

Respected Sirs

Subject: Suggestions for Improving Operational Clarity and Implementation of the Rating Manual under the "Rating of Properties for Digital Connectivity Regulations, 2024"

We respectfully submit the following suggestions for consideration with regard to improving the operational clarity, standardization, and user-friendliness of the Rating Manual issued under the "Rating of Properties for Digital Connectivity Regulations, 2024".

The framework notified by the Authority is comprehensive and forward-looking.

However, from an implementation perspective, incorporation of certain structured operational tools may significantly enhance ease of compliance for Property Managers and ensure uniformity in assessment by Digital Connectivity Rating Agencies (DCRAs).

In this regard, the following suggestions are respectfully submitted for consideration.

1. Introduction of Structured Compliance Checklist

It is recommended that the Rating Manual include a structured, criterion-wise Yes/No compliance checklist in tabular format for Category 'A' and Category 'B' properties

2. Standardized Assessment Completion Checklist for DCRAs

To further strengthen uniformity and regulatory oversight, it is suggested that the Authority prescribe a standardized "Assessment Completion Checklist" to be mandatorily filled by DCRAs prior to issuance of the rating certificate.

3. Clear Differentiation of Stage I and Stage II Criteria

For ease of implementation, it is suggested that evaluation criteria be clearly classified into the following categories:

4. Compliance Summary Dashboard

It may also be useful to prescribe a standardized compliance summary sheet capturing the following key parameters:

5. Digital Platform Automation

The Digital Connectivity Rating Portal may be aligned with the structured checklist framework.

6. Wider Adoption of Property Rating Framework

It has been observed that Property Managers and Developers may not always be inclined to voluntarily obtain digital connectivity ratings for their premises, particularly where the perceived benefits are not clearly defined.

7. Access to EMF Portal for DCRA's

During drive testing and on-site verification of properties, DCRA's may require information regarding nearby telecom infrastructure and network availability in order to assess coverage gaps and provide meaningful recommendations.

Conclusion

The digital connectivity rating framework is a significant step toward strengthening digital infrastructure readiness in properties across the country. Incorporation of structured operational tools, improved role clarity, and platform-based automation would enhance scalability, consistency, and regulatory robustness without altering the regulatory intent or scoring methodology.

Accordingly, the following supporting annexures are enclosed for consideration:

1. Annexure-I: Structured Compliance Checklist – Category 'A' Properties
2. Annexure-II: Structured Compliance Checklist – Category 'B' Properties
3. Annexure-III: Suggested Digital Rating Portal Workflow
4. Annexure-IV: Suggested Star Rating Scoring Matrix

These suggestions are submitted in a constructive spirit with the objective of supporting effective implementation of the regulatory framework.

We thank the Authority for providing the opportunity to submit our views.

Yours sincerely,
Sanjeev Goel
Chief Business Officer
Shaurya Teleservices Pvt. Ltd

Annxure-1

DRAFT ANNEXURE

Structured Compliance Checklist Framework

for Category 'A' Properties

Under the

Rating of Properties for Digital Connectivity Regulations, 2024

1. Background and Rationale

1.1 The Rating Manual issued under the "*Rating of Properties for Digital Connectivity Regulations, 2024*" provides a comprehensive methodology for assessment of Digital Connectivity Infrastructure (DCI) across different categories of properties.

1.2 During implementation and stakeholder interactions, it has been observed that while the Manual provides detailed criteria and scoring methodology, the assessment framework is primarily descriptive in nature.

1.3 For ease of implementation, standardization of assessment practices, and improved transparency, it is considered appropriate to introduce a structured compliance checklist format that operationalizes the prescribed criteria in a uniform and measurable manner.

1.4 The structured checklist shall serve as an operational tool for:

- Property Managers,
- Digital Connectivity Rating Agencies (DCRAs), and
- Regulatory oversight and audit review.

1.5 This checklist does not amend, dilute, or modify any provision of the Regulations or the Rating Manual. It provides a standardized format for compliance verification and documentation in order to ensure consistency in assessment.

