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12<sup>th</sup> June 2026

**Shri Vivek Khare**

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New Delhi – 110029

**Subject: Bharti Airtel's Comments on TRAI's Draft Notification on the *Telecom Consumer Complaint Redressal (4<sup>th</sup> Amendment) Regulation, 2026***

**Reference: TRAI's Consultation Paper dated 07<sup>th</sup> May 2026**

Dear Sir,

This is in reference to TRAI's Draft Notification on the *Telecom Consumer Complaint Redressal (4<sup>th</sup> Amendment) Regulation, 2026* dated 07<sup>th</sup> May 2026.

In this regard, please find enclosed our comments to the draft regulation for your kind consideration.

Thanking You,

Yours Sincerely,

For **Bharti Airtel Limited**

A handwritten signature in blue ink, appearing to read 'Rahul Vatts', is written over a light blue circular stamp.

**Rahul Vatts**

Chief Regulatory Officer

**Encl: a.a**

**Preamble:**

1. Airtel thanks the Authority for the opportunity to submit its comments on the Draft Notification on the “Telecom Consumers Complaint Redressal (Fourth Amendment) Regulation, 2026”, issued on 7<sup>th</sup> May 2026.
2. **Airtel remains strongly committed to consumer satisfaction and has consistently invested in world-class grievance redressal systems.** As India’s leading integrated telecommunications company, serving over 373 million customers across the country, Airtel recognizes the importance of an effective, accessible and consumer-centric complaint resolution framework.
3. India’s telecommunications sector is now central to the country’s digital economy. With over a billion internet subscribers and rapidly expanding 5G coverage, telecom connectivity supports commerce, healthcare, education, financial inclusion and public service delivery. In this context, consumer trust in the telecom ecosystem is of national importance.
4. Over the years, **Airtel has consistently invested in advanced digital and AI-led capabilities to strengthen customer experience and grievance redressal. These initiatives include intelligent automation, predictive analytics, AI-enabled customer support, self-care tools, and digital workflows that enable faster identification, routing, and resolution of consumer issues.** Such technology-led interventions have improved accessibility, reduced manual dependencies, enhanced consistency of responses, and enabled quicker resolution for customers.
5. In this context, the **regulatory framework should encourage continued innovation and adoption of AI-driven solutions, rather than prescribe rigid process requirements that may limit the ability of TSPs to deploy evolving technologies for better consumer outcomes.**
6. For instance, the draft provisions on IVRS design merit careful reconsideration, as they appear to rely on a legacy model of customer interaction that both the industry and consumers are steadily moving beyond. **A hierarchical, menu-driven IVR — requiring consumers to navigate multiple prompts for language, complaint category, and sub-category — may remain relevant in certain contexts, but it should not be treated as the default or mandatory architecture for consumer grievance redressal. Such systems are often friction-heavy, time-consuming, and less aligned with evolving consumer expectations for intuitive, digital-first support.**
7. It is pertinent to note that the TSPs are increasingly deploying conversational voice AI capable of understanding natural language intent without rigid menu flows; intelligent virtual assistants that can authenticate users, classify issues, and support resolution within a single interaction; and proactive service systems that can identify service degradation affecting specific consumers and initiate outreach even before a complaint is raised. These technologies are already live, scalable, and capable of delivering better consumer outcomes than traditional structured IVR trees.
8. The regulatory framework should therefore remain technology-neutral and outcome-focused, enabling TSPs to adopt the most effective customer interaction models as they evolve. Mandating a fixed IVRS architecture risks entrenching legacy systems and limiting innovation in consumer service delivery. A progressive, consumer-centric framework should instead encourage solutions that reduce friction, improve accessibility, and enable faster, more effective complaint resolution.

9. Airtel fully supports TRAI's objective of modernizing and standardizing the grievance redressal framework to strengthen consumer trust and transparency. However, certain provisions of the Draft Amendment require recalibration so that the framework remains proportionate, practical and aligned with actual consumer benefit.
10. As currently framed, some provisions may impose disproportionate compliance burdens, operationally impractical timelines and punitive financial consequences without adequate procedural safeguards. These concerns risk shifting focus from meaningful consumer outcomes to procedural compliance.
11. Accordingly, Airtel respectfully submits its detailed concerns and recommendations below, with a request that TRAI adopt a balanced, outcome-oriented model that safeguards consumer interests while ensuring operational feasibility, proportionality and regulatory certainty for service providers.

**A. The Transformed Telecommunications Landscape: The 2012 Framework Cannot Be Recast Without Evidence of Consumer Harm**

1. India's telecom sector has undergone a structural transformation since 2012. A largely voice-led 2G/3G market has now evolved into a full-scale digital communications ecosystem supported by nationwide 4G and 5G networks, smartphones, cloud-based services, digital payments, content platforms, enterprise applications and real-time data services. Airtel has made sustained and substantial investments to support this transition and to deliver high-quality connectivity at national scale.
2. In this changed environment, consumer experience is no longer determined solely by the performance of the telecom network. It is increasingly influenced by handsets, operating systems, applications, content providers, cloud platforms, device settings, indoor coverage conditions and other third-party ecosystem elements that are outside the direct control of TSPs. A grievance redressal framework that attributes every consumer experience issue to the service provider would therefore be both technically inaccurate and regulatory unfair.
3. The Telecom Consumers Complaint Redressal Regulations, 2012 have provided a stable, predictable and workable complaint redressal architecture for more than a decade. This framework has enabled consumers to raise complaints, track resolution and escalate grievances through defined channels, while giving TSPs sufficient operational flexibility to improve systems and processes over time.
4. Accordingly, any material departure from this established framework should be based on clear evidence of systemic consumer harm, demonstrable gaps in the existing mechanism and a reasoned assessment that the proposed change will deliver measurable incremental benefit. **Prescriptive obligations should not be introduced merely because technology permits a different process; they must be justified by necessity, proportionality and likely consumer impact.**
5. The regulatory objective should therefore be to strengthen outcomes, not to prescribe rigid operating models. The framework should enable the service provider to identify the nature of the complaint, communicate transparently with the consumer, resolve matters within its control, and redirect or close matters fairly where the root cause lies outside the TSP's network or systems. **Penalizing TSPs for factors beyond their control would not improve consumer redressal; it would only create defensive compliance, higher operational cost and avoidable disputes.**

