted and we request the Authority to reconsider the same. We are bringing your kind attention to these issues once again in following paras.

A. The need for a multi-sectoral advisory body

4. We reiterate our submissions that this Regulation is a positive step to improve Digital Connectivity Infrastructure ('DCI') inside the buildings and other constructed areas and understand that with the implementation of Regulation for Rating of buildings, necessary impetus will be given to inclusion of the requisite DCI in the building plans for new buildings, while simultaneously incentivizing the property managers of the older buildings to devise ways to install DCI so that their building value can improve. **This Manual and the Regulation will help create an ecosystem for planning, designing, installation and rating of DCI on the similar lines as is being done in case of civil and electrical engineering works.**

5. Therefore, it is all the more relevant that the provisions for setting up the Advisory Committee are invoked urgently and a committee consisting of relevant stakeholders including representative from academia, Ministry of Housing and Urban Affairs (MoHUA), DoT, CoDCI, BIS, TSPs/ISPs, Multi-System-Operators(MSOs),CREDAI, etc. to advise on the matters related to proliferation, popularisation and adoption of rating framework, should be formulated at the start of the process itself. We reiterate that rating of buildings being a new concept, the Authority should leverage all possible support to popularize the same at initial stage itself.

6. We also reiterate our submission that the DCI implementation should be backed by the law. For instance, RERA act does not cover DCI at present. Mandating digital connectivity inside the buildings and ensuring that this is available to all stakeholders on non-discriminatory basis should be incorporated in the builder-buyer agreement for covering it under the jurisdiction of this Act and its enforceability by the RERA.

B. Smoothening the rollouts and non-discriminatory approach towards new technologies like Fixed Wireless Access

7. We once again submit that all these efforts become useless, if the persisting roadblocks and bottlenecks preventing roll out of digital infrastructure in buildings and in approach to the buildings are not addressed.

8. We submit that the most recent key technological successes in delivering broadband to homes is through Fixed Wireless Access (FWA) , which bypasses the challenge of accessing the building through Fiber and is already supporting over 15 million homes with Home Broadband and is the fastest expanding broadband technology. However, the manual and the Regulations have not given adequate importance infrastructure support for this technology.

9. We submit that it is imperative that the buildings support the access and installation of FWA ODCPEs and it should have requisite weightage in the assessment methodology. Accordingly, we have once again proposed the changes in assessment methodology in subsequent parts of this document.

10. We further submit that while the Authority has been rightfully recognizing the role and importance of DCI and In-Building Solutions ('IBS') and the need for non-discriminate access to buildings at reasonable costs, but the need for infrastructure supporting IBS to meet the requirements of higher floors in a building has not been adequately addressed. We submit that there is a need to emphasize the IBS infrastructure support to cover entire building.

11. The Authority has rightly added the compliance with National Building Code ('NBC'), Model Building Bye Laws ('MBBL') and other relevant regulations in rating mechanism, but we understand that the provision for DCI should also be included as part of these regulation and approvals, as this will be critical to provide a legal backing to the digital connectivity and rating of buildings eco-system.

C. Unnecessary and undue focus on Public Wi-Fi and support for future bands in assessment methodology.

12. We reiterate our submissions that public Wi-Fi does not have a critical role in delivering connectivity in residential buildings, however, it retains substantial rating value in assessment methodology. We request the Authority to reevaluate this position with realistic expectation.

13. It is submitted that broadband connectivity requirements of majority of residential buildings or standalone buildings will be served by the Fixed, FWA and Mobile Broadband and there will be no relevance of secure public Wi-Fi in these buildings. Neither will it be monetizable to deem any investments nor will it be useful for the residents already connected with mobile and fixed broadband.

14. Thus, inclusion of secure Wi-Fi is an unnecessary inclusion in rating criteria. Further, with rising proliferation of affordable mobile as well as fixed line broadband services, the availability of public Wi-Fi is no more an essential service, and therefore not relevant for the purpose of rating of building.

15. Similarly, the inclusion of secure Public Wi-Fi is non-public areas, under Assessment Methodology for Category 'A' properties is unnecessary. As in non-public areas, the availability of Wi-Fi will be a function of the property owner or property users' choice and may lead to unnecessarily skewed ratings, that will not reflect the actual status of DCI in buildings.

