

**Bharti Airtel
Limited**

India & South Asia
Airtel Center, Plot No. 16,
Udyog Vihar, Phase-IV,
Gurugram - 122015
Haryana, India

www.airtel.in
Call + 91 124 4222222
Fax + 91 124 4243 252



TRAI/FY23-24/62
Dated: 05.01.2024

To,
Shri Tejpal Singh,
Advisor (QoS-I)
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
JawaharLal Nehru Marg,
New Delhi – 110 002.

Subject: Response to Consultation Paper on “Regulation on Rating Framework for Digital Connectivity in Buildings or Areas)”

Dear Sir,

This is in reference to TRAI’s Consultation Paper on “Regulation on Rating Framework for Digital Connectivity in Buildings or Areas” dated 27.09.2023

In this regard, please find enclosed our response for your kind consideration.

Thanking You,

Yours’ Sincerely,
For **Bharti Airtel Limited**

A handwritten signature in black ink, appearing to read 'Rahul Vatts', is placed over a light blue rectangular background.

Rahul Vatts
Chief Regulatory Officer

Encl: a.a

Response to TRAI Consultation Paper on “Regulation on Rating Framework for Digital Connectivity in Buildings or Areas”

Airtel would like to begin with thanking the Authority for providing it with the opportunity to express its views on the ‘Regulation on Rating Framework for Digital Connectivity in Buildings or Areas’.

To enhance connectivity in buildings and other areas and facilitate the roll-out of the network services of Telecom Service Providers (TSPs), it is important to have high-quality Digital Connectivity Infrastructure (DCI) easily available. In effect, the proposed framework must make it easier for TSPs to have non-discriminatory and non-exclusive access to buildings/areas (residential/commercial/public, etc). It is also important that the framework is aligned with the provisions of the new Telecommunications Act 2023 inter-alia related to the Right of Way (RoW) provisions.

Before providing any inputs on the proposed draft regulation and questions raised under the extant consultation, however, it is important to note that the Authority’s original recommendations¹ on the “Recommendations on Rating of Buildings or Areas for Digital Connectivity” are still under consideration of the Government, and no final decision has been taken on them yet. Therefore, in Airtel’s view, it is premature to provide comments on a draft regulation / framework for rating of the DCI.

It is also important to reiterate that Airtel does not subscribe to the proposition that there is a need to create a new and separate DCIP authorisation under the UL. It is Airtel’s contention that the present licensing framework has worked well and effectively in terms of all the relevant elements of passive infrastructure and should therefore be persisted with.

In addition, considering the vastness of scope of the DCI with its inter-sectoral interactions (i.e., the wider real-estate sector)/classifications of buildings and areas, there should be extensive and thorough deliberations on a workable rating framework that ensures non-discriminatory and non-exclusive access to the DCI.

Airtel notes that while the extant consultation paper is titled as “Rating Framework for Digital Connectivity in Building or Areas”, the draft regulation (and earlier recommendations too) is titled “Rating of Buildings or Areas for Digital Connectivity”. It is Airtel’s submission that the regulation is and should be about rating of “infrastructure” in buildings and areas, for the purpose of digital connectivity i.e. DCI. Therefore, when looked in totality, it is important to ensure that the scope of this consultation paper, as well as the regulation is kept limited to the Property Manager (PM) and the Digital Connectivity Rating Agency (DCRA) since it will be a property manager who will be the owner/manager of the DCI with the responsibility to provide access to the DCI in a non-discriminatory and non-exclusive manner and the DCRA who will rate the DCI (i.e., property) proposed to be rated by the PM.

Therefore, DCRA and PM should be the only two entities to which these regulations should apply.

Airtel has also noted that under Section V of these draft regulations, TRAI has proposed a general obligation of service providers. It is submitted that service providers are governed under the Telecommunications Act.

Therefore, not only should the general obligation of service providers proposed under section V of the draft regulation be removed, but also the licensed TSPs should be altogether excluded from the purview of this proposed regulation. **Further, the TSP’s Quality of Service and user experience of telecom service should not be a part of the DCI Rating framework at all**, even though it has been made a part of the discussion under this consultation paper and draft regulation.

