

Views and comments by Upbhokta Sanrakshan Kalyan Samiti Kanpur on Consultation Paper on review of Rating of Properties for digital Connectivity Regulations, 2024 (7 of 2024)Based on the Consultation Paper issued on February 27, 2026

The following are the primary counter-comments, that emerged during the early implementation of the Digital Connectivity Rating framework:

1. Feedback on Star Rating Levels

Stakeholders observed that the existing five-star scale lacks the nuance required to differentiate between properties with varying levels of readiness.

* **Broad Score Ranges:** The current score ranges are too wide (e.g., 15-point gaps between levels), meaning properties with significant differences in performance might receive the same star rating.

* **Lack of Incentive:** Property managers noted that under the current system, making incremental improvements often does not result in a higher star rating unless they cross a large cumulative score threshold.

* **Proposed Solution:** To address this, it is proposed to introduce half-star levels (similar to Bureau of Energy Efficiency levels) to provide a more accurate representation of digital performance.

2. Feedback on Under-Construction Properties

Stakeholders highlighted the need for a mechanism to address properties that are still under construction, which represent a major portion of the real estate market.

* **Design-Stage Assessment:** Feedback suggested that there should be a way to evaluate and provide visibility for planned digital connectivity infrastructure (DCI) before construction is finished.

* **Proposed Solution:** A structured assessment mechanism has been proposed to issue an indicative certificate based on approved building plans.

3. Feedback on Categorization of Properties

Stakeholders provided input regarding the classification of specific property types, suggesting that some were not logically grouped.

* **Realignment Needs:** Observations led to a proposal to move certain types like Hospitals, Hotels, and Educational Institutions from Category 'B' to Category 'A' (Commercial Establishments).

* Transport Corridors: Feedback prompted the inclusion of Metro corridors under the transport corridor classification.

4. Feedback on "Optional Digital Connectivity Audit"

Property managers expressed a desire to evaluate their infrastructure privately before committing to a public rating.

* Fear of Public Visibility: Stakeholders noted that because ratings become public once awarded, some managers prefer to identify and fix gaps first.

* Proposed Solution: The introduction of an Optional Digital Connectivity Audit allows property managers to engage a registered agency for an internal review without it affecting or appearing as an official public rating.

5. Stakeholder Communication Template

For formal submission of further comments, TRAI provided a specific template (Annexure-I) requiring:

* Reference: The specific regulation number or rating manual section.

* Comments: Detailed feedback or suggested modified wording.

* Justification: A clear rationale for the proposed changes.