16. Another point being repeatedly used in the Assessment methodology is the **"support for future bands"** under mobile communications. We submit this is completely beyond the scope of a property manager's job. In a rapidly evolving technology scenario, where even the operators, regulators and device OEMs do not have clear visibility on device ecosystem development for future bands, we cannot expect the property manager to deliver on this premise and to assessing authority to objectively assess this requirement.

17. We understand that the objective is to ensure support for integration of future wireless communication bands and evolving wired and mobile technologies.

However, the emphasis on verifying whether the RF infrastructure installed like radio units, baseband units, duplexers, combiners, and transmitters, as applicable, are capable for supporting upcoming technologies and frequency bands is not realistic.

18. We submit many new bands may require separate antennas and basebands, which can be installed only when the suitable equipment is available for installation, so future readiness of the building cannot be judged on these criteria especially where there will be no Bill of Material installed at property to verify the same. We submit that support should be restricted to current and already auctioned wireless bands and the property manager should be required to ensure that support to all existing bands is provided. Therefore, we submit that this measure should be removed from the assessment methodology and there should be a mandate to ensure that the property supports all existing spectrum bands.

D. Role of Telecom Service Providers

19. We agree that the effective deployment of best-in-class DCI in the buildings can only be done through a collaboration between Property Managers and Telecom Service Providers (TSPs) and/or IP-1 providers acting at the behest of TSPs. However, the rating of buildings will be sole responsibility of the Property Managers and TSPs have no obligatory role in delivering the same.

20. Therefore, it is reiterated that the provisions of the manual cannot be a binding obligation on the TSPs such as to facilitate surveys or other activities required for rating of buildings. Further, as per the license provisions, the TSP's mandatory coverage requirements are limited to the roll-out obligations and the manual cannot change the coverage parameters as an obligatory one. Therefore, we submit that all measurements of coverage for rating of buildings should not be made as obligatory for TSPs, and the Property Manager should be solely responsible for carrying out these activities through various available means on mutual agreement basis.

21. Further, under the table for compliance requirements in the manual, the minimum download speed of 10Mbps for 4G or 100 Mbps for 5G technology is mentioned for compliance requirements. We submit that these limits are not in line with the TSTPs for coverage testing and the Manual should be revised to align with TSTP minimum download speed for coverage testing.

E. Role of Property Managers

22. It is submitted that the manual should clearly spell out that all cost obligations pertaining to the rating of buildings or enhancing the DCI infrastructure in the property

will solely lie with the property managers. The property managers can align with the TSPs or their associated IPs for planning and execution of DCI enhancement at mutually agreed commercial arrangements.

23. We submit that acceptance of the Authority's recommendation that the Government buildings should mandatorily come under the Rating framework, should not become a case of 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 other public buildings like metro/railway stations, airports etc.

24. The Authority should explicitly mention in the Regulations that the cost and ownership for DCI in a building would have to be borne by the Property Managers (including Government bodies wherever applicable) and a suitable commercial agreement linked to actual cost of deployment should be executed by them with the respective TSPs/ISPs. Further, in case of failure to reach mutually agreed commercial terms, the TSPs should be facilitated to lay the infrastructure at their own cost.

25. Further, there should be enforceable provisions to prevent Property Managers from entering into exclusive arrangements with a TSPs or an IP. The DCI infrastructure in a building or property should be available in non-discriminatory manner to all service providers of fixed and mobile connectivity. The Property Manager's responsibilities will include to ensure sufficient provisions in the in-building network so that the envisaged number of service providers, as per Manual, can plug-in and offer the services in a seamless manner.

26. As submitted earlier, in line with Singapore and European countries model, the requirement of interoperability in last mile network infrastructure should be adopted as a best practice. Thus, the DCI installed by the Property Managers should be interoperable and compatibility with all TSPs/ISPs. The end customer should have the option to toggle between the network providers. This will ensure that IPs and DCIPs create and maintain the DCI which can be utilized by all TSPs as per the customer requirements.

