



Response to Consultation Paper on “Regulation on Rating Framework for Digital Connectivity in Buildings or Areas.

At the outset, Tata Teleservices Limited and Tata Teleservices (Maharashtra) Limited [together called “TTL’] express our sincere gratitude to Telecom Regulatory Authority of India (TRAI) for releasing the consultation paper on “Regulation on Rating Framework for Digital Connectivity in Buildings or Areas” and calling for stake holders’ comments. We, TTL would like to submit our response to the issues and concerns as mentioned in the Consultation Paper is as follows:

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.

TTL Response: Broad classification of buildings as Home, office, and neighbourhood (as larger geographical area) is acceptable at high level. Buildings can be airports, ports, railway stations, public transport stations, bus stands, major rail routes and highways, large shopping complexes, industrial estates, major market areas, office or workplaces, government buildings, government residential colonies and any other building of public importance. In such cases it may be required to make rating mandatory. Rating may also be made mandatory for densely populated or high-rise residential buildings.

The necessary provision for laying of OFC/laying of electricity and other cables with telecom infrastructure, etc. should be covered. For ensuring this requisite amendment in the Model Building Bye Laws (MBBL) should be made to ensure that the building owners adhere and make provisions for laying of infrastructure by the TSPs during construction of the building.

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.

TTL Response: A robust Digital Connectivity Infrastructure (DCI) contributes significantly to economic development both by increasing productivity and by providing amenities that enhance the quality of life. In context of DCI development, various countries have aligned their telecom licensing framework to increased utilization of resources (including spectrum), reduction of cost, attract investment and strengthen the service delivery segment by segregating the infrastructure/network layer and service/ application layers. The advantage of such frameworks is



that they simplify the licensing process and provide a more conducive environment for market growth and improvement of the socioeconomic welfare of society while considering the convergence of technologies.

DCI plays a vital and leading role in successful implementation of various Government schemes under Digital India, Make in India, Ayushman Bharat Digital Mission (ABDM), and development of Smart Cities. The recently launched 5G will transform India into a broadband superhighway and improve the country's socio-economic structure. In this light it's also imperative that new players are encouraged through conducive licensing framework for creation of both active and passive infrastructure. This is likely to result in increased common sharable DCI and network resources, reduction in cost, attract investment, strengthen the service delivery segment, and could also prove to be catalyst in proliferation of 5G services for Industry 4.0, enterprise segment and various other use cases.

IP and DCIPs can provide fibre network in the Metros as well as Telecom services to the building, if affordable/nominal cost and permission is given for Fiber rollout. Alternately, if fibre is made available equitably to all Service providers in a cost-effective manner, service provider can build wired network services by deploying appropriate technologies. The inbuilding wiring should be made equally available to all service providers, with a nominal cost to allow the tenants in the building to avail services from any provider of his choice.

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.

TTL Response: Academic credentials in the telecom field and the ability to design customized in-building solutions for digital connectivity may be prerequisites for experts evaluating digital connectivity. Such agencies must be run by professionals with the necessary skill set. It may be necessary to have specific understanding in the wireline and wireless telecom domains for connectivity. The agency should have a proven track record in assessing and evaluating digital infrastructure.

A minimum number of 3 years of experience in the industry or a specific number of successful assessments could be considered.

In terms of performance security, DCRA should provide a performance guarantee to ensure meeting the standards set by the rating framework.

For the evaluation of the performance of the DCRA, following criteria can be followed such as the quality of the assessments, compliance to statutory guidelines etc.



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.

TTL Response: Availability of service provider or equal access to all service provider is an important criteria, to allow choice to the tenants. Hence the weightage for the same may be considered higher above other criteria.

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.

TTL Response: There should be certain points which are mandatory which will make building to be eligible for DCI ratings. These are:

- a. Availability of fiber to the building.
- b. Equal access to fiber to building available to all TSPs and ISPs.
- c. Availability of infrastructure inside the building –copper / fiber wiring from Entry points as well as terrace to extend the connectivity to any floor.
- d. Space for TSPs/ISPs to install their equipment.
- e. Power supply with backup power supply for infra room.

Other points can be given additional points which will augment the rating of the building Protection against natural calamities, Flood etc. Wi-Fi in the building, additional power source, additional fiber entry possibility of poles/Roof top tower for Wireless connectivity.

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

TTL Response: Post the necessary infrastructure is in place and necessary guidelines issued by the concerned authorities, the rating of Buildings should be considered. The following may be considered:

- a. All building plans should have provisions for ducts to cater for 2-3 service providers enabling consumers to choose one of them.
- b. The layout of the building should be approved after necessary checks for the laying of infrastructure for Digital connectivity and the owner of the building should not be allowed to make any changes during the construction.



- c. The Property Manager should ensure that at the construction stage, there should not be any modifications in the provisions for laying the infrastructure for digital connectivity.
- d. On the completion of the building owner can submit the application to the DCRA for rating.

Q.7. Do you agree with the eligibility conditions for registration of DCRA, proposed in regulation? 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?

TTL Response: No comments.

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

TTL Response: Yes, agree with the process of registrations of DCRA proposed under regulation.

Q.9- Please suggest code of conduct for DCRA's proposed to be included under regulation 8 including the criteria for fees to be charged by DCRA's from Property Managers for different types of Buildings.

TTL Response: Every DCRA shall disclose the fee to be charged and other terms and conditions, if any, to the Property Manager and get their acceptance before commencement of rating activities.

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.

TTL Response: The general obligations of DCRA seems to be appropriate for the initial context.

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



TTL Response: Basic level Rating given by DCRA which gives rating after considering the compliance to the Digital Infrastructure Criteria requirements. Regular audit report should be the condition for Property manager to ensure the use of ratings.

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

TTL Response: No comments.

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.

TTL Response: Availability of service provider or equal access to all service provider is an important criteria, to allow choice to the tenants. Hence the weightage for the same may be considered higher above other criteria.

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.

TTL Response: No comment.