



VIL/PB/RCA/2023/028

October 19, 2023

**Advisor (CA & IT)**

**Telecom Regulatory Authority of India,**  
Mahanagar Doorsanchar Bhawan,  
Jawaharlal Nehru Marg (Old Minto Road),  
New Delhi – 110002

**Kind Attn: Shri A. K. Singh**

**Subject:** Comments on the TRAI's draft Regulation on "The Registration of Consumer Organisations (Amendment) Regulations, 2023" issued on September 14, 2023

**Dear Sir,**

This is with reference to the above mentioned draft regulation from TRAI on "The Registration of Consumer Organisations (Amendment) Regulations, 2023" issued on September 14, 2023.

In this regard, kindly find enclosed herewith comments from Vodafone Idea Limited to the said draft regulation.

We hope our comments will merit your kind consideration please.

Thanking you,

Yours sincerely,

For **Vodafone Idea Limited**

**P. Balaji**  
**Chief Regulatory & Corporate Affairs Officer**

**Enclosed:** As stated above



## **VIL Comments to the Draft Regulation on “The Registration of Consumer Organisations (Amendment) Regulations, 2023”**

At the outset, we are thankful to the Authority for giving us opportunity to provide comments to the “Draft Registration of Consumer organisations (Amendment) Regulations, 2023” dated September 14, 2023.

In this regard, kindly find below our comments for Authority’s kind consideration:

1. The above said draft regulation proposes the registration of consumer organizations at national level, in addition to existing State or Union Territory level. We welcome this step from the Authority.
2. In our view, National level organizations would bring varied experience and learnings from different geographies and from different segment of consumers. They are also expected to be better equipped in terms of capability and experience in campaigning and conducting consumer awareness events. Due to access to multiple states/UTs, they can act as an important bridge between voice of mass consumers and TRAI/TSPs and thus, bringing more efficiency and quality in interactions between consumer organization and TRAI/TSPs.
3. Considering its immense benefits, it’s equally important that only entities with verifiable experience are registered and their scope/role should have a wider horizon. Thus, we request the Authority to kindly consider the following points prior to issuance of the final regulation on the subject.
4. **Eligibility Criteria:**
  - a. The draft regulation proposes the eligibility criteria for registration of national level consumer organizations, as below:
    - (b) experience of working in at least five States or Union Territories; and*
    - (c) capability and experience in campaigning and conducting theme-based events and developing awareness material.*
  - b. In our view, the eligibility conditions should also be supported with objective and measurable parameters like experience of working and dealing with telecom consumers, experience in raising consumer voice by participating in consultation papers etc. The above proposed eligibility criteria are quite wide and subjective presently.
  - c. **Therefore, along with above stated eligibility conditions, we request the Authority to additionally prescribe the objective and verifiable parameters, for assessing the**



**experience and capabilities of consumer organizations for registration at national level.**

**5. Scope and Role of national level consumer organizations:**

- a. In the TRAI's guidelines issued vide letter No.323-1/2015-CA dated 04-11-2015, regarding holding of Consumer Education Workshops (CEW) by the Telecom Service Providers, it is mentioned that:

*"An advance notice of at least 15 days must be given to all CAGs registered with TRAI and located in the service area where the workshop is being held – regarding date, time and venue through post/email and their confirmed on phone".*

- b. Further, in the TRAI Regulation on the "Telecom Consumer Complaint Redressal Regulations, 2012", it is mentioned that:

*The Advisory committee shall consist of two members of which one member shall be from the consumer organisations registered with the Authority and the other member shall be a representative of the service provider; Provided that a member from the consumer organisations shall not be appointed as a member in more than such number of Advisory Committees as may be specified by the Authority.*

- c. **It is important to have clarity in the scope/role of national level consumer organizations with respect to above-mentioned regulatory requirements.**

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