Airtel further submits that the Authority should rely on approach of self-regulation and guidance-based framework in line with government’s vision of minimum government maximum governance and ease of doing

¹ TRAI Recommendations dated 20th February 2023

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business. However, the draft regulation seems to be quite prescriptive. Therefore, it should be made consistent with government’s stated vision.

In summary, Airtel would like to submit the following:

- *The proposed draft regulation relates to the Rating of Building or Areas for Digital Connectivity; i.e. rating of “infrastructure” in buildings and areas for the purpose of digital connectivity and not about rating of the “connectivity” itself.*
- *Therefore, this regulation should only be applied on DCRA’s and Property Managers. The TSPs being users of DCI cannot be and should not be part of this regulation.*
- *The Rating framework for DCI in Buildings and areas should follow a guidance-based approach and self-regulatory mechanism than being a prescriptive regulation.*
- *The Property Manager should maintain transparency and provide access to TSPs in a non-discriminatory and non-exclusive manner in the building and areas.*
- *The Property Manager should ensure the availability of proper infrastructure and facilities for telecom/digital connectivity in the building. In order to ensure that TSPs requirements are taken into account by Property Managers, the TRAI and MoC/DoT should share requirements of their stakeholders (i.e. TSPs / licensees), with RERA/MoHUD, who in turn shall incorporate those inputs in their respective requirements e.g. in national building code to be followed by Property Managers.*
- *The DCRA’s shall rate the building/areas/property of a Property Manager in adherence to these requirements.*
- *Parameters provided by Airtel in forms of a ‘Connectivity Index’ may be considered as sub-categories under the main criteria of provision of wired connectivity infrastructure.*
- *User feedback should be limited to digital connectivity infrastructure in the buildings or area and should not be linked with Quality of Service or user experience of the TSPs.*
- *Section VII, consequences for failure to comply with regulations or direction or guidelines, should be limited to the DCRA and Property Manager and should not impact the TSP services in the buildings/areas associated with the Property Manager.*
- *The scope of this Consultation Paper should be limited to rating framework for digital connectivity infrastructure in buildings or areas, and TSPs Quality of Service should not be formed as part of this regulation.*

This summary is followed by Airtel’s detailed question-wise response to the questions raised in the consultation paper.

**Response to TRAI Consultation Paper on
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Q.1. Do you agree with the broad classification of Buildings or Areas (also referred as Buildings) from Digital Connectivity perspectives provided in Section-3 of this chapter? If not, what could be other yardsticks to classify Buildings for provisions of near uniform Digital Connectivity Infrastructures in similar types of Buildings. Please justify your answer with suitable examples.

Airtel Response:

The Authority has rightly highlighted that digital connectivity and infrastructure requirements will vary based on certain parameters such as user density, usage pattern, reliability requirements, etc.

While the proposed classification seems fine on the face of it, it is important that an additional category or further sub-classification for areas such as sports arenas, stadiums, convention centres, etc. focusing on high-density connectivity for large crowds is included. In other words, the definition under 2 (d) of the draft regulation should be amended to include these sub-categories as well.

Further, it is desirable that the classification of any building be initiated at the initial stage of the layout/building drawing stage being planned by the property owner / manager. Necessary checks like provision for laying of OFC, provision for laying of electricity and other cables with telecom infrastructure, etc. should also be covered to ensure that the telecom connectivity can be made available as and when required.

Further, the DCI under any building type/area should be available in a non-discriminatory and non-exclusive manner.

Q.2 How the Infrastructure Providers (IPs) and Digital Communication Infrastructure Providers (DCIPs) can play an instrumental role in the effective development and deployment of DCI in Buildings or Area? Please provide your answers supporting the best practices followed internationally or national level in this regard.

Airtel Response:

At the outset Airtel would like to state that it does not believe there is any need to create a new and separate DCIP authorisation. The present licensing framework has been working extremely well and effectively in terms of all the relevant elements of infrastructure available with IP-1s and in sufficient detail for them to play their parts in creating and managing the passive infrastructure.

