



VIL/P&O/TRAI/AK/2025/051
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Advisor (QoS-I)
Telecom Regulatory Authority of India,
4th, 5th, 6th & 7th Floor, Tower-F,
World Trade Centre, Nauroji Nagar,
New Delhi - 110 029

Kind Attn: Shri Tejpal Singh

Subject: Comments on the "Draft Manual for assessment of Digital connectivity under Rating of Properties for Digital Connectivity Regulations, 2024" issued on May 13, 2025.

Dear Sir,

This is in reference to the "Draft Manual for assessment of Digital connectivity under Rating of Properties for Digital Connectivity Regulations, 2024" issued on May 13, 2025.

In this regard, kindly find enclosed herewith comments from Vodafone Idea Limited on the abovesaid draft manual at **Annexure A & B**.

We hope our comments will merit your kind consideration please.

Thanking you,
Yours sincerely,

For Vodafone Idea Limited

Ambika Khurana
Chief Regulatory and Corporate Affairs Officer

Enclosed: Annexure A & B



Annexure-A

VIL Comments to the TRAI's "Draft Manual for Assessment of Digital Connectivity under Rating of Properties for Digital Connectivity Regulations,2024" dated 13.05.2025

At the outset, we are thankful to the Authority for giving us this opportunity to provide our comments to the TRAI's Draft Manual for Assessment of Digital Connectivity under Rating of Properties for Digital Connectivity Regulations,2024' issued on 13.05.2025.

In this regard, we would like to submit our comments as follows, for Authority's kind consideration.

1. Onboarding of PMs

- a. As this framework prescribes lot of activities for the property managers, it is imperative that their views are properly reflected and deliberated during any consultation process at TRAI.
- b. Their active participation in the consultation process would help clear understanding of the Rating framework, its objectives and would also ensure its effectiveness and adoption in the market.
- c. Thus, the consultation should involve equal and active participation from the Property Managers also.

2. Value Creation through Rating Framework

- a. We foresee lot of merit and value creation in this Rating framework being envisaged by TRAI and it can resolve some of the inherent challenges faced by consumers with indoor and in-building/in-premises coverage.
- b. The draft Manual read with the Regulation, stipulates the Rating framework to be on voluntary basis at present whereas through the Recommendations to the Government, the Authority has sought mandates through amendment in Building codes, bye-laws as well as by mandating Government building to be the first starters.



- c. The Rating framework envisages to unlock value in providing in-building coverage. With growth in economy and focus on infrastructure, huge number of buildings, premises, malls, metro-stations, airports etc. have come up in last few decades, with ever increasing growth. With such expansions and growth in number of buildings and premises, there comes a problem of digital connectivity inside them, especially in indoors, basements, parking, high-rises etc.
- d. In today's time, the mobile connectivity has become a necessity and consumers expect to be connected at all places. It is well known that if the digital connectivity infrastructure is not built into during the design stage itself, it becomes very cumbersome and comparatively costly to build that infrastructure post construction.
- e. If digital infrastructure is laid out and connectivity is made available, it would give assurance to the consumers while going for purchase or for using the said building/premise. This will help the Property Managers of the said building/premises to build more trust with the consumers and also influence the consumer's choices. The building/premise with better digital connectivity will always be preferred more by the consumers as compared to the ones having lesser connectivity.
- f. The Rating framework will provide an independent rating to the level of digital connectivity available and thus, the consumers will be able to rely on the said information and make suitable choice for the building/premises.
- g. **Thus, the Rating framework 'Creates Value' for the Property Managers instead of 'Value Capture' for property manager or for TSPs.** For the Rating framework to be efficient and for it to properly trigger market forces, the Rating framework has to be mandated for some category of buildings/premises, and at the same time, it has to be continued to be kept voluntary for TSPs/ISPs and there should not be any cost imposed upon TSPs/ISPs for the buildings and premises (be it private or Government). **This will ensure there is clear ownership for the digital connectivity creation as well as clear advantage of monetizing (directly or indirectly) the value created.**
- h. **As the Authority has recommended that the Government buildings should mandatorily come under the Rating framework, it should ensure that there should not be a reverse pressure on TSPs/ISPs to absorb the cost of provisioning the digital connectivity infrastructure or digital connectivity or repair/maintenance etc. It has to be explicitly captured that the cost and ownership for this, would have to be borne by the Property Managers (including Government bodies, wherever applicable) and a suitable commercial agreement should be executed by them, directly and without any intermediary, with the respective TSPs/ISPs.**