## B. Official Language Mandate: Prescriptive Expansion Without Demonstrated Consumer Need

1. **Airtel submits that the proposed mandate to provide Complaint Centre services in all official language(s) of each State is neither necessary from a consumer-protection perspective nor proportionate from an implementation perspective.** Airtel fully recognizes the importance of linguistic accessibility and already provides extensive multilingual support based on actual subscriber needs and usage patterns.
2. **Airtel has put in place a robust multilingual customer-service framework. Customer care, including complaint redressal, is presently available in English, Hindi and approximately 10–12 major regional languages,** selected on the basis of subscriber concentration and circle-level usage. The absence of material consumer demand for additional language options demonstrates that the existing framework is substantially meeting practical consumer requirements.
3. A blanket mandate for all official State languages is operationally impractical. It is worth noting that language expansion is not a simple translation exercise; it requires trained IVR designers, voice talent and agents with telecom domain knowledge, material changes to live CRM systems, self-care portals and IVR trees, and extensive regression testing to avoid service disruption.
4. Each additional language also increases IVR menu depth and navigation complexity, resulting in longer customer journeys, higher abandonment risk and a poorer experience for the very consumers the provision seeks to assist.
5. Technology-enabled solutions, including AI-based translation and text-to-speech, are still not reliable enough for regulatory-grade complaint handling across all languages. In low-resource languages, such tools may generate unclear audio, incomplete sentences or inaccurate communication of critical information such as tariffs, charges and consent. In a complaint environment, such inaccuracies may themselves cause consumer harm.
6. The proposed mandate would also impose substantial recurring cost. Each additional language requires dedicated or semi-dedicated staffing, training, quality monitoring and rostering. Where call volumes are low, such resources would remain underutilized, increasing cost and complexity without commensurate consumer benefit.
7. There is also **no comparable cross-sector precedent for mandating all official State or Eighth Schedule languages in front-line grievance mechanisms. Other regulated sectors generally follow a flexible, outcomes-based approach that balances accessibility with feasibility. Telecom should not be subjected to a uniquely onerous obligation without demonstrated consumer detriment.**
8. **Accordingly, Airtel submits that the proposed clause requiring Complaint Centre services in all official State languages should be deleted. TSPs should be permitted to determine additional regional language offerings, and the mode of provisioning such support, based on consumer demand, technical readiness and operational feasibility.**
9. TSPs remain committed to enhancing linguistic accessibility in line with actual consumer needs and technological maturity. However, a prescriptive language-wise mandate of the nature proposed would create disproportionate complexity with limited incremental consumer benefit.

### **C. Print Publication Requirement: An Obsolete and Disproportionate Compliance Obligation**

1. The continued requirement to publish Complaint Monitoring System details and grievance-related information in print media is no longer aligned with prevailing consumer behaviour or the objective of timely grievance redressal. In a digital-first environment, such publication has limited practical utility and imposes a disproportionate compliance burden.
2. **Consumers today primarily access service information through mobile applications, websites, SMS, email and other digital channels. Print publication does not serve the needs of consumers seeking immediate assistance, particularly in time-sensitive situations such as service disruption or network outages.**
3. The limitation is more acute in rural and remote areas, where physical newspaper circulation may be delayed, irregular or limited. A consumer facing an immediate connectivity issue cannot reasonably be expected to rely on a printed notice for actionable grievance-related information.
4. A more effective and consumer-centric approach would be to permit digital dissemination through the service provider's website, mobile application, SMS, email and app-based notifications. These channels are faster, targeted, auditable and consistent with actual consumer usage patterns.
5. **Accordingly, Airtel submits that the print-publication requirement should be dispensed with and replaced by a digital-first disclosure framework that better serves consumer convenience, speed of access and regulatory transparency.**

### **D. Avoiding Duplication: Preserve Effective Existing Mechanisms and Ensure Regulatory Harmonization**

1. Airtel already operates a mature, multi-channel and technology-enabled grievance redressal framework that substantially delivers the outcomes sought under the Draft Amendment. The Airtel app enables complaint registration, real-time tracking, escalation and resolution confirmation through a single integrated interface.
2. Airtel is also committed to inclusive service delivery and has implemented accessibility features for Persons with Disabilities in line with applicable Government of India guidelines. Any additional obligation should therefore be outcome-based and should not duplicate existing process requirements that are already operational.
3. Also, the complaint timelines and procedures under the Draft Amendment should be harmonized with the Quality-of-Service Regulations, the TCCCPR 2018 and the TCPR 2012. A fragmented approach may create overlapping, inconsistent or conflicting obligations, whereas a harmonized framework would promote clarity, compliance certainty and better consumer outcomes.

### **E. Financial Disincentives: Punitive and Disproportionate to Consumer Outcomes**

1. Airtel submits that the proposed Financial Disincentive framework should not be introduced. Consumer interest is best served through a simple, responsive and customer-friendly redressal mechanism, not through a penalty-led regime that may convert grievance handling into defensive compliance.
2. The telecom sector already has strong market-based discipline. Poor consumer experience directly results in churn, reputational harm and loss of business. These commercial incentives are more immediate and effective than additional regulatory penalties.

3. The proposed triggers, including “improper dismissal” and “unsatisfactory disposal”, are inherently subjective. Complaint resolution often depends on case-specific facts, technical verification, network conditions and third-party ecosystem factors such as devices, operating systems, applications and content platforms. Penal consequences should not follow unless there is clear negligence, general default or demonstrable consumer harm.
4. The proposed amounts of ₹1,000 per complaint and ₹5,000 per appeal could create significant financial exposure based on subsequent audit interpretation rather than objective proof of non-compliance. This would be disproportionate and may shift focus from speedy resolution to procedural risk management.
5. Also, the proposed provision creates continuing financial exposure based on audit findings and risks duplicating consequences already available under the QoS and other applicable regulatory frameworks. Such duplication would be unfair, excessive and inconsistent with sound regulatory practice.
6. **Accordingly, Airtel submits that the proposed Financial Disincentive provisions, should be deleted.**

**F. Implementation Timeline: Transition Period Required for System and Process Readiness:**

1. Airtel submits that the proposed Regulation should be implemented through a calibrated, light-touch and transition-sensitive approach, having regard to the maturity of the sector, effective competition and the disciplining effect of mobile number portability. The Draft Regulation, if implemented in existing shape, entails substantial changes to customer-service platforms, network interfaces, IT systems, reporting architecture and cross-functional operating processes. These changes will require detailed impact assessment, system development, integration, testing, process redesign, training and stabilization before operational roll-out.
2. Accordingly, Airtel requests that the Regulation be brought into force only after a minimum period of six months from the date of its notification.

**G. Survey Obligations: Prescriptive Compliance Without Demonstrable Consumer Gain**

1. Airtel submits that a separate regulatory mandate for complaint-resolution surveys is neither necessary nor proportionate. TSPs already operate mature, multi-channel grievance redressal and feedback mechanisms that capture consumer experience through complaint registration, closure confirmation, appellate escalation, digital self-care interfaces, assisted support channels and continuous service-quality monitoring.
2. These existing mechanisms provide operationally relevant, real-time feedback and support prompt corrective action. Mandating an additional survey for every formal complaint or appeal would duplicate established processes, increase compliance overhead and divert operational focus from substantive complaint resolution to parallel reporting requirements.
3. Survey outcomes are also inherently variable and may not reliably reflect resolution quality across complaint types, customer segments, network conditions and service contexts. A prescriptive survey requirement may therefore create form-over-substance compliance without delivering measurable incremental consumer protection.