To that extent, for the limited purpose of DCI, the requirement is to make available to the TSPs — timely access, RoW permissions and the necessary in building DCI enabled infrastructure, e.g., ducts with proper wiring, power support, etc. It is therefore the responsibility of the property managers to ensure timely, non-exclusive, and non-discriminatory access/permissions within the premises for the DCI.

In order to ensure that TSPs requirements are taken into account by Property Managers, the TRAI and MoC/DoT should share requirements of their stakeholders (i.e. TSPs / licensees), with RERA/MoHUD, who in turn shall incorporate those inputs in their respective requirements e.g. in national building code to be followed by Property Managers.

The DCRA shall be rating the building/areas/property of a Property Manager in adherence to these requirements. This will ensure that DCI created is aligned with the digital connectivity needs of TSPs.

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Q.3. What should be the key eligibility conditions including experience requirements for the Digital Connectivity Rating Agency (DCRA) proposed under the rating framework? Should there be any performance security for an agency to be DCRA and what should be criteria to evaluate their performances? Please also indicate broad scope of work covering additional aspects of Rating of Buildings for Digital Connectivity, if any, including area of operations [Nation-wide, State(s)/Union Territories (UTs) or Combination of States/UTs] of a DCRA.

Airtel Response:

The evaluation and rating of digital connectivity for buildings, i.e., DCI is an interdisciplinary subject and requires expertise and a deep understanding of telecom networks (wireless and wireline). In addition, it is imperative that those evaluating have considerable expertise in construction/architecture.

The eligibility requirements proposed by the TRAI seems to be fine, however Airtel would like to submit the following:

- 1) It is more relevant here is whether the evaluator (DCRA) in question has professional knowledge in the telecom domain and sufficient skills and experience to assess whether the infrastructure (i.e., DCI) has the capability to accommodate and deliver telecom services by using digital connectivity.
- 2) The eligibility criteria should be designed in such a way that it allows participation/registration of skilled (e.g., certified) individual professionals, LLPs and companies.
- 3) To evaluate the performance of DCRA, the Authority may conduct a periodic peer review and publish it on its website.
- 4) The scope of work should be the rating of a building in terms of digital connectivity, i.e., the digital connectivity infrastructure made available by the property manager, irrespective of the location of the property.

Q.4. With reference to the rating criteria proposed in table at Section 6.2, kindly provide list of possible sub-criteria and corresponding sub-weightage against each criterion with justification? Please also indicate any other aspect which need to be included or modified in the proposed weightage criteria. Please provide your answer with suitable justifications.

Airtel Response:

The criteria for rating a building for digital connectivity and its weightage is a critical aspect of building a transparent and trustworthy rating framework. It may vary depending upon the different categories of buildings.

While the proposed list of criteria seems fine, more weightages should perhaps be given to the provision/availability of wired connectivity infrastructure, provision of wireless connectivity infrastructure and availability of service providers, as these are the main requirements for ensuring good digital connectivity infrastructure in a building or Area.

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Please find below the comments against the proposed criteria and weightage.

Criteria No.	Main Criteria	Weightage	Sub-Criteria Name: Sub-weightage	Airtel’s Comments
1	Compliance to Model Building Bye Laws (MBBL) for digital connectivity	20		We agree with this, however, weightage should be kept as 10.
2	Provision in civil infrastructure, over and above MBBL requirements, for ensuring robust digital connectivity	10	Preventive measures for safeguarding the digital communication infrastructures and the occupants/users of the building or area against intrusions and floods	We agree with these criteria and proposed weightage
3	Provision in power infrastructure, over and above MBBL requirements, for ensuring reliable digital connectivity	10	(i) Alternate power source (ii) UPS power availability (iii) Power backup availability (iv) Power backup (in Hrs.)	This is fine. We further propose that an additional 5-point weightage may be given if the power is through renewable sources / open access.
4	Digital Connectivity Infrastructure Resilience	10	(i) Alternate entry paths (ii) Non-flooding measures for telecom equipment room (iii) Alternate power path	We agree with this
5	Future Readiness of Digital Connectivity Infrastructure	10	Whether Digital Connectivity Infrastructure can accommodate future wireless and wireline technologies	We agree with this
6	Provision of Wired Connectivity infrastructure	10	(i) Fiber connectivity (ii) Ethernet connectivity	We agree with this criterion, however weightage should be increased to 20
7	Provision of Wireless Connectivity infrastructure	10	(i) Mobile network (ii) Wi-Fi network	We agree with this
8	Availability of Service Providers	10	(i) No. of ISPs having integration with Digital Connectivity Infrastructure (ii) No. of TSPs having integration with digital connectivity infrastructure	We agree with this criterion
9	User Experience	10	(i) Subjective assessment i.e., user feedback	This criterion is not relevant for the purpose of rating of DCI. It is very