2. Applicability

2.1 This Annexure shall apply to all Category 'A' properties seeking digital connectivity rating under the Regulations.

2.2 The checklist shall be used during:

- Due Diligence Stage I (*Document Review and Preliminary Assessment*),
 - Due Diligence Stage II (*On-site Verification and Performance Assessment*),
and
 - Optional Digital Connectivity Audit, where applicable.
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3. General Instructions

3.1 Each requirement shall be marked as:

- Yes (Compliant)
- No (Non-Compliant)
- Not Applicable (NA)

3.2 Each requirement shall be categorized as:

- Mandatory,
- Recommended, or
- Optional.

3.3 Where a requirement is marked as "Mandatory", and compliance is recorded as "No", the property shall not be eligible to proceed to the next stage of assessment until such non-compliance has been rectified.

3.4 All responses shall be supported with documentary evidence, drawings, test reports, or physical verification, as applicable.

3.5 The completed checklist shall form part of the permanent assessment record and shall be digitally maintained on the rating platform for audit and regulatory reference.

4. PROPERTY INFORMATION SHEET

Particulars	Details
Property Name	
Property Identification Number	
Property Address	
Sub-Category (Residential / Commercial / Government / Hospital / Hotel / Educational Institution)	
Built-up Area (in sqm)	
Stage of Assessment (Stage I / Stage II)	
Name of DCRA	
Date(s) of Assessment	

5. STRUCTURED COMPLIANCE CHECKLIST – CATEGORY 'A'

5.1 Civil Infrastructure (MBBL/NBC and Digital Connectivity Provisions)

Code	Requirement	Yes	No	N/A	Category (Mandatory/Recommended/Optional)	Drawing / Evidence Reference	Remarks
CI-1	Dedicated telecom room provided	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		
CI-2	Telecom room dimensions compliant with applicable standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		

Code	Requirement	Yes	No	NA	Category (Mandatory/Recommended/Optional)	Drawing / Evidence Reference	Remarks
CI-3	Vertical telecom shafts provided	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		
CI-4	Horizontal cable pathways provided	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		
CI-5	Fiber entry point defined and accessible	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		
CI-6	Multiple fiber entry provision	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended		
CI-7	Provision for IBS/DAS infrastructure space	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Conditional		
CI-8	Roof access for antenna installation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		

5.2 Power Infrastructure for Digital Connectivity

Code	Requirement	Yes	No	NA	Category	Evidence	Remarks
PI-1	Dedicated power supply for telecom infrastructure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		
PI-2	UPS backup provided for telecom equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		

Code	Requirement	Yes	No	NA	Category	Evidence	Remarks
PI-3	DG backup provision	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended		
PI-4	Redundant power feed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Optional		
PI-5	Proper earthing and surge protection implemented	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		

5.3 Digital Connectivity Infrastructure (DCI)

5.3.1 Fiber and Wired Connectivity

Code	Requirement	Yes	No	NA	Category	Remarks
DCI-1	Fiber termination available within the building	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory	
DCI-2	Provision for minimum two fiber providers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended	
DCI-3	Structured backbone cabling implemented	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory	
DCI-4	FTTH provision implemented	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory	

5.3.2 Wireless Readiness

Code	Requirement	Yes	No	NA	Category	Remarks
WR-1	DAS provision (where applicable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Conditional	
WR-2	Small cell readiness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended	
WR-3	5G-ready infrastructure support	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended	

5.4 Service Provider Availability

Code	Parameter	Observed Value	Meets Threshold (Yes/No)	Remarks
SA-1	Number of Telecom Service Providers available		<input type="checkbox"/> Yes <input type="checkbox"/> No	

Code	Parameter	Observed Value	Meets Threshold (Yes/No)	Remarks
SA-2	Number of broadband providers available		<input type="checkbox"/> Yes <input type="checkbox"/> No	
SA-3	Active fiber connections		<input type="checkbox"/> Yes <input type="checkbox"/> No	

5.5 Performance Metrics (Applicable at Stage II)

Code	Parameter	Measured Value	Prescribed Threshold	Compliant (Yes/No)	Remarks
PM-1	Average Download Speed			<input type="checkbox"/> Yes <input type="checkbox"/> No	
PM-2	Average Upload Speed			<input type="checkbox"/> Yes <input type="checkbox"/> No	
PM-3	Reference Signal Received Power (RSRP)			<input type="checkbox"/> Yes <input type="checkbox"/> No	
PM-4	Network Latency			<input type="checkbox"/> Yes <input type="checkbox"/> No	

