

Date of Submission: 10th June 2025

To,

Telecom Regulatory Authority of India (TRAI)
New Delhi
India.

Subject : Response to TRAI's draft manual on rating of properties under "Rating of Properties for Digital Connectivity Regulations, 2024" for comments of stakeholders dated 13th May 25.

Response Submitted on behalf of APREA Members by :

Sameeksha Sharma
Country Principal – APREA India Chapter
Asia Pacific Real Assets Association
Email : Sameeksha.Sharma@aprea.asia
Handphone : + 91 98202 70706

Suggested Comments/ Feedback to Draft DCRA Manual

| S No | Chapter of the Draft Manual | Suggested Modified Wordings | Justification for Proposed Change |
|------|---|---|---|
| 1. | <i>Chapter 2, Role of Stakeholders</i> | <p>Broaden the stakeholder ecosystem for Digital Connectivity Readiness Assessment (DCRA) framework to encompass IP-1 entities also.</p> <p>Additionally, establish a standardized audit mechanisms to evaluate and ensure the compliance of telecom infrastructure developed under the provisions of IP-1 registration.</p> | <p>The formal recognition of IP-1 registered entities, as Digital Connectivity Infrastructure Providers (DCIPs) should entail the conferment of statutory Right of Way (RoW) privileges, institutionalize coordinated engagement with municipal authorities, and guarantee non-discriminatory access to public infrastructure assets indispensable for the widespread deployment of digital connectivity networks.</p> |
| 2. | <i>Chapter 2, Section 2.2 – Role of Property Manager (PM)</i> | <p>(i) Replace “the Property Manager means the person” with “the Property Manager means the person or entity”</p> <p>(ii) Deletion of “and maintain compliance with regulatory standards”</p> <p>(iii) Deletion of 2.2 subsection (ii) – “ii. Documentation and compliance” and include the same in the Role of DCIP (broadened to include IP-1 entities)</p> <p>(iv) Deletion of 2.2 subsection (iii) – “iii. Maintenance of digital connectivity”</p> | <p>Property Manager may not own the DCI and may only facilitate in implementing a Digital Connectivity Infrastructure within a building, owing to the various regulations associated with deployment of a Digital Connectivity Infrastructure.</p> <p>Moreover, a Property Manager is essentially a person (Developer) and / or a Property Management firm which looks into account the various aspects of Building infrastructure including Civil, Electrical, HVAC, Firefighting, Plumbing, Lifts, Security Management etc., but may not possess the capabilities of complex telecom infrastructure architecture.</p> <p>DoT, vide its communication reference <i>F. No. 20-1341/2023 AS-1 dated 19.03.2025</i> on the subject “Back reference on TRAI recommendations dated 20.02.2023 on the 'Rating of Buildings or Areas for Digital Connectivity', has clearly articulated</p> |

| S No | Chapter of the Draft Manual | Suggested Modified Wordings | Justification for Proposed Change |
|------|--|---|--|
| | | <p>infrastructure” and include the same in the Role of DCIP (broadened to include IP-1 entities)</p> <p>(v) Include a Section in Collaboration with DCRA (broadened to include IP-1 entities)</p> | <p>that “Further, equipment like CPEs may be installed on user side based on the demand. However, provisioning of ‘IBS for Indoor Mobile Coverage’ and ‘Telecommunication Equipment (TE)’ may not be mandated as builder/ developer/ Property Manager are not authorized to install ‘IBS for Indoor Mobile Coverage’ and ‘Telecommunication Equipment (TE)’ as per extant licensing and regulatory frameworks. ‘IBS for Indoor Mobile Coverage’ can be installed, maintained and operated by DCIP (proposed) and licensed TSPs while Telecommunication Equipment (TE)’ can be installed, maintained and operated by licensed TSPs only.”</p> |
| 3. | Chapter 2, Section 2.4 - Digital Connectivity Infrastructure Providers (DCIPs) | <p>The policy framework should ensure the formal inclusion of IP-1 registered entities, as well by replacing “<i>Digital Connectivity Infrastructure Providers (DCIPs)</i>” with “<i>Digital Connectivity Infrastructure Providers (DCIPs) including IP-1s</i>”.</p> <p>Inclusion of the word “Own” in the Responsibilities of a DCIP under sub-section (i) Infrastructure Development</p> <p>Addition of responsibilities as covered under 2.2 subsection (ii) – “ii. Documentation and compliance” and include the same in the Role of DCIP (broadened to include IP-1 entities)</p> <p>Addition of responsibilities as covered under 2.2 subsection</p> | <p>IP-1 entities serve as pivotal enablers in the nationwide digital rollout. Their explicit inclusion within the policy and regulatory architecture will not only accelerate the pace of infrastructure deployment but also promote standardization and ensure long pending equitable and rights-based access to telecom ducts and fibre corridors.</p> <p>DoT, vide its communication reference F. No. 20-1341/2023 AS-1 dated 19.03.2025 on the subject “Back reference on TRAI recommendations dated 20.02.2023 on the 'Rating of Buildings or Areas for Digital Connectivity', has clearly articulated that “Further, equipment like CPEs may be installed on user side based on the demand. However, provisioning of ‘IBS for Indoor Mobile Coverage’ and ‘Telecommunication Equipment (TE)’</p> |