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		(ii) Objective assessment i.e., network coverage, average latency and average data rates for wireline and wireless network	subjective. The TSPs’ network/ services should not be under this regulation. Hence it should be dropped.
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Further, to highlight and reiterate the point made in Airtel’s earlier submission to the consultation paper on Rating of Buildings or Areas for Digital Connectivity dated 25th March 2022. The parameters stated under the ‘Connectivity Index’ may be considered as sub-categories under the main criteria of provision of wired connectivity infrastructure, Provision of Wireless connectivity infrastructure and Availability of Service providers, for the purpose of rating a building or premise. An appropriate weightage may be provided for these as well.

Parameters	Available	Provision
Connectivity		
Fiber to Premise		
Fiber to Towers		
Fiber to Home		
Fiber to Rooms		
Wireline Ethernet within rooms		
DTH satellite for premise		
DTH for each home / Apartment		
DTH cabling for each home / Apartment		
IT / Telecom room or facility		
Provision for macro sites		
Provision for site on street furniture		
WiFi within premise		
Provision for video cameras within premise		
Power backup for DCI infra		
Digital map of the premise		
Digital map of each house / apartment		
Neutrality towards TSPs		
- Fiber to premise		
- Macro site		
- Small cells on street infra		
- Fiber to home		
Open Wifi within the campus		
Ownership of maintenance of DCI		

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Mandating the above parameters of the connectivity index as sub-criteria for rating would force Property Managers to put in the extra effort to make their property ready for telecom infra and take away any bias towards a particular service provider.

It is also important that this rating criteria be related to provisions/availability of digital connectivity infrastructure in buildings/area, and parameters such as user experience, quality of experience, quality of service or networks parameters such as latency, etc. should not be included in the rating criteria / regulation.

Q.5. What should be the template and minimum score for award of ratings i.e., star-based ratings or any other template like Platinum, Gold, Silver, and Bronze? Please justify your suggestions.

Airtel Response:

The score range and star-based ratings as suggested under Regulation 26 of Section VI of the draft regulation are broadly acceptable. Generally, star-based ratings are easily comprehended by the public as well since they are also used for consumer goods, e.g., air-conditioners, fridges, etc.

Q.6. The proposed workflow and process of Rating of Buildings for digital connectivity is given in Section-8 of this Chapter. Kindly provide your comments or suggestion for improvement of the proposed workflow and process of rating with justification, if any.

Airtel Response:

The proposed flow of Rating process of Building and areas for digital connectivity under section 4.10 (Refer Figure-5 “Overview of Rating Process”, at page-52) of this Consultation Paper seems to be fine.

Q.7. Do you agree with the eligibility conditions for registration of DCRA, proposed in regulation 4? If no, what additional eligibility conditions for registration of DCRA may be incorporated, considering the present rating ecosystem in other domains in the country, with suitable justifications?

Airtel Response:

Airtel submits that with respect to proposed eligibility criteria, specialised knowledge of the telecom domain (including wireless and wireline) and sufficient skills and experience to assess whether the infrastructure (i.e., DCI) has the capability to accommodate and deliver telecom services by using digital connectivity; is required.