6. USER EXPERIENCE (QoE) ASSESSMENT

Code	Requirement	Compliant (Yes/No)	Sample Size	Remarks
QE-1	End-user survey conducted	<input type="checkbox"/> Yes <input type="checkbox"/> No		
QE-2	Satisfaction level meets prescribed benchmark	<input type="checkbox"/> Yes <input type="checkbox"/> No		
QE-3	Complaint redressal mechanism available	<input type="checkbox"/> Yes <input type="checkbox"/> No		

7. FINAL ELIGIBILITY SUMMARY

Particulars	Details
Total Mandatory Requirements	
Mandatory Requirements Complied	

Particulars	Details
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Mandatory Requirements Not Complied

Eligible for Next Stage (Yes/No)

Observations of DCRA

8. Certification and Record

The undersigned confirms that the above checklist has been completed based on documentary verification and/or physical inspection, as applicable, in accordance with the provisions of the Rating Manual and applicable Regulations.

Lead Assessor (DCRA):

Name:

Signature:

Date:

Technical Reviewer (DCRA):

Name:

Signature:

Date:

DRAFT ANNEXURE

Structured Compliance Checklist Framework

for Category 'B' Properties

Under the

Rating of Properties for Digital Connectivity Regulations, 2024

1. Background and Rationale

1.1 The Rating Manual issued under the “*Rating of Properties for Digital Connectivity Regulations, 2024*” provides the methodology for evaluation of Digital Connectivity Infrastructure (DCI) across various categories of properties including transport corridors, public spaces, and other high-footfall infrastructure.

1.2 Category 'B' properties typically include large public infrastructure areas such as airports, railway stations, bus terminals, transport corridors, stadiums, and other locations with high user density and mobility.

1.3 Due to the unique operational characteristics of such properties, including large geographic coverage, variable user density, and multi-operator service environments, it is important that the assessment process remains structured and standardized.

1.4 Accordingly, it is proposed that a **structured compliance checklist format** be adopted for Category 'B' properties to facilitate consistent assessment and documentation.

1.5 This checklist shall function as an operational tool for:

- Digital Connectivity Rating Agencies (DCRAs),
 - Property Managers / Infrastructure Authorities, and
 - Regulatory review and audit processes.
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2. Applicability

2.1 This Annexure shall apply to all Category 'B' properties seeking digital connectivity rating under the Regulations.

2.2 Category 'B' properties may include:

- Airports
- Railway Stations
- Bus Terminals
- Metro Stations
- Stadiums or Sports Arenas
- Transport Corridors
- Other public infrastructure areas with high user density.

2.3 The checklist shall be used during:

- Due Diligence Stage I (*Document Review*),
 - Due Diligence Stage II (*On-site Verification and Performance Testing*), and
 - Optional Digital Connectivity Audit.
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3. General Instructions

3.1 Each requirement shall be marked as:

- **Yes (Compliant)**
- **No (Non-Compliant)**
- **Not Applicable (NA)**

3.2 Each requirement shall be categorized as:

- **Mandatory,**
- **Recommended,** or
- **Optional.**

3.3 If any **Mandatory requirement** is marked as **No**, the property shall not be eligible to proceed to the next stage of assessment until rectified.

3.4 Compliance shall be supported through documentary verification and/or physical inspection.

3.5 The completed checklist shall form part of the **official assessment record** maintained by the DCRA.

4. PROPERTY INFORMATION SHEET

Particulars	Details
Property Name	
Property Identification Number	
Location / Address	
Property Type (Airport / Station / Stadium / Corridor etc.)	
Area Coverage	
Stage of Assessment (Stage I / Stage II)	
Name of DCRA	
Date(s) of Assessment	

5. STRUCTURED COMPLIANCE CHECKLIST – CATEGORY ‘B’

5.1 Power Infrastructure for Digital Connectivity

Code	Requirement	Yes	No	NA	Category	Evidence	Remarks
PB-1	Dedicated power supply available for telecom equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		
PB-2	UPS backup available for telecom equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		