4. **Accordingly, Airtel requests the Authority to drop the proposed standalone survey requirement and permit TSPs to continue using their existing feedback systems in a flexible, outcomes-based manner that supports timely resolution, service improvement and consumer convenience.**

#### **H. Reporting Obligations: Excessive Granularity Without Commensurate Consumer Benefit**

1. Airtel submits that any reporting framework must be practical, proportionate and clearly linked to measurable consumer outcomes. Reporting should strengthen grievance redressal, not create parallel compliance layers that divert resources from actual complaint resolution.
2. The proposed granular KPI-based reporting requirements may impose significant operational and compliance burden without commensurate consumer benefit. Airtel already monitors complaint-handling and service-quality parameters on a continuous basis to support effective grievance management, timely corrective action and ongoing service improvement.
3. Additional reporting on complaints, appeals and survey metrics would therefore duplicate existing monitoring systems and add limited regulatory value. Highly disaggregated data, when viewed without operational context, may also lead to incomplete or distorted conclusions, particularly where complaint volumes are influenced by location-specific constraints, network conditions, device issues or other factors beyond the immediate control of the TSP.
4. Excessive reliance on raw granular metrics may encourage repetitive complaint behavior, increase avoidable pressure on grievance channels and shift focus from substantive resolution to procedural reporting. Such an approach would be disproportionate to the likely benefit and inconsistent with ease of doing business.
5. **Accordingly, Airtel submits that TRAI should adopt a light-touch, outcomes-oriented reporting framework that avoids duplication, preserves operational flexibility and enables service providers to focus resources on timely complaint resolution and service improvement.**

#### **I. Round-the-Clock Complaint Centre: Existing Framework Already Ensures Continuous Consumer Access**

1. Airtel submits that the existing requirement for Complaint Centre operations from 0800 hrs to 2400 hrs is well calibrated, consumer-centric and operationally efficient.
2. Also, consumers already have 24x7 access to complaint registration and essential support through IVR, mobile applications, websites and other digital interfaces. Complaints and service requests can therefore be lodged at any time, and the objective of continuous accessibility is already being met under the present framework. The digital and automated channels already provide uninterrupted access for complaint lodging.
3. Moreover, the existing model is also consistent with practices followed in other service sectors, including banking, where 24x7 digital access is provided while staffed assistance operates within defined service windows. The current telecom framework therefore reflects a balanced and widely accepted service-delivery model.
4. **Accordingly, Airtel submits that the existing complaint centre window of 0800 hrs. to 2400 hrs., supplemented by 24x7 IVR and digital complaint-registration channels, adequately safeguards consumer interests and should be retained in its current form.**

**J. IVRS Architecture: Preserve a Functional Framework and Avoid Procedural Duplication**

1. Airtel submits that the existing complaint-handling framework, including the current IVRS architecture, is robust, consumer-centric and operationally efficient, and should therefore be retained.
2. The present IVRS structure enables consumers to identify the nature of their grievance at the outset and ensures appropriate routing to the relevant resolution channel or trained agent. This minimizes misdirection, reduces handling time and supports faster, more accurate complaint resolution.
3. The proposed introduction of a separate "Appeal" option at the initial IVRS or digital-entry stage is unwarranted and may be counterproductive. An appeal is not a first-instance grievance category; it is a subsequent remedy available only after a complaint has been resolved and the consumer remains dissatisfied. Presenting "Appeal" as a parallel entry-stage option may create consumer confusion, duplicate process flows and weaken routing efficiency.
4. The existing complaint and service-request options are sufficient to capture consumer issues comprehensively. Any appeal against complaint resolution can continue to be handled within the existing channel architecture without creating a distinct entry-level menu option.
5. **Accordingly, Airtel submits that the current IVRS architecture should be preserved in the interest of clarity, continuity, consumer convenience and effective grievance redressal.**

**In addition, a clause-wise response to the draft regulation is enclosed as Annexure – A for kind consideration of the Authority.**

Airtel remains fully committed to the Authority's objective of building a world-class, consumer-centric grievance redressal ecosystem in India's telecom sector. We believe that a well-calibrated regulatory framework one that combines clear standards, sufficient operational flexibility, proportionate enforcement, and adequate implementation timelines will deliver far better consumer outcomes than one premised on prescriptivism and heavy financial disincentives.

Airtel urges the Authority to adopt a calibrated, consultative, and implementation-sensitive approach and consideration of our concerns and recommendations set out in this submission before finalizing the Fourth Amendment. Airtel is available for any consultation, technical discussion, or additional submissions that the Authority may require.

We look forward to a continued constructive partnership in advancing the interests of India's telecom consumers.

**In summary:**

- ✓ ***Airtel supports strengthening grievance redressal, but the framework must be outcome-based, proportionate, and operationally feasible, not overly prescriptive.***
- ✓ ***The existing regime has been stable and effective for over a decade; any significant changes should be backed by clear evidence of systemic consumer harm.***
- ✓ ***Consumer experience is increasingly influenced by devices, apps, and third-party platforms, and TSPs cannot be held accountable for all service issues.***

- ✓ *A blanket requirement to support all state languages will increase complexity, cost, and IVR inefficiency without demonstrated consumer demand.*
- ✓ *The current IVRS architecture should be preserved in the interest of clarity, continuity, consumer convenience and effective grievance redressal.*
- ✓ *In a digital-first environment, printing grievance information in newspapers is obsolete and ineffective; digital channels are faster, targeted, and more relevant.*
- ✓ *Airtel already operates robust, multi-channel complaint systems; new regulations should not duplicate processes or create parallel compliance structures.*
- ✓ *Existing complaint center window of 0800 hrs. to 2400 hrs., supplemented by 24x7 IVR and digital complaint-registration channels **already ensures accessibility and continuous complaint logging**. This adequately safeguards consumer interest and should be retained in its current form.*
- ✓ *Mandatory surveys and excessive KPI reporting impose high compliance burden with limited consumer benefit.*
- ✓ *Financial Disincentive provisions should be deleted. Proposed penalties based on terms like "unsatisfactory disposal" are subjective, disproportionate, and may drive defensive compliance instead of better outcomes.*
- ✓ *Given the significant system and process changes in the draft amendment, if implemented in this shape, at least 6 months' transition period is necessary.*