Further, the criteria should be such that it allows participation/registration of skilled individual professionals, LLPs and companies (under the Companies Act 2013).

Q.8. Do you agree with the process of registrations of DCRA proposed under regulation 7? If not, kindly suggest proposed changes with justifications.

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Airtel Response:

The business of rating is a professional service. Therefore, the broader framework should not be prescriptive. Rather, it should be light touch. For example, under the 7 (iii) of draft regulation as it stands, in the case of management change, the DCRA has to take the prior approval of the Authority. Such a requirement is prescriptive. Instead, it would be better if it were a simple intimation to the Authority.

Q.9. Please suggest code of conduct for DCRAs proposed to be included under regulation 8 including the criteria for fees to be charged by DCRAs from Property Managers for different types of Buildings.

Airtel Response:

Airtel suggests the following Code of Conduct for DCRAs, which should also be available on the website:

- 1) Provide unbiased and objective assessments of digital connectivity infrastructure in buildings, without influence from external entities.
- 2) Transparently communicate the criteria and methodologies used for evaluating digital connectivity infrastructure. This is should also be made available on the DCRA’s website.
- 3) Disclose any potential conflicts of interest or affiliations that could impact the perception of impartiality.
- 4) Strive for accuracy and reliability in all ratings and assessments.
- 5) Regularly review and update methodologies to ensure relevance and precision.
- 6) Safeguard the privacy and security of data collected during the rating process. Comply with relevant data protection laws and industry standards.
- 7) Handle all non-public information with confidentiality and discretion.
- 8) Only disclose information in accordance with legal and regulatory requirements.
- 9) Operate and perform due diligence in full compliance with all relevant laws, regulations and industry standards.
- 10) Stay informed about changes in legal and regulatory frameworks that may impact the agency's operations and rating.
- 11) Seek feedback from property managers to enhance the credibility of the agency's ratings.
- 12) Engage with stakeholders, including the public, in a transparent and inclusive manner.

Q.10. Do you agree with the general obligations of DCRA provided in Section III of the draft regulations? If not, please provide suggested changes with justifications.

Airtel Response:

The proposed obligations of DCRA under Section III seem very prescriptive in nature. Since the concept of DCI is an emerging area, the approach should be light in touch and include only the Code of Conduct, Disclosure of fees, Evaluation & Award of Ratings, Retention of Records.

Further, instead of audits, the DCRAs’ should be peer-reviewed.

Consumer feedback and consumer complaints should only be limited to DCI (infrastructure) made available by the Property Manager.

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Q.11. What should be the terms & conditions for the Property Managers to ensure use of ratings awarded to their buildings, in legalised manner?

Airtel Response:

The awarded rating should be uniquely numbered for the DCI of a unique property and be used only against such rated DCI property, along-with the validity of the rating provided by the DCRA. This should be transparently available to the public.

Additionally, in order to avoid any misuse or use of rating in an unauthorised manner, the rating assigned to buildings should be published on the DCRA, TRAI and RERA website.

Q.12. Please suggest changes, if any, in the general obligations of Property Managers, provided under Section IV of draft regulations, with justifications.

Airtel Response:

The proposed general obligations of the Property Managers as listed under section IV of the draft regulation seem fine at the moment.

Q.13. Draft regulation 25 provides broad rating criteria and distribution of weightage out of total rating score at a scale of 100. Please suggest new criteria or changes in proposed criteria if any, and relevant sub-criteria for each criterion and their sub-weightage against respective main criteria with suitable justifications in context of rating of buildings for digital connectivity.

Airtel Response:

The criteria for rating buildings for digital connectivity and their weightage is a critical aspect of building a transparent and trustworthy rating framework. Having said that, it may vary depending upon the different categories of buildings.

More weightages should perhaps be given to the provision/availability of wired connectivity infrastructure, provision of wireless connectivity infrastructure and availability of service providers, as these are the main requirements when it comes to ensuring a good digital connectivity infrastructure in a building or area.

On regulation 25, the following are Airtel’s comments against the proposed criteria and weightage.