Code	Requirement	Yes	No	NA	Category	Evidence	Remarks
PB-3	DG backup provision available	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended		
PB-4	Surge protection and earthing implemented	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory		

5.2 Digital Connectivity Infrastructure Resilience

Code	Requirement	Yes	No	NA	Category	Remarks
DR-1	Redundant telecom connectivity provision	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended	
DR-2	Infrastructure resilience planning implemented	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended	
DR-3	Protection against physical infrastructure disruption	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended	

5.3 Future Readiness of Digital Connectivity Infrastructure

Code	Requirement	Yes	No	NA	Category	Remarks
FR-1	Provision for small cell deployment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended	
FR-2	Provision for future fiber expansion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended	
FR-3	Infrastructure readiness for emerging technologies (e.g. 5G)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended	

5.4 Wired Connectivity Infrastructure

Code	Requirement	Yes	No	NA	Category	Remarks
WI-1	Fiber connectivity provision available	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mandatory	
WI-2	Structured cabling infrastructure provided	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended	
WI-3	Redundant fiber routes available	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recommended	

5.5 Availability of Service Providers

Code	Parameter	Observed Value	Meets Threshold (Yes/No)	Remarks
SP-1	Number of Telecom Service Providers available		<input type="checkbox"/> Yes <input type="checkbox"/> No	
SP-2	Availability of broadband / internet providers		<input type="checkbox"/> Yes <input type="checkbox"/> No	
SP-3	Active telecom infrastructure operators present		<input type="checkbox"/> Yes <input type="checkbox"/> No	

5.6 Service Performance (Stage II)

Code	Parameter	Measured Value	Threshold	Compliant (Yes/No)	Remarks
PM-1	Download Speed			<input type="checkbox"/> Yes <input type="checkbox"/> No	
PM-2	Upload Speed			<input type="checkbox"/> Yes <input type="checkbox"/> No	
PM-3	Network Signal Strength (RSRP)			<input type="checkbox"/> Yes <input type="checkbox"/> No	
PM-4	Network Latency			<input type="checkbox"/> Yes <input type="checkbox"/> No	

5.7 User Experience (QoE)

Code	Requirement	Compliant (Yes/No)	Sample Size	Remarks
QE-1	User feedback survey conducted	<input type="checkbox"/> Yes <input type="checkbox"/> No		
QE-2	Satisfaction benchmark achieved	<input type="checkbox"/> Yes <input type="checkbox"/> No		
QE-3	Complaint handling mechanism available	<input type="checkbox"/> Yes <input type="checkbox"/> No		

6. FINAL ELIGIBILITY SUMMARY

Particulars	Details
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Total Mandatory Requirements

Mandatory Requirements Complied

Mandatory Requirements Not Complied

Eligible for Next Stage (Yes/No)

Observations of DCRA

7. Certification and Record

The undersigned certify that the above checklist has been completed based on documentary review and/or physical verification, and the assessment has been conducted in accordance with the provisions of the Rating Manual and applicable Regulations.

Lead Assessor (DCRA)

Name:

Signature:

Date:

Technical Reviewer (DCRA)

Name:

Signature:

Date:

ANNEXURE – IV

Suggested Digital Rating Portal Workflow

Under the

Rating of Properties for Digital Connectivity Regulations, 2024

1. Objective

1.1 In order to improve efficiency, transparency, and automation in the rating process, it is suggested that the digital rating portal integrate a structured checklist-driven workflow.

1.2 The portal may facilitate standardized data submission, automated validation, and generation of assessment reports.

2. Suggested Workflow

The rating process may follow the steps below:

Step 1 – Registration

Property Manager registers on the Digital Connectivity Rating Platform.

Step 2 – Application Submission

Property Manager submits application for property rating along with required documents and design details of Digital Connectivity Infrastructure.

Step 3 – Automated Compliance Checklist

The portal generates a structured compliance checklist based on the property category.

Step 4 – Document Verification

DCRA verifies submitted documents and records observations on the portal.

Step 5 – Site Verification

DCRA conducts on-site inspection and updates verification results.

Step 6 – Performance Testing

Network performance parameters are measured and recorded.

Step 7 – Score Calculation

The system automatically calculates the score based on validated inputs and scoring methodology.

Step 8 – Rating Determination

The star rating corresponding to the score is generated.

