



*Draft Regulation on Telecommunication Tariff  
(Seventy Second Amendment) Order, 2025  
'Comments by Tata Teleservices Limited &  
Tata Teleservices (Maharashtra) Limited*

At the outset, Tata Teleservices Limited and Tata Teleservices (Maharashtra) Limited [together called “TTL”] once again express our sincere gratitude to Telecom Regulatory Authority of India (TRAI) for releasing Draft Regulation on Telecommunication Tariff (Seventy Second Amendment) Order, 2025 and calling for stake holders’ comments.

After reviewing the proposed amendments—particularly the substitution of Clause 7(iii) and the insertion of Clause 7(iv) in the principal Tariff Order—our detailed comments are as follows:

#### **1. Amendment of Clause 7 (iii): Increase in Financial Disincentive**

##### **Existing Provision:**

- Rs.5,000 per day of delay in reporting tariff.
- Maximum cap: Rs.2 lakh per instance.

##### **Proposed Amendment:**

- Rs.10,000 per day of delay for the first 7 days.
- Rs.20,000 per day of delay beyond 7 days.
- Maximum cap: Rs.5 lakh per instance.

##### **(a). Increase in Delay Penalty**

###### **TTL Response:**

The proposed increase in penalty to Rs.10,000 per day for the first seven days and Rs.20,000 per day thereafter appears to be excessive and unjustified. In practice, delays in compliance or submission of information may occasionally occur due to genuine technical, operational, or procedural issues, which are largely unintentional in nature.

TTL therefore firmly believes that no penalty should be imposed for such unintentional delays, especially when they do not result in any adverse impact on customers or service delivery.

##### **(b). Maximum Cap on Penalty**

###### **TTL Response:**

The proposed increase in the maximum penalty limit from Rs.2,00,000 to Rs.5,00,000 per instance appears to be excessive and disproportionate. Such a steep enhancement may not be commensurate with the nature of non-compliance, particularly in cases where delays or omissions are procedural or unintentional and have no adverse impact on consumers or the market as covered in point no. (a) above.

TTL therefore requests the Authority to reconsider the proposed increase and not impose any such penalty cap. Given that these instances are largely administrative in nature and do not result in customer harm, TTL firmly believes that no financial penalty should be levied in such cases.

## **2. Insertion of New Sub-Clause 7 (iv): Interest on Delayed Payment of Financial Disincentive**

### **New Provision Proposed:**

- If the service provider fails to pay the financial disincentive within the stipulated period, interest shall be charged at 2% above SBI's one-year MCLR, applicable at the start of the financial year.
- Partial month counted as full month for interest calculation.
- Month to be considered as per English calendar month.

### **TTL Response:**

TTL understands and appreciates the Authority's intent to ensure timely payments and accountability, the proposed provision to levy additional interest is not justified and would result in a high financial burden on TSPs.

Considering that such delays, if any, are generally unintentional and arise due to administrative, operational, or reconciliation processes, TTL respectfully submits that this clause may not be introduced. Eliminating this provision would ensure that the regulatory framework remains fair, practical, and proportionate, without imposing undue financial burden towards compliance.

## **3. Deletion of Clause 7A (Principal Tariff Order, 1999)**

### **Existing Clause 7A:**

- Pertains to financial disincentive related to metering and billing accuracy (overlap with QoS regulations).

### **Proposed Amendment:**

- Clause 7A to be deleted.

### **TTL Response:**

We agree with TRAI's proposal to delete Clause 7A, as all financial disincentives related to metering and billing accuracy are already comprehensively covered under the Quality of Service (Code of Practice for Metering and Billing Accuracy) Regulations, 2023. This deletion will avoid duplication and bring greater clarity to the regulatory framework. We further request Authority to collaborate with industry to discuss and reduce financial burden in meeting various compliance requirements.

We request the Authority to kindly consider our above suggestions while finalizing the amendment. A balanced approach that ensures compliance without imposing excessive financial burden on service providers would better serve the overall objectives of the regulation—namely, to enhance consumer protection, encourage timely compliance, and support a sustainable and competitive telecom ecosystem.

We remain committed to working collaboratively with the Authority in achieving these objectives and ensuring continued improvement in the quality of telecom services in the country.