Criteria No.	Main Criteria	Weightage	Sub-Criteria Name: Sub-weightage	Airtel’s Comments
1	Compliance to Model Building Bye Laws (MBBL) for digital connectivity	20		We agree with this, however, weightage should be kept as 10.

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2	Provision in civil infrastructure, over and above MBBL requirements, for ensuring robust digital connectivity	10	Preventive measures for safeguarding the digital communication infrastructures and the occupants/users of the building or area against intrusions and floods	We agree with these criteria and proposed weightages
3	Provision in power infrastructure, over and above MBBL requirements, for ensuring reliable digital connectivity	10	(v) Alternate power source (vi) UPS power availability (vii) Power backup availability (viii) Power backup (in Hrs.)	This is fine. We further propose that an additional 5-point weightage may be given if the power is through renewable sources / open access.
4	Digital Connectivity Infrastructure Resilience	10	(iv) Alternate entry paths (v) Non-flooding measures for telecom equipment room (vi) Alternate power path	We agree with this
5	Future Readiness of Digital Connectivity Infrastructure	10	Whether Digital Connectivity Infrastructure can accommodate future wireless and wireline technologies	We agree with this
6	Provision of Wired Connectivity infrastructure	10	(iii) Fiber connectivity (iv) Ethernet connectivity	We agree with this criterion, however weightage should be increased to 20
7	Provision of Wireless Connectivity infrastructure	10	(iii) Mobile network (iv) Wi-Fi network	We agree with this
8	Availability of Service Providers	10	(iii) No. of ISPs having integration with Digital Connectivity Infrastructure (iv) No. of TSPs having integration with digital connectivity infrastructure	We agree with this criterion. However building should have provision for at least three wireless service providers in the building.
9	User Experience	10	(iii) Subjective assessment i.e., user feedback (iv) Objective assessment i.e., network coverage, average latency and average data rates for wireline and wireless network	This criterion is not relevant for the purpose of rating of DCI. It is very subjective. The TSPs’ network/ services should not be under this regulation. Hence it should be dropped.

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Further, to reiterate Airtel’s earlier submission to the consultation paper on the Rating of Buildings or Areas for Digital Connectivity dated 25th March 2022, the parameters stated under the ‘Connectivity Index’ may be considered sub-categories under the main criteria of provision of wired connectivity infrastructure, Provision of Wireless connectivity infrastructure and Availability of Service providers, for the purposes of rating a building or premise. An appropriate weightage may be provided for these as well.

Parameters	Available	Provision
Connectivity		
Fiber to Premise		
Fiber to Towers		
Fiber to Home		
Fiber to Rooms		
Wireline Ethernet within rooms		
DTH satellite for premise		
DTH for each home / Apartment		
DTH cabling for each home / Apartment		
IT / Telecom room or facility		
Provision for macro sites		
Provision for site on street furniture		
WiFi within premise		
Provision for video cameras within premise		
Power backup for DCI infra		
Digital map of the premise		
Digital map of each house / apartment		
Neutrality towards TSPs		
- Fiber to premise		
- Macro site		
- Small cells on street infra		
- Fiber to home		
Open Wifi within the campus		
Ownership of maintenance of DCI		

Mandating the above parameters of the connectivity index as sub-criteria for rating would force the Property Managers to put in a greater effort in terms of getting their property ready for telecom infra and take away any bias towards any service provider.

This rating criteria should be related to provisions/availability of digital connectivity infrastructure in buildings/area, and parameters such as user experience, quality of experience, quality of service or networks parameters such as latency, etc. should not be included in the rating criteria / regulation.

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Q.14 The score threshold for ratings is provided in draft regulation 26. Do you agree with the proposed thresholds? If no, please suggest changes with justification and global references, if any.

Airtel Response:

The score range and star-based ratings as suggested under Regulation 26 of Section VI of the draft regulation are broadly okay. Generally, star-based ratings are easily comprehended by the public as well since they are also used for consumer goods, e.g., air-conditioners, fridges, etc.

At this stage, however, the methodology to arrive at the proposed score threshold is not explained in this consultation paper.