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**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
1	<b>1. Short title, extent and commencement.</b>		
	(1) These regulations may be called the Telecom Consumers Complaint Redressal Regulations, 2012.	-	No changes proposed.
	(2) They shall come into force from the date of their publication in the Official Gazette.	<p>The Draft Regulation, if implemented in existing shape, entails substantial changes to customer-service platforms, network interfaces, IT systems, reporting architecture and cross-functional operating processes. These changes will require detailed impact assessment, system development, integration, testing, process redesign, training and stabilization before operational roll-out.</p> <p>Accordingly, Airtel requests that the Regulation be brought into force only after a minimum period of at least 6-9 months from the date of its notification.</p>	<b>These shall come into force after 6-9 months from the date of their publication in the Official Gazette.</b>
	<p>(3) <del>These regulations shall apply to all service providers, including Bharat Sanchar Nigam Limited and Mahanagar Telephone Nigam Limited, being the companies registered under the Companies Act, 1956 (1 of 1956)] providing,--</del></p> <p>(i) <del>Basic Telephone Service;</del></p> <p>(ii) <del>Unified Access Services;</del></p> <p>(iii) <del>Cellular Mobile Telephone Service;</del></p> <p>(iv) <del>Internet Service;</del></p> <p>(3) These regulations shall apply to all service providers having, --</p> <p>(i) Unified Access Service Licence,</p> <p>(ii) Unified Licence with Authorization</p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>for Access Service,                      (iii) Internet Service Authorization under any licence,                      (iv) Main Service Authorization under the Telecommunication Act, 2023, for providing Access (Wireline, Wireless) or Internet Services;"</p> <p><i>Provided that</i> nothing contained in these regulations shall <del>apply to</del> be mandatory, for compliance by an Internet Service Provider <del>whose turnover in any preceding financial year does not exceed rupees five crore or</del> whose total number of subscribers in the preceding financial year does not exceed ten thousand numbers, as the case may be. However, such Service Providers may voluntarily follow the provisions of this regulation and establish a suitable mechanism for redressal of consumer complaints.</p>		
2	<p><b>2. Definitions.</b>----In these regulations, unless the context otherwise requires,-</p>	-	-
	<p>(a) <b>“Act”</b> means the Telecom Regulatory Authority of India Act, 1997 (24 of 1997);</p>	-	-
	<p>(b) <del>“Advisory committee” means Advisory Committee established under regulation 11, by a service provider;</del> <b>“Access Service”</b> means the telecommunication service provided by an authorised entity to users for conveyance of voice or non-voice messages through wireline or wireless telecommunication network,</p>	<p>We request the Authority to keep the definitions consistent across the Regulations.</p> <p>Therefore, this definition should be replaced with the definition used in ‘The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline And Wireless) Service Regulations, 2024’.</p>	<p>The definitions used in ‘The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline And Wireless) Service Regulations, 2024’ are as below:</p> <p><b>“Access Service (Wireless)” means telecommunication service provided</b></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>and the words “wireline access service” and “wireless access service” shall be construed accordingly.</p>		<p>through a wireless telecommunication under access service authorization;</p> <p>“Access Service (Wireline)” covers collection, carriage, transmission, and delivery of voice or non-voice messages over the Public Switched Telephone Network in a licensed or authorized service area and includes the provision of all types of services except those requiring a separate license or authorization;</p>
	<p>(c) “Appellate Authority” means Appellate Authority appointed under regulation 10, by a service provider;</p>	-	No changes proposed.
	<p>(d) “Authority” means the Telecom Regulatory Authority of India established under subsection (1) of section 3 of the Act;</p>	-	No changes proposed.
	<p>(e) <del>“Basic Telephone Service” covers collection, carriage, transmission and delivery of voice or non-voice messages over licensee’s Public Switched Telephone Network in licensed service area and includes provision of all types of services except those requiring a separate licence;</del></p>	<p>It is pertinent to note that the Unified License regime is still in place, therefore, the definitions/references should continue to be aligned accordingly.</p>	<p>“Authorization” means the authorization as defined in the Telecommunications Act, 2023 or Unified License.</p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p><b>“Authorization”</b> means the authorization as defined in the Telecommunications Act, 2023;</p>		
	<p>(f) <del><b>“Broadband” or “Broadband Service” means a data connection that is able to support interactive</b></del> services including Internet access and has the capability of the minimum download speed of five hundred and twelve kilo bits per second (512 kbps) to an individual subscriber from the point of presence (POP) of the service provider intending to provide Broadband service.}]</p> <p><b>“Broadband”</b> means a data connection, through wireless or wireline access media, that is able to support interactive services including Internet access and has the capability of delivering the minimum download speed, as specified by licensor from time to time, to an individual subscriber from the point of presence (POP) of the service provider intending to provide broadband service;</p> <p>(fa) <b>“Broadband Service”</b> means a data service provided using broadband data connection by Internet Service Provider or Wireless Access Service Provider under any license or authorization;</p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>(g) <del>“Cellular Mobile Telephone Service”-</del></p> <p>(i) <del>means telecommunication service provided by means of a telecommunication system for the conveyance of messages through the agency of wireless telegraphy where every message that is conveyed thereby has been, or is to be, conveyed by means of a telecommunication system which is designed or adapted to be capable of being used while in motion;</del></p> <p>(ii) <del>refers to transmission of voice or non-voice messages over Licensee’s Network in real time only but service does not cover broadcasting of any messages, voice or nonvoice, however, Cell Broadcast is permitted only to the subscribers of the service;</del></p> <p>(iii) <del>in respect of which the subscriber (all types, pre-paid as well as post-paid) has to be registered and authenticated at the network point of registration and approved numbering plan shall be applicable;</del></p>	-	No changes proposed.
	<p>(h) <b>“Complaint Centre”</b> means a facility established under regulation 3 by the service provider;</p> <p>(ha) <b>“Complaint Monitoring System”</b> means any world wide web based system</p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>using client server architecture or other similar architecture to register, track/monitor and manage consumer/subscribers' complaints as established under sub-regulation (1) of regulation 6;</p> <p>(i) <b>“Consumer”</b> means a consumer of a service provider to whom these regulations apply and includes its customer and subscriber;</p> <p>(j) <b>“Consumer Care Number”</b> means a telephone number earmarked by a service provider to access its Complaint Centre;</p> <p>(k) <b>“General Information Number”</b> means a telephone number earmarked by a service provider for providing information to the consumer in response to their query or request;</p> <p>(ka) <b>“Grievance Redressal Mechanism”</b> means the harmonious interworking of people, process, policies and the Complaint Monitoring System as per the extant regulation encompassing complaint centre and the Appellate Authority;</p>		
	<p>(l) <b>“Internet Service”</b> means all types of Internet access or Internet content services as provided in the licence/ authorization;</p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	(m) <b>“Licence”</b> means a licence granted or having effect as if granted under section 4 of the Indian Telegraph Act, 1885(13 of 1885) as amended from time to time;	-	No changes proposed.
