



# 1939, 9<sup>th</sup> MAIN, 27<sup>th</sup> CROSS, BANASHANKARI 2<sup>nd</sup>  
Stage, BENGALURU - 560070  
**Phone:** 6364928222  
**E-Mail :** [ccsbng@gmail.com](mailto:ccsbng@gmail.com)  
**Website:** [ccsbng.org](http://ccsbng.org)

6<sup>th</sup> April 2026

To,

**Shri. Deepak Sharma,**  
Advisor (QoS-II), TRAI  
New Delhi

Sir,

**Subject:- Consultation on Draft Telecom Commercial Communications Customer Preference (Third Amendment) Regulations, 2026**

We are TRAI's authorised CAG for Karnataka State.

We have attached our comments on the above consultation paper for your consideration. We have split the comments/suggestions into 2 sections, with the first part as General Observations focussed on the present approach to tackle UCC and the second part with specific modifications to the clauses in the regulations as per the format provided by you.

Thanking you,

Yours sincerely

Gopal Ratnam V  
Secretary

**Comments on**  
**Consultation Paper on Draft Telecom Commercial Communications**  
**Customer Preference (Third Amendment) Regulations, 2026.**

**1. General Observations.**

**Consumer Care Society wholeheartedly endorses the continued efforts of TRAI to be upgrade the regulations for Commercial Communications with the objective to eliminate the scourge of UCC in India.** The consultation paper which is an initiative in this direction with this evolution of the TCCPR moving to a more proactive enforcement with the inclusion of voice spam (A2P) calls, tighter implementation and stricter penalty on the violators, is welcome.

**However, we would like to highlight a few possible dangers that are likely to arise with this approach.**

I. With the regulations providing more preference options to the subscriber (multiple categories + modes + time bands + opt-in/opt-out combinations), the effectiveness of the regulations may be undermined as customer faces choice overload. The impact of choice overload on consumer behavior have been scientifically researched with the conclusion that it leads to negative outcomes like Lower Consumer engagement, Opting for default Settings due to Interia and making Poor decisions due to Congitive fatigue and Bounded rationality. This could result in

- 1. Lower Subscriber participation**
- 2. Poor preference Selection**
- 3. Continued exposure to unwanted communication**
- 4. Increased frustration and distrust among Telecom users**

II. Another major drawback of this framework is the increasing load on the consumer to tackle the UCC. In addition to the load of choosing from many option mentioned in (I), the consumer has to make complaints for the regulations to be more effective. With a strict timeline and quite a onerous complaint procedure, the consumer would be reluctant to actively complain. The friction in the process should be reduced for more consumer participation.

III. Thirdly, the approach is still reactive and harms due UCC would be happening. With the AI/ML technology increasing incorporated in the telecom network, a pro-active, real time blocking approach would have been a better approach resulting in less harm and better customer experience.

IV. Lastly, while we sincerely wish that the bane of UCC is effectively dealt by the introduction of these new regulations, we believe the bad actors are likely to circumvent these regulations through other pathways like Human driven (P2P) call farms, SIM Multiplication & Identity Fragmentation and Consent Laundering.  
**Hence there is a need for a broad based multi prong approach.**

**Consumer Care Society strongly endorses an approach which would be a simpler and guided control which would lead to better compliance and improved outcomes for consumers, as various scientific studies have concluded. This would be a behaviourally informed solution which would include aspects like Smart Defaults, Tiered Preference Architecture, Just in time Nudges which are all possible with AI assistance.**

## **2. Comments on Specific Provisions of the Regulations**

<b>Sl. No</b>	<b>Regulation No.</b>	<b>Sub-regulation / Item</b>	<b>Modification Proposed</b>	<b>Reasons / Justification (Customer Perspective)</b>
1	Reg. 2 (Explicit Consent)	Consent Definition	Mandate periodic renewal of consent (e.g., every 6 months) and user notification on usage	Prevents misuse of legacy consent and enhances consumer control
2	Reg. 4	A2P Calls Declaration	Mandate caller ID tagging as “Verified Business / Suspected Spam” for all A2P calls	Improves consumer awareness and enables informed decision-making before answering calls
3	Reg. 21A	AI/ML Detection	Introduce consumer-facing alerts for suspected spam calls/messages	Enhances transparency and empowers users; reduces dependence on post-facto complaints
4	Reg. 21A(e)	Threshold for Action	Add volume-based trigger (e.g., high-frequency calls to multiple users) in addition to complaint thresholds	Current complaint-based thresholds are slow; high-volume spam can affect thousands before action
5	Reg. 25(3)	Complaint Time Limit	Extend complaint window from 7 days to 10/15 days	Consumers often delay reporting; current limit leads to loss of valid complaints
6	Reg. 25	Complaint Mechanism	Enable one-click complaint through call logs/SMS apps with auto-capture of details	Reduces friction and increases reporting rates, improving enforcement effectiveness
7	Reg. 23	Appeal Mechanism	Provide online unified portal/app for complaints and appeals	Improves accessibility, transparency, and user experience

<b>Sl. No</b>	<b>Regulation No.</b>	<b>Sub-regulation / Item</b>	<b>Modification Proposed</b>	<b>Reasons / Justification (Customer Perspective)</b>
8	Reg. 34A	Call Management Apps	Allow regulated tagging/blocking by apps based on transparent criteria and TRAI audit	Prevents weakening of consumer protection tools like spam filters
9	Reg. 3 / 25	Sender Classification	Define clear criteria and safeguards to prevent misuse of relaxed treatment for large entities	Ensures fairness and prevents regulatory arbitrage
10	Schedule-I	Template Validation	Introduce AI-based secondary validation of content templates	Reduces misclassification of promotional content as service messages
11	Reg. 21A + 25	AI + Complaint Integration	Mandate real-time throttling/blocking of suspected spam before threshold breach	Shifts system from reactive to preventive
12	New Provision	Consumer Dashboard	Introduce centralized dashboard for consent management, complaint tracking, and preferences	Empowers consumers and improves trust in regulatory framework
13	Reg. 27	Disincentives	Introduce penalties for access providers for delayed or poor complaint handling	Ensures accountability of telecom operators

Gopal Ratnam V  
Secretary