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Shri Tejpal Singh,

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Sir,

**Sub: TRAI's Draft Manual for Assessment of Digital Connectivity under
Rating of Properties for Digital Connectivity Regulations, 2024**

We are a CAG of TRAI and we wish to submit our counter comments to the comments and the consultation paper on “Draft Manual for Assessment of Digital Connectivity under Rating of Properties for Digital Connectivity Regulations, 2024” for your kind perusal.

Thanking you,

Yours sincerely

Gopal Ratnam V
Secretary
CONSUMER CARE SOCIETY

Counter Comments TRAI's Draft Manual for Assessment of Digital Connectivity under Rating of Properties for Digital Connectivity Regulations, 2024

We appreciate TRAI's endeavour to ensure that its initiative of Rating of Properties for Digital Connectivity is brought to fruition expeditiously. Consumer who intend to purchase or rent properties would be immensely benefit from such a scheme is certain, however, we strongly believe such a rating should be consumer oriented and easy to grasp. More over such a rating should be flexible be to modified for improvement or deterioration of the quality of the Digital Connectivity within the properties, as technology and Usage patterns could drastically change in the future.

The proposed approach in our opinion and experience would not be suitable. We had expressed a couple of the drawbacks during the earlier consultation. We once again wish to reiterate these and other observations based on the draft manual and the comments of other stakeholders.

We have general observations which we list first, followed then by specific counter comments to some of the comments submitted on issues raised in the consultation paper.

A. General Observations on the Proposed Rating

1. Any composite rating has certain inherent disadvantages especially for an ordinary consumer without technical knowledge. The first is that the rating is overall and does not inform the consumer of the various criteria that are components of such a rating. Second, even if the ratings of the various criteria/sub-criteria are disclosed as should be, since it is a consumer right, understanding of the 9 criterias and 26 sub-criterias would be beyond the comprehension and capacity of most common consumers in India, example; 4.5.2 Support for future bands.
2. The rating proposed is based mainly on the infrastructure (Civil, Electrical,Digital etc) expect Criteria 9 which is based on user experience with a weightage of just 5 points. While understanding and appreciating that the other factors do have an impact on user experience, the correlations of these factors to user experience are NOT known and hence actually cannot be evaluated by a consumer even if the ratings on the criteria and sub-criteria are shared with the consumer.
3. With the composite single ratings, a lower rating on one Criteria or a Sub-criteria would be balanced by a higher rating of another Criteria or Sub-Criteria leading to two properties having the same composite single rating but definitely with totally different user experience. As an example, Criteria 5, Future Readiness of Digital Connectivity Infrastructure which has a weightage of 10 points could with excellent ratings camaflouge the current poor user experince with a weightage of only 5 point. Therefore consumer would be misinformed and this would lead to bad decisions by consumers.
4. The Criterias and the Sub-Criterias have been assigned weightage without any rationale being provided for these. We believe there should be technical or scientific basis for this exercise. Why should Criteria 7 that of Availability of Service Providers have a weightage of 15 points, that of 3X times that assigned to User Experience only 5 points.
5. Lastly a few criteria/sub-criteria are not clear in their description and hence some of them could end up defeating the very purpose of having high quality digital connectivity. We point to sub-criteria 4.8.5 Average download speed of different

wireline network(s) in respective highest speed plan. This could lead to practically the property manager refusing to entertaining some Service Providers leading to detrimental impact on consumer choices and user experience.

B. Observations on Counter Comments

1. We find that some stakeholders have made the observation that the implementation of this initiative should be deferred till there is a legal basis. We fully endorse this suggestion as without the necessary legal framework the implementation of this Rating would be tortorous and plainly inimical to consumers. Further consumer would have no resource to misleading representation or deficiency of Services.
2. We also agree with the suggestion made by some stakeholders to have further rounds of discussions invovling other stakeholders who have not responded or not represented like Property Developers.
3. An approach followed by BIS in the development of standards be adopted for this purpose. That is a committee having respresentation from all relevant stakeholders formulate the Rating Framework and then a draft circulated among the public for a wider consultation leading to a final framework. This rating framework would affect millions of consumers across the country long into the future and hence calls for a more careful and diligent approach. Piecemeal modifications at a later date would add to confusion and defeat the very purpose of the initiative.
4. We find that different entities from the same stakeholders group would like to have different weightages in the Criteria/Sub-Criteria, clearly indicating lack of agreement on the assessment of the Digital Connectivity quality. This is a manifestation of the lack of solid foundations for the criteria/sub-criteria.
5. As mentiond in the General Observations on the Proposed Rating we to believe that there is a need to rework the Rating Framework to make Consumer Centric, and hence will not be offering comments on the Criteria/Sub-Criteria that have been listed and their weightage.

In the event TRAI wishes to recommend this Rating with or without any modifications, we suggest that it be first implemented for the other categories of properties rather than Residential, like Government and Commercial, in a phased manner. The learnings from such a step wise implementation process could be incorporated in the Rating Framework and its operations, so that Residential Property Purchasers and Owners are not subjected to negative consequences and loss.

Gopal Ratnam V
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