	(n) <b>“Regulations”</b> means the Telecom Consumers Complaint Redressal Regulations, 2012;	-	No changes proposed.
	(o) <b>“Service Provider”</b> means any service provider having License/ Authorization as mentioned under sub regulation (3) of regulation 1;	-	No changes proposed.
	<p>(p) <b>“Service Request”</b> means a request made to a service provider by its consumer pertaining to his account, and includes, ----</p> <ul style="list-style-type: none"> <li>(i) a request for change of tariff plan;</li> <li>(ii) a request for activation or deactivation of a value added service or a supplementary service or a special pack;</li> <li>(iii) a request for activation of any service available on the service provider’s network; and</li> <li>(iv) a request for shift or closure or termination of service or for billing details;</li> </ul> <p>(pa) <b>“Service Query”</b> means any query made by the consumer regarding the services provided by the Service Provider;</p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>(q) "SMS" means a message which is sent through short message service and includes a Multi Media message which is sent through Multi Media message service (MMS);</p> <p>(qa) "Survey" means Online Consumer Survey taken upon the resolution or closure of any formal complaint/appeal;</p>	<ol style="list-style-type: none"> <li>1. Airtel submits that the proposed introduction of surveys as a regulatory requirement is neither necessary nor proportionate in the present framework, particularly when TSPs are already operating mature, multi-channel complaint redressal and customer feedback mechanisms.</li> <li>2. Airtel already follows industry best practices in consumer grievance management through structured complaint registration, closure confirmation, appellate escalation, digital self-care interfaces, assisted support channels and continuous service quality monitoring across touchpoints. These mechanisms enable real-time capture of consumer experience and support prompt corrective action in a far more operationally relevant manner than a separate prescribed survey process.</li> <li>3. Further, survey-based outcomes can be inherently variable and may not reliably reflect the quality of complaint resolution across different complaint types, customer segments and service contexts. Mandating an additional survey layer would therefore create avoidable compliance and operational overhead, without a commensurate enhancement in consumer protection.</li> </ol> <p><b>Therefore, the regulatory framework should recognize and build upon the robust consumer-centric practices already implemented by TSPs, rather than impose duplicative processes that risk</b></p>	<p><b>Airtel submits that the proposal of 'Survey' be dropped.</b></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
		<p>form-over-substance compliance. The draft itself acknowledges that consumer engagement modes have significantly evolved beyond traditional channels, with increasing reliance on digital interfaces such as mobile applications, web portals, chatbots and email; accordingly, a flexible outcomes-based framework would better serve consumer interest than prescriptive survey requirements.</p>	
	<p>(r) <del>“system” means the ‘Web Based Complaint Monitoring System’ established under subregulation of regulation 6.</del></p>	-	No changes proposed.
	<p>(s) <del>“Unified Access Services”,</del>                      (i) <del>means telecommunication service provided by means of a telecommunication system for the conveyance of messages through the agency of wired or wireless telegraphy;</del>                      (ii) <del>refers to transmission of voice or non-voice messages over Licensee’s Network in real time only but service does not cover broadcasting of any messages, voice or non-voice, except, Cell Broadcast which is permitted only to the subscribers of the service;</del>                      (iii) <del>in respect of which the subscriber (all types, pre-paid as well as post-paid) has to be registered and authenticated at the network point of registration and approved numbering plan shall be applicable;</del></p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	(t) all other words and expressions used in these regulations but not defined, and defined in the Act and the rules and other regulations made there under, shall have the meanings respectively assigned to them in the Act or the rules or other regulations, as the case may be.	-	No changes proposed.
3	<p><b>3. Establishment of Complaint Centre</b></p> <p>(1) Every service provider shall, within forty-five days from the date of commencement of these regulations, establish a Complaint Centre for redressal of complaints and for addressing service requests of its consumers;</p> <p><i>Provided that</i> the Call Centre, setup by the service provider in accordance with the Telecom Consumers Protection and Redressal of Grievances Regulations, 2007 (3 of 2007) dated 4<sup>th</sup> May, 2007, shall continue to be the Complaint Centre for the purpose of these regulations;</p> <p><i>Provided further</i> that a service provider, who is providing different services in a licensed service area, may, at its option, set up one or more Complaint Centres, being common or separate, for such services being provided by it;</p> <p><i>Provided also</i> that a Complaint Centre for a service area shall provide the service in the <del>local language of that service area in</del></p>	<p>1. <b>Existing framework already ensures meaningful linguistic accessibility:</b> Airtel has proactively developed a robust multilingual customer support framework covering English, Hindi, and key regional languages based on subscriber distribution and usage patterns. This approach aligns with the intent of the existing 2012 regulations and has been continuously refined based on customer feedback, with no material evidence of unmet demand.</p> <p>2. <b>Further expansion should be guided by practicality and service quality:</b> While enhancing language accessibility remains important, expanding into additional languages involves significant operational changes—such as specialized training, system integration, and validation—which require careful planning to ensure continuity and quality of service.</p> <p>3. Experience shows that adding multiple language layers can increase IVR complexity and navigation time. A balanced approach is therefore necessary</p>	<p><b>Airtel submits that the below proviso be deleted.</b></p> <p><del><i>Provided also</i> that a Complaint Centre for a service area shall provide the service in the local language of that service area in addition to Hindi and English official language/ languages of the state(s) in the licensed service area, in addition to Hindi and English as per the option exercised by the consumer.</del></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p><del>addition to Hindi and English official language/ languages of the state(s) in the licensed service area, in addition to Hindi and English as per the option exercised by the consumer.</del></p> <p><i>Provided also</i> that the Complaint Centre shall register appeal, if any, preferred by the consumer through Consumer Care Number <del>or separate dedicated number for the same.</del></p>	<p>to ensure that efforts to enhance inclusivity do not inadvertently impact ease of access and user experience. The current tools are not yet reliable enough for regulatory-grade use in all languages. Tests with several leading platforms, especially in low-resource languages such as Bodo and Manipuri, have revealed significant shortcomings: unclear or distorted audio, grammatically incomplete sentences, and inaccurate rendering of critical information such as tariffs, charges and consent statements.</p> <p>4. TSPs are actively evaluating AI-based and digital solutions to expand language capabilities. However, given the current limitations in accuracy—particularly for certain languages—a gradual adoption aligned with technological maturity would be more appropriate for complaint-handling scenarios requiring high precision.</p> <p>5. Allowing TSPs to determine language offerings based on actual demand, usage patterns, and operational feasibility ensures optimal resource utilization and effective service delivery. Similar outcome-based approaches are followed across sectors, balancing accessibility with efficiency.</p> <p>6. Notably, regulators in other sectors, including RBI and the Department of Consumer Affairs, also do not mandate support for all official languages in IVR systems, instead following a similar flexible</p>	

