



30 March 2026

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

Subject: Tata Communications Limited's comments to TRAI Consultation Paper on Review of rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024)

Dear Sir,

This is with reference to the TRAI consultation dated 27-02-2026 titled "**Review of rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024)**"

In this regard, please find enclosed herewith Tata Communication Limited's response for your kind consideration as **Annexure**.

We earnestly request TRAI to kindly consider our submissions while finalizing the amendment to the Regulation and would be happy to provide any additional information, if required.

Thanking You,

Yours Sincerely,

**Alka Selot Asthana
Global Head - Regulatory
Tata Communications Limited**

Encl: as above



Annexure

Tata Communications Limited's Response on TRAI Consultation Paper on Review of rating of Properties for Digital Connectivity Regulations, 2024 (7 of 2024)

Preamble:

At the outset, we thank the Telecom Regulatory Authority of India (TRAI) for providing us with the opportunity to share our comments and inputs on the proposed rating framework for digital connectivity in buildings and areas, as set out in the Draft Amendment Regulations.

Tata Communications Limited, as a global digital ecosystem enabler, caters primarily to enterprise customers by addressing their end-to-end digital connectivity requirements. As submitted earlier in our responses to TRAI's previous consultations on this subject, we reiterate that the proposed rating framework is currently more directly relevant to Telecom Service Providers (TSPs) offering retail mobile services and Infrastructure Providers Category-I (IP-I) entities engaged in provisioning telecom infrastructure such as dark fibre, towers, and related assets.

However, viewed in the broader context of the rapidly evolving telecommunications landscape—including the rollout of next-generation technologies such as 5G and 6G, enterprise broadband, machine-to-machine (M2M) and IoT services, private networks, and cloud-driven digital services—the proposed regulatory framework has the potential to play a meaningful role in strengthening digital connectivity infrastructure across the country. In this respect, the framework would support long-term industry growth and create a win-win outcome for all stakeholders, including enterprises, service providers, property managers, and infrastructure owners.

TRAI's rating regulations have laid down a comprehensive and structured approach for assessing digital connectivity readiness of buildings, with a focus on transparency, stakeholder awareness, and continuous improvement by property managers. While acknowledging the robustness of the proposed framework, we believe that the concept of rating buildings and areas for digital connectivity is still at a nascent stage. In this backdrop, the proposed amendments are a welcome and timely step and are expected to further strengthen and refine the overall digital connectivity rating ecosystem as it matures.

With the above submissions, please find below Tata Communications inputs to this paper in the specified template:



S.No.	Regulation No./ Rating Manual reference/ Subject	Comments/ Suggested modified wordings	Justification for Comments/ Suggestions
1.	General Comment	Adoption of a Common Minimum Program by property managers to ensure fair, transparent, and technology-neutral access to digital connectivity infrastructure for all licensed TSPs, aligning TRAI's Digital Connectivity Rating framework, non-discriminatory access principles, and global best practices	<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 adopt the common minimum program to provide uniform access conditions, timelines, and commercial terms to all authorised TSPs, without exclusivity or preferential arrangements.</p> <p>Suggested Points under the Common Minimum Programme (CMP) for Property Managers to ensure consistency, transparency, and effective implementation of the Digital Connectivity Rating regime:</p> <ol style="list-style-type: none"> 1. Provide equal and non-exclusive access to in-building digital connectivity infrastructure for all licensed Telecom Service Providers (TSPs). 2. Ensure that in-building infrastructure (ducts, risers, cable trays, spaces) is technology-agnostic, capable of supporting multiple technologies (fiber, mobile, Wi-Fi, IoT). 3. Publish and maintain clear, documented procedures for access requests by TSPs, including: <ol style="list-style-type: none"> a. Application format b. Required documentation c. Approval timelines d. Points of contact 4. Standardised processes for access requests, escalation and grievance redressal, and disclosure of existing infrastructure with defined and reasonable timelines.



			<ol style="list-style-type: none"> 5. Uniform and transparent commercial terms, if any, for access to in-building infrastructure 6. Clear Earmarking and Infrastructure Disclosure: Maintain clear demarcation and documentation of telecom spaces, ducts, risers, and cabling paths and sharing of updated 7. Adherence of telecom infrastructure to safety norms, structural integrity, and aesthetic guidelines, applied uniformly to all TSPs. 8. Sharing of the complete and updated Ratings information including present validity period of the rating accorded by the rating agency. 9. Periodic review of in-building digital infrastructure readiness in line with evolving technologies and usage demands. <p>We are of the view that 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>
2.	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>For establishing Digital Communication Infrastructure (DCI) in any building infrastructure involves significant capital investment towards building various DCI elements such as, ducting, optical fiber/ethernet cabling, DAS (Distributed antennae systems for cellular as well as Wi-Fi networks, access points, active elements such as radio access networks, power supply and distribution, adequate redundancy to ensure desired availability and quality of services, etc.</p> <p>Thus, 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</p>



			<p>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 envisaged under the proposed regulatory framework.</p> <p>Property managers and building owners may also be encouraged, through the rating mechanism, to provide pre-approved pathways such as ducts, risers, cable trays, designated telecom rooms, and clearly defined ingress points for digital networks for each service provider. Buildings demonstrating such readiness would facilitate faster and more efficient deployment of digital networks, reduced operational friction, and improved service availability.</p>
3.	General Comment	Property Manager should also maintain complete transparency about the readiness of digital infrastructure to all intended users.	<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>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> <p>Further, the complete and updated Ratings information including present validity period of the rating accorded by the rating agency, should be shared transparently.</p>



4	Review of present categorization of certain property types under Category 'A' and Category 'B'.	Certain property types presently included under Category 'B', such as hospitals, hotels, and educational institutions, exhibit usage patterns and in-building digital connectivity requirements comparable to commercial office complexes and shopping malls, which are classified under Category 'A'.	Requirements of certain property types currently included under Category 'A', such as multi-modal logistics parks, are more aligned with properties under Category 'B' While including metro corridors and bus terminals are not explicitly mentioned, they form a critical part of urban transport infrastructure and hence need to be clearly mentioned and classified for clarity of stakeholders.
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