| S No | Chapter of the Draft Manual | Suggested Modified Wordings | Justification for Proposed Change |
|------|--|---|--|
| | | (iii) – “iii. Maintenance of digital connectivity infrastructure ” and include the same in the Role of DCIP (broadened to include IP-1 entities) | may not be mandated as builder/ developer/ Property Manager are not authorized to install ‘IBS for Indoor Mobile Coverage’ and ‘Telecommunication Equipment (TE)’ as per extant licensing and regulatory frameworks. ‘IBS for Indoor Mobile Coverage’ can be installed, maintained and operated by DCIP (proposed) and licensed TSPs while Telecommunication Equipment (TE)’ can be installed, maintained and operated by licensed TSPs only.” |
| 4. | <i>Chapter 3, Section 3.3 - General Obligations for DCRA</i> | A provision should be incorporated requiring Digital Connectivity Readiness Assessments (DCRAs) to engage in structured collaboration with IP-1 registered entities and In-Building Solution (IBS) providers / DCIPs throughout the assessment process. | This ensures that the assessment process duly incorporates the distinct operational requirements and strategic contributions of IP-1 entities and In-Building Solution (IBS) providers, thereby fostering a more holistic and representative evaluation of digital infrastructure readiness. |
| 5. | <i>Chapter 4, Section 4.2.2 – Expansion of Mobile and Wireline Connectivity</i> | Mandate the provisioning of In-Building Solutions (IBS) by neutral hosts (DCIP) or IP-1 registered entities within commercial and multi-dwelling premises. | The implementation of shared IBS mitigates the risk of monopolization by individual Telecom Service Providers (TSPs), ensures equitable and enhanced network coverage for all occupants, and aligns with emerging Smart Building standards designed to support next-generation technologies such as 5G and Fibre-to-the-Home (FTTH). |
| 6. | <i>Chapter 4, Section 4.5.1 - Availability of the latest generation of mobile connectivity</i> | The planning and design phases of mobile connectivity infrastructure must incorporate structured consultation with In-Building Solution (IBS) providers (DCIP / IP-1 entities) | IBS providers possess specialized expertise that can significantly influence the design and implementation of mobile connectivity solutions. Their early involvement in the planning process enables the integration of tailored in-building coverage strategies, thereby enhancing signal quality, |

| S No | Chapter of the Draft Manual | Suggested Modified Wordings | Justification for Proposed Change |
|------|--|---|--|
| | | | optimizing network performance, and ensuring seamless user experience across indoor environments. |
| 7. | <i>Chapter 4, Section 4.6.1 - Backhaul fibre connectivity (service provider to property)</i> | The framework should mandate that all backhaul fibre connectivity deployments incorporate dedicated provisions to accommodate the infrastructure requirements of IP-1 and IBS providers (DCIP). | Mandating that backhaul fibre connectivity includes dedicated provisions for IP-1 and IBS providers (DCIP) ensures that both categories of infrastructure players are equipped with the requisite physical and network resources to deliver high-quality digital services. Furthermore, establishing clear performance benchmarks for IBS deployments enables consistent evaluation of service quality, particularly in public and high-density indoor environments, thereby ensuring robust and reliable mobile coverage aligned with next-generation connectivity standards. |
| 8. | <i>Chapter 6, Section 6.4 – Renewal Process</i> | Property managers should be formally empaneled and required to disclose any post-rating exclusivity agreements entered into with TSPs to the DCRA authority. | Such disclosures must be submitted to the DCRA authority for audit and compliance verification, thereby promoting transparency, preventing anti-competitive practices, and safeguarding equitable access to digital infrastructure. |
| 9. | <i>Chapter 7 Section 7.2 – Mechanism for Stakeholder Feedback</i> | The implementation of a grievance submission portal, specifically tailored to IP-1, may be initiated and integrated within the designated section pertaining to feedback mechanisms | IP-1s are routinely impeded by delays in securing property access and executing deployment activities in rolling out TSP neutral digital connectivity infrastructure. The institution of a formal grievance redressal mechanism, routed through the DCRA/TRAI, is imperative to ensure impartial adjudication and robust oversight of regulatory compliance. |