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
		<p>approach. In this context, a <b>principle-based and flexible framework, rather than a prescriptive language mandate, would better support the shared objective of inclusive, efficient, and high-quality customer service.</b></p>	
	<p>(2) Every service provider, who is granted a licence/authorization for any service mentioned under sub regulation (3) of regulation 1, after the commencement of these regulations, shall, before providing services, establish a Complaint Centre in its service area, for redressal of complaints and for addressing service requests of its consumers.</p>	-	No changes proposed.
	<p>(3) Every Complaint Centre shall be accessible to the customers <del>between 0800 hrs and 2400 hrs</del> <b>round the clock</b> on all days of the week.</p>	<p>1. <b>The existing framework is adequate, consumer-centric, and aligned with established industry practice:</b> The current requirement for staffed Complaint Centre operations from 0800 hrs to 2400 hrs is appropriately calibrated and continues to serve consumer interests effectively. It strikes a balanced approach between ensuring meaningful consumer access and preserving the operational efficiency necessary for effective complaint handling and resolution. The framework has functioned satisfactorily over time and has proven adequate in meeting consumer needs without compromising service quality.</p> <p>2. <b>Consumers already have 24x7 access through digital and automated channels:</b> Consumers presently experience uninterrupted access to complaint registration and essential support</p>	<p><b>The existing clause should be retained, i.e.:</b> <b>Every Complaint Centre shall be accessible to the customers between 0800 hrs and 2400 hrs on all days of the week.</b></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
		<p>services through IVR, mobile applications, websites, and other digital interfaces on a 24x7 basis. Accordingly, consumer access is not constrained by the operating hours as complaints and service requests may be lodged at any time. The objective of continuous accessibility is therefore already being fully met under the current framework.</p> <p>3. <b>The present model reflects operational realities and cross-sector practice:</b> The existing approach is also consistent with practices followed across other service sectors, including banking, where customers are provided 24x7 access to digital channels for lodging complaints and service requests. The telecom framework is therefore aligned with well-established and widely accepted service delivery practices.</p> <p>4. <b>The existing provision should be retained:</b> Retaining the current requirement for access to Complaint Centre operations between 0800 hrs and 2400 hrs, in addition to us continuing to provide 24x7 complaint registration through IVR and digital channels, represents a balanced and proportionate regulatory approach. It ensures continuous consumer access for complaint lodging while enabling TSPs to deploy resources efficiently towards timely, effective, and quality-driven grievance redressal.</p>	