3. User-friendliness and flexibility

- a. **Flexible timelines:** As this process envisages Value creation for the Property Managers, which also acts as a trigger for Property Manager being interested in taking Rating. In such cases, there should not be any hard-coded timelines for the Property Managers in the application or evaluation process. Also, as the DCRA will get reimbursed through Property Manager only hence, they both would also be having a negotiated commercial arrangement as well, also involving the timelines of various sub-activities. Thus, their interactions should also be kept flexible and not time-bound or time-barred.
- b. **Standardized Formats:** To ensure fair, transparent and standardized approach for evaluating complete digital connectivity, the process of submission of application by property manager as well as communication of deficiencies/observations should be in standardized formats, to the extent possible.
- c. **Trigger Market forces:** The process of rating application and evaluation should be simple yet robust enough. As the evaluation is to be done by the DCRA based on a commercial relationship between Property Manager and DCRA, there should not be any time limits of submission of additional information or mandatory two phases of due diligence etc. It could be a clear case that the Property Manager takes services of DCRA during designing and/or construction phase itself, and may want to reach Rating Platform straight for Rating evaluation. Therefore, the Rating Platform should also allow the same, without having to go through two stages of Due Diligence.
- d. **Backhaul:** While fibre backhaul is desirable however, in many cases it might not be possible to have fibre availability till the building/premises and/or the microwave/spectrum based backhaul would be sufficient. Therefore, in the early years of roll-out of rating framework, the choice of backhaul should be kept flexible and open to commercial relationship between Property Managers and TSPs/ISPs.

4. Transparency – Publishing observations and Deficiencies

- a. The Ratings given to any building/premise should be made available on digital platform, for consumer's view.
- b. Also, the observations, deficiencies or the weightage where score was lower, should also be made available for consumer's information through the digital platform. E.g. if a property is rated as '3 star' or '4 star', then the general public should be able to view the reasons as what are the deficient areas of that particular property for which it was not rated as a '5 star' property.



- c. The deficient area for one consumer may not be an area of concern for another consumer. For e.g. for some consumers, non-availability of wireline connectivity may not be a major area of concern.

5. Role of TSPs

- a. The obligation of the TSPs should not be changed from the one as given in the Regulation dated 25th October 2024 i.e.

Section VI GENERAL OBLIGATIONS OF SERVICE PROVIDERS

23. No exclusive arrangement with Property Manager for digital connectivity.- (1) No service provider shall enter into an exclusive arrangement or tie-up arrangement with any property manager for development or access of digital connectivity or digital connectivity infrastructure in their property.

- b. Further, the rating process should not become an indirect medium of changing QoS or MRO conditions.

6. Weightage for Mobile coverage v/s Public wifi

- a. The TSPs have deployed next generation technologies (i.e. 4G/5G) in mobile networks giving good data speeds and thus enhanced user experience.
- b. The Indian telecom industry has built a robust and ubiquitous digital mobile network and its infrastructure which connects lakhs of towns, districts and villages including deep rural interiors and hinterlands across the country, over the last decade, especially last 7-8 years. This digital mobile network and infrastructure, entailing massive investments, is the backbone that delivers high quality data services and has also proved its resilience and scale during the Covid-19 times.
- c. With the widespread availability of 4G services in the country and rollout of 5G, there is ubiquitous coverage of 4G and 5G mobile networks as such, public at large now have access to fast and reliable mobile internet.
- d. The mobile data is available with convenient recharge options and at affordable prices, which are one of the cheapest across the world. For last many years, the



industry is also providing x GB/day kind of data plans, which has further made the tariffs more affordable.

- e. India has made massive growth in the global mobile download speed, ranking at 23 globally for mobile internet speeds as of December 2024, as reported in the Speedtest Global Index2.
- f. With ubiquitous coverage, enhanced Data speeds, affordable tariffs, there is marginal utility left for availing data service through public Wi-Fi. Further, if Mobile coverage is adequately ensured by the Property manager then, there is hardly any utility left for the consumers to use public wifi.
- g. Given this, it is surprising to see equal sub-weightage being given to Mobile coverage and Public wifi. We strongly oppose any such comparison or equal weightage.
- h. Giving weightages for public wifi could give a bypass opportunity to the Property managers and they might become willing to have lower scores on mobile connectivity as scores on public wifi could compensate and give them higher rating. In such cases, the consumers would continue to face issues in universal mobile connectivity inside the buildings/premises.
- i. **Therefore, it is strongly recommended that no inefficient use case is pushed under the Rating framework, which can jeopardize the adoption of such a novel policy measure and collaboration of all stakeholders. There should not be any weightage for public wifi. If that is not possible, it should not be more than 2 score, irrespective of public or non-public areas. Suitable adjustments should accordingly be made to the weightages and mobile coverage/infrastructure weightages are accordingly increased.**

In addition to above-mentioned comments, kindly find enclosed provision-wise comments at **Annexure-B**, in the format prescribed in the draft manual.

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Annexure-B

S. N.	Chapter of the Draft Manual	Clause/Para/Table/Figure No. of the Draft Manual	Comments/Suggested modified Wordings	Justification for Proposed Change
1	2	<u>2.1. ii & iii</u> <u>2.2. i. & ii.</u>	There should be standardized formats for submission of application as well as process of evaluation and communication of deficiencies/observations.	To ensure fair, transparent and standardized approach for evaluating complete digital connectivity, the process of submission of application by property manager as well as communication of deficiencies/observations should be in standardized formats, to the extent possible.
2	2	<u>2.2</u>	The Role of Property Manager should clearly include the responsibility and ownership regarding all costs to be borne for ensuring digital connectivity infrastructure and connectivity and for taking Rating.	<p>1. Vide the clause 14 of TRAI's recommendation dated 20.02.2023, TRAI had recommended that <i>"that the Property Manager shall be the owner of the deployed DCI whether created by himself or through his agent and shall be responsible for maintenance, expansion and upgradation of such DCI. The Property Manager shall allow access of DCI to all service providers in fair, non-chargeable, transparent and non-discriminatory manner and shall not have any exclusive arrangements or agreements with any infrastructure/service provider."</i></p> <p>2. Further, if digital infrastructure is laid out and connectivity is made available, it would give assurance to the consumers while going for purchase or for using the said building / premise. This will help the Property Managers of the said building/premises to build more trust with the consumers and also influence the consumer's choices. The building/premise with better digital connectivity will always be preferred more by the consumers as compared to the ones having lesser connectivity.</p>



S. N.	Chapter of the Draft Manual	Clause/Para/Table/Figure No. of the Draft Manual	Comments/Suggested modified Wordings	Justification for Proposed Change
				<p>3. The Rating framework will provide an independent rating to the level of digital connectivity available and thus, the consumers will be able to rely on the said information and make suitable choice for the building/premises.</p> <p>4. Thus, the Rating framework 'Creates Value' for the Property Managers instead of 'Value Capture' for property manager or for TSPs. As such, it should be clearly defined that all the costs have to be borne by the Property manager.</p>
3	2	<u>Clause 2.3</u>	<p>Modified clause:</p> <p><i>No service provider shall enter into an exclusive arrangement or tie-up arrangement with any property manager for development or access of digital connectivity or digital connectivity infrastructure in their property.</i></p>	The TSP's role has to be as per the Regulation No. 23 of the Regulation dated 25 th October 2024.
4	2	<u>Clause 2.4</u>	Both TSPs/ISPs and DCIPs can support Property Manager. Therefore, TSPs/ISPs are also to be included.	Both TSPs/ISPs are empowered through license, for developing and maintenance of digital infrastructure other than DCIP. Hence, TSPs/ISPs can't be excluded.
5	3	<u>Clause 3.2</u>	The registration process of DCRA or any review thereafter, should also involve evaluation of their application by an Empowered Committee, which should also include Technical experts from TSPs.	As the major part of the rating framework would be to set up digital connectivity infrastructure and connectivity, from mobile and wireline broadband point of view, it is important that a collaborative approach is adopted and TSPs are also involved in examining the registration of DCRA's. The technical experts from TSPs can provide rich insights during evaluation process as well as subsequently during any review of the working of any DCRA.