Additional Suggestions :

| S No | Chapter of the Draft Manual | Clause/para/Table/Figure no. of the Draft | Comments/Suggested modified wordings | Justification for Proposed Change |
|------|-----------------------------|---|---|---|
| 1 | 1.0 Overview and Purpose | 1.3 regulation is applicable for | Need to add tenant/occupant (consumer) of the property | In commercial buildings regulation shall be applicable for tenant / occupants (Consumer) as they engage TSP for their requirement |
| 2. | | 1.6 Scope of the rating manual | Include Consumer also as a stakeholder for whom the document shall serve the guidance | This document provides a comprehensive guide for all stakeholders including consumers |
| | | | This manual also shall detail the scope of stakeholders in providing DCI including Consumer scope in the case of commercial buildings | |

| S No | Chapter of the Draft Manual | Clause/para/Table/Figure no. of the Draft | Comments/Suggested modified wordings | Justification for Proposed Change |
|------|-----------------------------|--|---|--|
| 3 | 4.5.1 Table 4.2.6 | 4.5. Future Readiness of Digital Connectivity Infrastructure | Suggest replacing DAS by Neutral Host DAS. | Neutral Host DAS will ensure a single DAS compatible with multiple technologies & service providers resulting in energy efficiency and lower cost to consumers |
| 4 | 4.8. Service Performance | 4.8.4. Sub-Criteria: Secure public Wi-Fi network coverage and performance in nonpublic areas | It is not always feasible to provide a secure public WiFi inside a leased office space | This is upto tenants as this depends on the nature of business where public Wi-Fi might endanger data security compliance. |
| 5 | 3.0 | Registration process for DCRA | TRAI to publish list of the authorized DCRA in their website and to update time to time | This is to ensure authorized DCRA is deployed by any property manager |

| S No | Chapter of the Draft Manual | Clause/para/Table/Figure no. of the Draft | Comments/Suggested modified wordings | Justification for Proposed Change |
|------|-----------------------------|---|--|--|
| 6 | 4.0 | Assessment criteria | TRAI to look at ease of providing WiFi infra in commercial IT parks by service providers. Rating weightage may also be kept at low | When data coming cheaper in mobile, WiFi utility will be very limited in IT Parks by IT employees |
| 7 | 4.4. | Digital Connectivity Infra Resilience | Common In Building Solution (IBS) systems to be accepted by TSPs and they shall not insist on installing their own IBS | Multiple IBS systems installation will have a challenge in any buildings. Hence the common one system would be convenient for plug and play by any TSP |
| 8 | 4.6.2. | Sub criteria: Fiber connectivity till user premises | Property manager scope is to provide common IBS in the building with fiber and the user or consumer to connect the | Fibre till the premises of each office would be impractical in any IT parks |
| | | | network as plug and play with their own choice of TSP | with multi-tenanted buildings. |

| S No | Chapter of the Draft Manual | Clause/para/Table/Figure no. of the Draft | Comments/Suggested modified wordings | Justification for Proposed Change |
|------|-----------------------------|---|--|---|
| | | | Consumer to submit the layouts of fiber terminations of their offices/premises | Consumer scope to be defined very clearly in the assessment part as property manager does not have any access to individual offices |
| 9 | 10.3. | Collaboration with stakeholders | Consumer has choice to choose TSP/ISP and obtaining RoW permission is under consumer scope. Property manager can provide necessary support | Individual offices will have their own secured services selection option |



APREA

APREA (Asia Pacific Real Assets Association) is a leading pan-Asian association made up of investors, investment and asset managers, developers, REITs, InvITs, pension, insurance and sovereign wealth funds, family office platforms, and respected service providers. APREA's focus is cross-border real estate and infrastructure investment, and promotion of real assets as a preferred investment asset class across Asia Pacific and beyond.

APREA, as the regional real assets association across the Asia Pacific region, covers 7 main chapters: Australia, Singapore, China, India, Japan, Hong Kong, and Other Markets.

APREA proudly celebrates its 20th Anniversary in 2025, marking two decades of commitment to advancing the real assets sector. We continue to champion our members by serving as their voice in policy matters, delivering cutting-edge research and insights, and fostering connections that unlock business opportunities. Our focus remains steadfast on creating value and shaping the future of the industry through the following key priorities:

Anchoring Success | Professional Development | Reach out to industry leaders | Education & Research | Advocacy

APREA's members collectively own and manage US\$ 20 trillion of assets. For further information, visit www.aprea.asia

APREA India Chapter Board members

| Neel Raheja (Chair) | President | K Raheja Corporation |
|--------------------------------------|--------------------------------------|-----------------------------|
| Srinivasan S. (Deputy-Chair) | Managing Director | Kotak Investment Advisors |
| Sriram Khattar (Deputy-Chair) | Vice Chairman – Rental Business | DLF Ltd. |
| Harsh Shah | Chief Executive Officer | IndiGrid Trust |
| Hardik Shah | Partner | KKR & Co. Inc |
| Asheesh Mohta | Senior Managing Director RE | Blackstone India |
| Ankur Gupta | Managing Partner, Head of APAC & ME | Brookfield Asset Management |
| Ritwik Bhattacharjee | Chief Executive Officer | Embassy Office Parks REIT |
| Adarsh Ranka | Partner, Tax and Regulatory Services | Ernst & Young India |
| Gautam Mehra | National Leader – Tax and Regulatory | PricewaterhouseCoopers (I) |
| Amit Mathur | Head RE – India | GIC Real Estate |
| Rahul Rai | Head of Real Estate | ICICI Prudential AMC |
| Radha Dhir | CEO & Country Head, India | JLL (I) |