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
		In view of the above, <b>the existing provision adequately safeguards consumer interests, reflects prevailing industry practice, including in the banking sector, and should be retained in its current form.</b>	
	5. Every service provider shall deploy sufficient number of employees at its Complaint Centres to meet the Quality of Service parameters, as may be specified by the Authority from time to time.	-	No changes proposed.
	6. Every service provider shall earmark or allot sufficient telephone lines or connections to the "Consumer Care Number" and ensure that its Complaint Centre is accessible to its consumers in person as well as through voice call, email and post.	-	No changes proposed.
	7. Every service provider shall ensure that the Complaint Center is also accessible through the network of other service providers by earmarking a specific number.	-	No changes proposed.
	8. The "Consumer Care Number" shall be toll free.	-	No changes proposed.
	9. The Authority may, through directions, issued from time to time, specify a uniform short code for "Consumer Care Number", which may be common <del>for Basic telephone services, Cellular mobile telephone service and Internet service,</del> or different for different	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	services.		
	<p>10. Every service provider shall ensure that an Interactive Voice Response System or IVRS, if installed on a “Consumer Care Number”, is operated in the following manner:-</p> <p>a. the first level of the IVRS provides for language selection;</p> <p><del>b. the second level of the IVRS provides for options relating to appeal and the broad categories of complaints and service requests;</del></p> <p><del>c. the third level of the IVRS provides for a sub-menu under complaints and service requests, separately;</del></p> <p>(b) the second level of the IVRS provides callers with options to select request type, specifically: for options relating to the broad categories of complaints and service requests;</p> <p>(i) ‘Complaints’,</p> <p>(ii) ‘Appeals’,</p> <p>(iii) ‘Service Request/Query’;</p> <p>(c) Subsequent to selection made at second level,</p> <p>(i) the third level of the IVRS provides for a context-specific sub-menu under complaints, appeals and service requests or queries, separately;</p> <p>(ii) the third level of any complaint,</p>	<p>1. Airtel submits that the existing complaint handling framework, including the current IVRS architecture, should be retained under this clause, as it is already robust, consumer-centric and operationally efficient.</p> <p>2. The present system enables consumers to identify the nature of their grievance at the outset, thereby ensuring routing to the appropriate resolution channel or suitably trained agent with access to the relevant tools. This design promotes effective complaint handling, minimizes misdirection and avoids unnecessary delay.</p> <p>3. Further, Airtel submits that the proposed introduction of a separate “Appeal” option at the initial stage, whether through IVRS or digital complaint interfaces, is unwarranted and may be counterproductive. An appeal is not an independent first-instance category, but a subsequent recourse available only upon dissatisfaction with the resolution of a complaint. Presenting it as a parallel option at the entry stage is likely to create consumer confusion, procedural duplication and avoidable inefficiency. The existing complaint and service request options are sufficient to capture consumer issues comprehensively, and any appeal against complaint resolution can continue to be addressed</p>	<p><b>The clause should be as below:</b></p> <p><b>Every service provider shall ensure that an Interactive Voice Response System or IVRS, if installed on a “Consumer Care Number”, is operated in the following manner:-</b></p> <p><b>(a) the first level of the IVRS provides for language selection;</b></p> <p><b>(b) the second level of the IVRS provides for options relating to appeal and the broad categories of complaints and service requests;</b></p> <p><b>(c) the third level of the IVRS provides for a sub-menu under complaints and service requests, separately;</b></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>appeal or service requests or queries sub-menu shall also contain an option to connect with a human consumer care representative.</p> <p>(iii) At the third level of IVRS, the consumer/customer should be given an option for call-back facility or wait in the queue for connecting with human consumer care representative.</p>	<p>within the same channel without requiring a distinct menu option.</p> <p>4. In the absence of any demonstrated deficiency in the current framework, introducing such changes would amount to unnecessary regulatory intervention into a functioning mechanism, without any commensurate consumer benefit.</p> <p><b>Airtel therefore submits that the current IVRS structure should be preserved in the interest of clarity, continuity, consumer convenience and effective grievance redressal.</b></p>	
	<p>11. Every service provider shall also ensure that a consumer is able to register complaints or appeals and raise requests/ queries through their web portal/ website as well as mobile application. This mechanism should have following provisions:</p> <p>(a) The first level of mechanism shall provide following options to select from:</p> <p>(i) 'Complaint',</p> <p>(ii) 'Appeal',</p> <p>(iii) 'Service Request or Query'</p> <p>(b) Subsequent to selection made at previous level,</p> <p>(i) The application will provide context-specific sub-menu under the complaints, appeals and service requests or queries,</p>	<p>Kindly refer to our comments to draft Regulation 3(10) above.</p> <p>Also, in reference to 11(d), Airtel submits that such updates are already being provided to customers through the existing operational framework, and therefore, there is no necessity to prescribe these requirements separately within the Regulations. <b>Therefore, clause 11(d) should be dropped.</b></p>	<p><b>Every service provider shall ensure that an Interactive Voice Response System or IVRS, if installed on a "Consumer Care Number", is operated in the following manner:-</b></p> <p><b>(a) the first level of the IVRS provides for language selection;</b></p> <p><b>(b) the second level of the IVRS provides for options relating to appeal and the broad categories of complaints and service requests;</b></p> <p><b>(c) the third level of the IVRS provides for a sub-menu under complaints and service requests, separately;</b></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>separately;</p> <p>(ii) In case the consumer prefers to give additional information or in absence of suitable options, the app/portal shall further provide an option for the complainant to share the details of their issue by entering text or via voice note.</p> <p>(c) The application shall also provide an option to connect with a human consumer care representative.</p> <p>(d) Consumers should receive regular updates and information regarding the status, actions taken, and projected resolution timelines for their complaints through the application interface, until final resolution, specifically but not limited to the following.</p> <p>(i) The initial update regarding the acknowledgement of service request/complaint with docket number is shared with the consumer,</p> <p>(ii) Depending on the category of complaint, the relevant information regarding expected time for resolution and information about allotment of</p>		