Step 9 – Certificate Generation

Upon successful completion of assessment, the digital connectivity rating certificate is issued and published on the portal.

3. Expected Benefits

Implementation of the structured portal workflow will:

- Reduce manual processing errors,
- Improve transparency in assessment,
- Enable automated compliance validation,
- Facilitate faster rating issuance,
- Provide standardized data records for regulatory oversight.

Suggested Star Rating Scoring Matrix

Under the

Rating of Properties for Digital Connectivity Regulations, 2024

1. Objective

1.1 The purpose of this Annexure is to provide a transparent and standardized **score-to-rating mapping framework** for determining the Digital Connectivity Rating of a property after completion of the assessment process.

1.2 A clearly defined scoring matrix helps ensure:

- uniformity in assessment across Digital Connectivity Rating Agencies (DCRAs),
- transparency in rating outcomes,
- clarity for Property Managers regarding performance expectations, and
- improved interpretability of rating results by end users.

1.3 The scoring matrix proposed herein is aligned with the evaluation methodology prescribed in the Rating Manual and is intended to serve as an operational reference for determining the final rating.

2. Structure of Scoring Framework

2.1 The assessment score shall be computed based on cumulative performance across multiple evaluation categories.

2.2 The following broad assessment categories may contribute to the total score:

Sl. No.	Assessment Category
1	Civil Infrastructure for Digital Connectivity
2	Power Infrastructure for Telecom Equipment
3	Digital Connectivity Infrastructure (DCI)
4	Availability of Service Providers

Sl. No.	Assessment Category
5	Service Performance
6	User Experience (QoE)

2.3 Each category shall contribute to the total score based on weightages defined in the Rating Manual.

3. Calculation of Total Assessment Score

3.1 The total score for a property shall be calculated by aggregating scores achieved under each applicable evaluation category.

3.2 The maximum achievable score shall be **100 points**, unless otherwise revised by the Authority.

3.3 The rating shall be assigned based on the total score achieved during the assessment.

4. Suggested Star Rating Matrix

The following score ranges may be used to determine the Digital Connectivity Rating of the property:

Sl. No.	Score Range	Digital Connectivity Rating
1	25 – 32	1 Star
2	>32 – 40	1.5 Star
3	>40 – 48	2 Star
4	>48 – 56	2.5 Star
5	>56 – 64	3 Star
6	>64 – 72	3.5 Star
7	>72 – 80	4 Star
8	>80 – 88	4.5 Star
9	>88	5 Star

5. Mandatory Compliance Condition

5.1 Regardless of the score achieved, if any **mandatory compliance requirement** specified in the checklist framework is not satisfied, the property shall not be eligible for rating until such non-compliance is rectified.

5.2 The rating process shall therefore be subject to both:

- **Minimum mandatory compliance requirements**, and
 - **Score-based rating thresholds**.
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6. Interpretation of Star Ratings

For improved consumer understanding, the star ratings may broadly represent the following levels of digital connectivity readiness:

Rating	Indicative Interpretation
1 – 2 Stars	Basic digital connectivity readiness
2.5 – 3 Stars	Standard digital infrastructure provision
3.5 – 4 Stars	High-quality digital connectivity environment
4.5 – 5 Stars	Advanced digital infrastructure with superior performance

These interpretations are indicative and do not alter the technical assessment criteria.

7. Outcome of Rating Assessment

Upon completion of the assessment process:

- the total score shall be computed,
 - **the corresponding rating shall be determined based on the scoring matrix,**
 - the rating certificate shall be issued by the Digital Connectivity Rating Agency (DCRA), and
 - the rating shall be recorded on the Digital Connectivity Rating Platform for public reference.
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8. Review and Updates

The Authority may periodically review and update the scoring matrix and rating thresholds in order to reflect:

- technological advancements,
 - evolving digital infrastructure standards, and
 - stakeholder feedback.
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Certification

The Digital Connectivity Rating Agency shall confirm that the final rating has been determined strictly in accordance with the scoring methodology and the rating matrix prescribed under the Regulations and the Rating Manual.

Lead Assessor (DCRA)

Name:

Signature:

Date:

Technical Reviewer (DCRA)

Name:

Signature:

Date: