UL Solutions inputs on TRAI consultation paper on "Regulation on Rating Framework for Digital Connectivity in Buildings or Areas"

At the outset, we would like to thank the Telecom Regulatory Authority of India ("the authority") for issuing the consultation paper "Regulation on Rating Framework for Digital Connectivity in Buildings or Areas" and for providing us the opportunity to share our input on the same.

We are grateful to the authority for referring to our SPIRE™ Smart Building Program in this consultation paper as well as the recommendations issued on Feb. 20, 2023, on "Rating of Buildings or Areas for Digital Connectivity." The SPIRE rating program is a comprehensive framework that measures the effectiveness and security of smart buildings on six primary criteria, including connectivity, sustainability, cybersecurity, power and energy, life and property safety, and health and well-being.

We sincerely appreciate the dedicated efforts of the authority to propose a draft regulatory framework like that detailed in the "Rating of buildings or areas for digital connectivity regulations 2023" section.

We would like to submit the following inputs/suggestions on the draft regulatory framework:

- **Leverage private third-party players with global expertise –** Private third-party testing, inspection, and certification (TIC) agencies such as UL Solutions have global expertise and experience in the domain of building ratings encompassing various parameters (namely, digital connectivity, cybersecurity, energy efficiency, health, safety, etc.), and a public–private partnership with such agencies can play a significant role in the development and implementation of the desired regulatory framework. Private third-party agencies with relevant expertise can support the authority in the following ways:

  o Bring in global expertise and experience and help develop required standards and technical specifications per global best practices, as well as help customize per Indian requirements wherever needed.

  o Work as a partner for the authority in designing and implementing the building rating program by facilitating desired resources in terms of specialized toolsets along with knowledge and training programs.

  o Support capacity building for all concerned stakeholders (including the authority, property managers, assessors, and others) by sharing required knowledge, including training programs, etc., regularly.

- **Criteria for the Digital Connectivity Rating Agency (DCRA) –** As the DCRA will play a critical role in the assessment of buildings as per the stipulated parameters for awarding ratings, it is of utmost importance that suitable eligibility and accreditation requirements should be defined for the DCRA to ensure that only agencies with relevant expertise, experience and resources perform such critical evaluations.

- **Need for robust surveillance mechanism –** For effective implementation and to engender trust in and the quality of the building rating framework, a robust surveillance mechanism is essential. Private third parties with global expertise can support the authority in facilitating such a mechanism.

- **Ensure safer and more secure telecom products for digital connectivity –** The authority should ensure that the products/network elements to be installed in buildings for digital connectivity undergo testing and certification per globally accepted standards and technical specifications about safety and security parameters.

- **Inclusive engagements for developing policies and processes around building rating programs –** In this highly connected environment that includes property managers, consumers, digital connectivity service providers, rating agencies, etc., any regulatory efforts toward framing specifications and processes should include all relevant stakeholders and take into consideration current building rating programs such as the SPIRE Smart Building Program by UL Solutions, which are being adopted across various global geographies.

We hope the authority will consider our submissions favorably while finalizing the "Rating framework for digital connectivity in buildings or areas" section of the paper and all related policies and procedures.

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