F. Revised Criterion Assessment Methodology for Category 'A' properties

27. The following revised criterion with justification is provided below to include all the submissions is previous paras. We submit that this should be accepted and accordingly suitable changes are made in Category 'B' properties.

Criteria No.	Criteria (a)	Weightage (b)	Sub-Criteria (c)	Sub-Criteria weightage (Revised)	Justification
4.1	Compliance to applicable Model Building Bye Laws (MBBL) and National Building Code (NBC) for digital connectivity	5	4.1.1 Approved DCI design	2.5	No Change
			4.1.2 DCI implementation as per approved DCI design	2.5	No Change
4.2	Provision in civil infrastructure, over and above MBBL and NBC requirements, for ensuring robust digital connectivity	5	4.2.1 Provision for expansion of telecom rooms and cable pathways	2	No Change
			4.2.2 Provision for expansion of mobile and ~~wireline~~ Fixed connectivity	2	No Change
			4.2.3 Ease of access of DCI installed for repair or maintenance	1	No Change
4.3	Provision in power infrastructure, over and above MBBL or NBC requirements, for ensuring reliable digital connectivity	5	4.3.1 Redundancy of power source	1	No Change
			4.3.2 UPS power backup for DCI	2	No Change
			4.3.3 Power continuity monitoring	1	No Change
			4.3.4 Building Management System	1	No Change
4.4	Digital Connectivity	10	4.4.1 Availability of alternate entry paths for digital	3	No Change

Criteria No.	Criteria (a)	Weightage (b)	Sub-Criteria (c)	Sub-Criteria weightage (Revised)	Justification
	Infrastructure Resilience		connectivity infrastructure		
			4.4.2 Non-flooding measures for DCI installation	3	No Change
			4.4.3 Implementation of redundancy in power source and DCI paths	4	No Change
4.5	Future Readiness of Digital Connectivity Infrastructure	~~10~~ 5	4.5.1 Availability of the latest generation of mobile connectivity	~~4~~ 2.5	
			~~4.5.2 Support for future bands~~	~~3~~ 0	To be removed as Property managers will have no control on this.
			4.5.3 Upgradability of ~~wireline~~ Fixed DCI	~~3~~ 2.5	This is a key measure for future readiness.
4.6	Provision of Fixed Connectivity infrastructure	~~20~~ 30	4.6.1 Backhaul fiber connectivity (service provider to property)	10	10
			4.6.2 Fixed Wireless Access Connectivity	10	FWA will be meeting a large part of demand for Fixed connectivity
			4.6.2 Fiber connectivity till user premises	5	No Change

Criteria No.	Criteria (a)	Weightage (b)	Sub-Criteria (c)	Sub-Criteria weightage (Revised)	Justification
			4.6.3 Fiber connectivity in each room or office or commercial space	5	No Change
4.7	Availability of Service Providers	15	4.7.1 Number of wireline Internet Service providers having integration with Digital Connectivity Infrastructure	7.5	No Change
			4.7.2 Number of Mobile Service providers having coverage or integration with Digital Connectivity Infrastructure	7.5	No Change
4.8	Service Performance	~~25~~ 20	4.8.1 Mobile network coverage and performance in public areas of property	~~6~~ 7.5	Mobile coverage is the most important metric in coverage and should be weighted accordingly.
			~~4.8.2 Secure public Wi-Fi network coverage and performance in public areas of property~~	~~4~~	To be removed as not relevant to most buildings
			4.8.3 Mobile network coverage and	~~5~~ 7.5	Mobile coverage is the most

Criteria No.	Criteria (a)	Weightage (b)	Sub-Criteria (c)	Sub-Criteria weightage (Revised)	Justification
			performance in non-public areas		important metric in coverage and should be weighted accordingly.
			~~4.8.4 Secure public Wi-Fi network coverage and performance in non-public areas~~	~~5~~	The property manager has no control on this and this will be a subset of consumer choice and availability of Fixed connectivity
			4.8.5 Average download speed of different wireline network(s) in respective highest speed plan	5	5
4.9	User Experience	5	4.9.1 User feedback on digital connectivity experience	5	5