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To

Advisor (QoS-I)
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg, New Delhi-110002

No: BSNLCO-RGLN/25/3/2022-REGLN/
2023

Dated: 20-12-

(Kind attention: Sh. Tejpal Singh)

Sub: Comments of BSNL on Consultation Paper on "Regulation on Rating Framework for Digital Connectivity in Buildings or Areas".

Please find below para wise comments of BSNL on Consultation Paper on "Regulation on Rating Framework for Digital Connectivity in Buildings or Areas".

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.

BSNL Comment: - Yes, Broadly agree.

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.

BSNL Comment:- Like Electricity Act for provision of Electrical Infra in a Building and duly verified by a Govt. certified Person/Agency, in a similar way a Digital Infra Act need to be developed which will provide complete information for provision of Digital Infra for Different rating of buildings and duly verified by a DCRA.

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.

BSNL Comment:- The eligibility criteria of DCRA may stipulate the minimum staffing requirement i.e. Electrical Engineer, Civil and structure engineer to have core competence in respect of national building code, electricity Act and fire safety works and other relevant act and Eligibility criteria already give in regulation 4 need to be augmented. Since it do not involve any material by DCRA therefore no need for any security. Performance shall be evaluated after each three years.

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.

BSNL Comment: - Renewable power sources, like Solar and Wind may be added for total weight age of 10 or may be made mandatory for minimum 20% of total power usage in the building, however sub-classification required in respect of intensity/ importance of activities to be carried out in building and classification as done for TIA certification may be done.

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.

BSNL Comment: - Rating already mentioned in consultation paper seems ok.

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 BSNL Comment for improvement of the proposed workflow and process of rating with justification, if any.

BSNL Comment:- Work flow as already defined in consultation paper seems ok.

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?

BSNL Comment:- In Clause 4d, adequate professional and other relevant experience may be replaced with adequate professional i.e. minimum 02 Nos. having a Graduate Qualification in Electronics/IT/CS and having an experience of not less than 10 year in the relevant field.

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

BSNL Comment:- Yes, in addition, the DCRA must have adequate tools and plants for verification for Digital Rating of Buildings.

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.

BSNL Comment:-The agency shall not have a criminal record. The agency shall not be barred or blacklisted by any Central / State /PSUs. The criteria for fees to be charged by DCRAs from Property Manager should be based on the type of Building and total connectivity i.e. area to be audited.

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.

BSNL Comment:- Seems OK

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

BSNL Comment: - Amendment in Building laws needs to be done, so that occupancy certificate are issued only after getting DCI certificate from DCRA with a unique ID that can be checked online through some defined portal.

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

BSNL Comment:- Seems OK

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.

BSNL Comment:- Proposed rating seems to be ok, however, in Section VI /25/3 - Renewable power sources , like Solar and Wind may be added for total weightage of 10 or may be made mandatory for minimum 20% of total power usage in the building.

Necessary provision for E-waste storage and waste disposal policy need to be included in context of DCRA rating.

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.

BSNL Comment:- Seems ok.



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