S. N.	Chapter of the Draft Manual	Clause/Para/Table/Figure No. of the Draft Manual	Comments/Suggested modified Wordings	Justification for Proposed Change
6	3	Clause 3.7 iii. & vi.	The Property Manager should be given flexibility to directly opt for Due Diligence Stage II or to opt for Stage I and Stage II together, without going through a linear and sequential process.	<ol style="list-style-type: none"> 1. The Rating framework has to be flexible and user-friendly especially during initial few years. 2. As the evaluation is to be done by the DCRA based on a commercial relationship between Property Manager and DCRA, there should not be any time limits of submission of additional information or mandatory two phases of due diligence etc. 3. It could be a clear case that the Property Manager takes services of DCRA during designing and/or construction phase itself, and may want to reach Rating Platform straight for Rating evaluation. 4. Therefore, the Rating Platform should also allow the same, without having to go through two stages of Due Diligence.
7	4	<u>Table 4.1, Point no. 4.8.2 & 4.8.4</u>	There should not be any weightage for public wifi. If that is not possible, it should not be more than 2 score, irrespective of public or non-public areas. Suitable adjustments should accordingly be made to the weightages and mobile coverage/infrastructure weightages are accordingly increased.	For detailed justification, kindly refer to the point no. 6 of the comments given in the Annexure-A.
8	4	Clause 4.2.2 (i)	<u>Modified clause given below:</u> <i>i. Objective: To assess the availability of civil infrastructure like DCI space, pathways, and provisions to allow for the expansion of both mobile (e.g., 4G/5G/6G) and wireline connectivity (e.g., fiber-optic cables,</i>	



S. N.	Chapter of the Draft Manual	Clause/Para/Table/Figure No. of the Draft Manual	Comments/Suggested modified Wordings	Justification for Proposed Change
			<i>Television, camera etc.) inside the property as technology evolves.</i>	
9	4	Clause 4.5.1(ii),(a), 4.6.2	Backhaul should be kept flexible and both backhaul through fibre or through spectrum, should be permissible.	For justification, kindly refer to the point no. 3.d. of the comments given in the Annexure-A.
10	4	4.8.1 ii. & 4.8.3 ii.	<ol style="list-style-type: none"> 1. It should be clearly mentioned that RF testing, coverage maps, speed tests etc should be arranged by Property Manager directly or through a 3rd Party. 2. Reference to Test Probes should be removed. 	<ol style="list-style-type: none"> 1. RF testing, maps, speed tests etc can be done by 3rd Parties and it should be clearly defined in the manual that the Property Manager has to ensure this, without loading the same on TSP. 2. Test probes are not possible at TSPs end. Instead cell level KPIs can be checked, if needed.
11	4	Clause 4.8.3 (v) S. No. 2.of the Table 4.47	<p>Modified serial no. 2 should be as follows:</p> <p>If at least 3 service providers have more than 60% mobile coverage for their latest generation of technology in non-public areas (including lifts and basements) with average minimum download speed of 10Mbps for 4G or 100 Mbps for 5G technology as applicable.</p>	It is imperative that adequate service providers coverage is made available, to ensure universal connectivity.
12	4	<u>Clause 4.9.1.</u>	The Surveys for feedback of users may be conducted at a later stage.	It is important to keep the process simple and flexible in initial few years, to ensure its successful adoption.
13	4	Table 4.41(2)	In the weightage for "If at least two mobile service providers have integration with DCI in the property or more 75% coverage in indoor areas" the weightage of '5' to be reduced to '3'.	It is imperative that adequate service providers coverage is made available, to ensure universal connectivity.



S. N.	Chapter of the Draft Manual	Clause/Para/Table/Figure No. of the Draft Manual	Comments/Suggested modified Wordings	Justification for Proposed Change
14	5	<u>Table 5.1, 5.6.1, 5.6.2, 5.6.4</u>	There should not be any weightage for public wifi. If that is not possible, it should not be more than 2 score, irrespective of public or non-public areas. Suitable adjustments should accordingly be made to the weightages and mobile coverage/infrastructure weightages are accordingly increased.	For detailed justification, kindly refer to the point no. 6 of the comments given in the Annexure-A.
15	5	Clause 5.3.1(ii)(a)	Backhaul should be kept flexible and both backhaul through fibre or through spectrum, should be permissible.	For justification, kindly refer to the point no. 3.d. of the comments given in the Annexure-A.
16	5	Clause 5.6.3 (v)S.No 2.of Table 5.37	Modified serial no. 2 should be as follows: If at least 3 service providers have more than 60% mobile coverage for their latest generation of technology in non-public areas (including lifts and basements) with average minimum download speed of 10Mbps for 4G or 100 Mbps for 5G technology as applicable.	It is imperative that adequate service providers coverage is made available, to ensure universal connectivity.
17	5	<u>Clause 5.7.</u>	The Surveys for feedback of users may be conducted at a later stage.	It is important to keep the process simple and flexible in initial few years, to ensure its successful adoption.
18	5	Table 5.31(2)	In the weightage for "If at least two mobile service providers have integration with DCI in the property or more 75% coverage in indoor areas" the weightage of '5' to be reduced to '3'.	It is imperative that adequate service providers coverage is made available, to ensure universal connectivity.