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>technician, if required, shall be shared with the consumer,</p> <p>(iii) In case a complaint is likely to exceed the prescribed or designated benchmark under these Regulations, the Service Provider should acknowledge the delay and inform the complainant about reason for such delay along with the revised estimated timeline for resolution.</p> <p>(iv) Once the complaint is closed, a confirmation message with survey link is shared with consumer.</p>		
	<p>12. Service Provider may at its option also enable a consumer to register complaints or appeals and raise requests/ queries through any of their new-age customer-centric solutions (Chatbots, AI Agents, etc.), either already developed or the ones that may be deployed in future, which may be available on its web portal/website or mobile application. These solutions shall follow the same provisions as mentioned above in sub regulation (10).</p>	-	No changes proposed.
	<p>13. Making ICT Accessible for Person with Disability (PwD)</p> <p>(a) Service Providers should have a special desk(s) in their Call Centres/Consumer support centres which should be manned by</p>	<p>1. Airtel respectfully submits that it already has appropriate processes and accessibility measures in place to assist Persons with Disabilities (PwDs), including accessible customer support channels and digital platforms, in line with applicable guidelines.</p>	<b>This clause should be deleted.</b>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>person(s) competent to receive calls from PwDs using assistive technologies.</p> <p>(b) The calls from PwD category subscribers shall be routed to such dedicated desk/ helpline and necessary step-by-step assistance may be provided to them.</p> <p>(c) Mobile app/website/portal should have accessibility features as per Government of India guidelines on PwD.</p>	<p>2. Under the existing PwD support framework, when a PwD customer places a call, the IVR is configured to provide direct connectivity to the call centre. At the contact centre, such calls are routed through a separate queue to facilitate identification of the customer and ensure that adequate and appropriate assistance is extended in a timely manner.</p> <p>3. In view of the above, <b>the proposed provisions are likely to result in duplication of measures already being implemented, without any corresponding incremental benefit to consumers.</b></p>	
4.	<p><b>4. Setting up of General Information Number</b></p> <p>(1) Every service provider shall, within forty-five days from the date of commencement of these regulations, establish a "General Information Number" for providing information to consumers;</p> <p><i>Provided that</i> this is not mandatory where general information is also provided on the Consumer Care Number on a toll free basis.</p> <p>(2) The Authority may, through directions, issued from time to time, specify a uniform short code for all the service providers as the "General Information Number" and every service provider who has established a separate number as</p>	-	<p>No changes proposed.</p> <p>No changes proposed.</p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>“General Information Number”, shall use such short code.</p>		
5.	<p><b>5. Publication of Information</b></p>		
	<p>(1) Every service provider shall, within forty-five days from the date of commencement of these regulations, publicise the “Consumer Care Number” and the “General Information Number”, through,-</p> <p>(a) public notice in a leading newspaper <del>in Hindi or English</del> <b>each in Hindi and English</b> and in a leading newspaper published in <del>a local language of the service area</del> <b>official language/language(s) of the state(s) in the licensed service area;</b></p> <p>(b) display on the website of the service provider, <b>as well as on the mobile application;</b></p> <p>(c) updation of SIMs of consumers by pre-configuration or over the air transfer;</p> <p>(d) display in all Complaint Centres and sales outlets; and</p> <p>(e) the telephone bills issued by the service provider.</p>	<p>1. Airtel submits that the existing print-based requirement does not effectively advance consumer outreach in the context of grievance redressal, which is inherently time-sensitive and requires immediate access to relevant contact and support information.</p> <p>2. Newspaper publication, by its very nature, is static and time-bound, and does not align with the manner in which consumers presently seek support or access service-related information. Its practical utility is further limited by inconsistent distribution in rural and remote areas, as well as the reality that a consumer facing an urgent service issue or network outage is unlikely to have access to a specific newspaper publication issued several months earlier.</p> <p>3. It is pertinent to note that consumer behaviour has, over time, decisively shifted towards digital and assisted modes of engagement, with increasing reliance on mobile applications, websites, SMS, customer care channels and other interactive interfaces that provide real-time, updated and readily accessible information.</p> <p>4. Even for elderly or rural consumers, access is more effectively facilitated through assisted or</p>	<p><b>The revised clause is as below:</b></p> <p>(1) Every service provider shall, within forty-five days from the date of commencement of these regulations, publicise the “Consumer Care Number” and the “General Information Number”, through,-</p> <p>(a) display on the website of the service provider, <b>as well as on the mobile application;</b></p> <p>(b) updation of SIMs of consumers by pre-configuration or over the air transfer;</p> <p>(c) display in all Complaint Centres and sales outlets; and the telephone bills issued by the service provider.</p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
		<p>interpersonal channels rather than independent reliance on newspaper notices.</p> <p>5. Further, complaint and information contact numbers generally remain stable and are already made available through multiple existing channels.</p> <p>6. Considering the above, <b>Airtel submits that the continued mandate for newspaper publication is outdated and of limited consumer utility, and the Authority may kindly consider permitting service providers to use more effective, accessible and contemporary modes of communication for dissemination of such information.</b></p>	
	<p>(2) Every service provider shall publicise the “Consumer Care Number” and the “General Information Number” in the same manner as given at clause (a) of sub-regulation (1) above, at least once in six months.</p>	<p>Kindly refer to our comments to draft Regulation 5(1) above.</p>	<p>This clause should be deleted.</p>
	<p>(3) In case of any change in the “Consumer Care Number” or the “General Information Number”, the same shall be publicised at least one week prior to such change, in the manner specified in sub-regulation (1).</p>	<p>-</p>	<p>No changes proposed.</p>
	<p>(4) Every service provider should have ‘Consumer Corner’ on their website, displayed in prominence on the landing page (homepage). It shall contain/highlight details mentioned below as well as statistics:</p>	<p>1. Airtel submits that the proposed requirement is unnecessary and duplicative, as the relevant details relating to the Complaint Centre and grievance redressal mechanism are already displayed on service providers’ websites under the existing regulatory framework.</p>	<p><b>We submit that this clause be deleted.</b></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<ul style="list-style-type: none"> <li>(i) Details of Complaint Center,</li> <li>(ii) Details of Appellate Authority,</li> <li>(iii) Report of Consumer Satisfaction Surveys (as described in regulation 14.A.),</li> <li>(iv) Quarterly Performance Reports (as per sub regulation (2) of regulation 15);</li> </ul>	<p>2. The service providers are already in compliance with TRAI's Direction dated 12<sup>th</sup> March 2026 mandating display of information relating to the Complaint Centre and Appellate Authority on websites and mobile applications.</p> <p>In these circumstances, prescribing an additional requirement would amount to avoidable regulatory duplication, without any demonstrated gap in consumer access or corresponding incremental benefit. <b>Airtel therefore submits that the existing framework is adequate and proposed clause should be deleted.</b></p>	
6.	<b>6. Establishment of Complaint Monitoring System</b>		
	<p>(1) Every service provider shall, within forty-five days of coming into force of these regulations, establish a <del>Web Based Complaint Monitoring System</del> 'world wide web based client server architecture or other similar architecture-based Complaint Monitoring System' to enable the consumers to monitor the status of their complaints.</p>	-	No changes proposed.
	<p>(2) Every service provider shall ---</p> <p>(a) <del>immediately on establishment of the 'Web Based Complaint Monitoring System', under sub regulation (1), publish information about the address of the 'Web Based Complaint Monitoring System' and the process for monitoring</del></p>	<p>1. Airtel submits that information relating to the Complaint Monitoring System, including the relevant URL and complaint handling procedure, is already being made available to consumers through multiple customer-friendly digital channels such as SMS, email, websites, mobile applications and assisted support interfaces.</p>	<b>We submit that this clause be deleted.</b>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p><del>the complaints in a leading newspaper in Hindi or English and in a leading newspaper in the local language of the service area and through the telephone bills issued by the service provider;</del> immediately on establishment of the 'Complaint Monitoring System', under sub-regulation (1), the service provider shall ensure that the address (URL) of the Complaint Monitoring System, along with the procedure for monitoring complaints, is published in at least one leading newspaper each in Hindi and English and in one leading newspaper in the official language/languages of the state(s) in the licensed service area. This information should be communicated to all consumers through SMS and/or email and the telephone bill issued by the service provider;</p> <p>(b) continue to make available such information in the telephone bills issued by the service provider, <del>and also publish once in six months in the newspapers in the manner prescribed in clause (a)</del> publish once in six months in the newspapers in the manner prescribed in clause (a) and send through SMS and/or email once every six months;</p>	<p>2. In today's digital ecosystem, consumers primarily rely on these platforms for timely, convenient and easily accessible information.</p> <p>3. By contrast, newspaper-based dissemination has limited practical utility, particularly given uneven reach in rural and remote areas and the fact that consumers facing service issues are unlikely to depend on or access a specific newspaper publication at the time assistance is required. Digital platforms, on the other hand, enable real-time updates, continuous availability and far more effective consumer communication.</p> <p>4. <b>Therefore, Airtel submits that mandatory newspaper publication is no longer necessary, and that digital disclosure should be considered sufficient to meet the objective of informing consumers in a more effective and consumer-centric manner.</b></p>	
(3)	<p><del>Any change in the address of the 'Web Based Complaint Monitoring System' shall also be intimated to the</del></p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p><del>consumers in the same manner as specified under sub-regulation (2).</del> Any change in the address (URL) of the 'Complaint Monitoring System' or major overhaul/comprehensive reform of the mobile application shall also be intimated to the consumers in the same manner as specified under sub-regulation (2).</p>		
	(4) The Authority may, from time to time, issue such directions as it may deem appropriate, to the service providers regarding the ' <del>Web-Based</del> Complaint Monitoring System'.	-	No changes proposed.
	(5) <del>Service Providers shall ensure that consumers receive regular updates and information regarding the status, actions taken, and projected resolution timelines for their complaints through the application interface, as well as email and SMS, until final resolution.</del>	The consumers are already kept informed about the status of their complaints, the action taken and the resolution through existing customer care channels. Accordingly, service providers should be allowed the flexibility to decide the most suitable mode and frequency of such updates in a manner that remains consumer-friendly as well as operationally efficient.	<b>We submit that this clause be deleted.</b>
7.	<b>7. Handling of complaints by Complaint Centre</b>		
	(1) Every Complaint Centre shall, immediately on receipt of a complaint from a consumer, register such complaint and allot a unique number to be called the docket number; <del>— Provided that the docket number assigned under clause (a) of sub regulation (1) of regulation 4 of the Telecom Consumers Protection and</del>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p><del>Redressal of Grievances Regulations, 2007 (3 of 2007), shall continue to be the docket number for the purpose of these regulations;</del>  <i>Provided further</i> that the Authority may, if deemed necessary, specify a format for docket number.</p>		
	<p>(2) Every service provider shall retain in the system, the details of complaints against each docket number for a minimum period of <del>three</del> <b>six (6)</b> months.</p>	<p><b>In the absence of any tangible corresponding benefit or any reason for revision of the timeline, Airtel submits that the existing timeline for record-keeping provisions be retained without change.</b></p>	<p>The existing clause should be retained, i.e.:  Every service provider shall retain in the system, the details of complaints against each docket number for a minimum period of <b>three</b> months.</p>
	<p>(3) Every Complaint Centre shall.----  (a) at the time of registering of the complaint,-                      (i) communicate, through SMS, <b>as well as email (to the registered email-id, if available)</b>, to the consumer the docket number, date and time of registration of the complaint and the time within which the complaint is likely to be resolved; and                      (ii) update the system with the date and time of registration of the complaint, docket number assigned under sub-regulation (1), the telephone number of the consumer, and the time indicated to the consumer for resolution of the complaint.</p>	<p align="center">-</p>	<p>No changes proposed.</p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>(b) on completion of action on a complaint.-</p> <p>(i) <del>communicate to the consumer, through SMS or email or post, the details of action taken on the complaint and the procedure for preferring appeal to the Appellate Authority; and</del>  communicate to the consumer, through SMS, as well as email (to the registered email-id, if available), the details of action taken on the complaint and the procedure for preferring appeal to the Appellate Authority; and</p> <p>(ii) update the system with the details of action taken.</p>		
8.	<b>8. Time limit for redressal of complaints or addressing service requests of consumers</b>		
	<p>1. <del>Every service provider shall ensure redressal of the complaints and service requests in accordance with the time frame as specified under the Quality of Service regulations issued by the Authority;</del> Every service provider shall ensure redressal of the complaints and compliance of service requests in accordance with the time frame as specified under the Quality of Service Access (Wireless &amp; Wireline) and Broadband (Wireless &amp; Wireline)</p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>Services Regulation, 2024, Telecom Commercial Communication Customer Preference Regulation, 2018 and Telecom Consumers Protection Regulations, 2012 issued by the Authority;</p>		
	<p>(2) <del>Where a time limit has not been specified under the Quality of Service regulations issued by the Authority, the complaints and service requests shall be addressed within a time period not exceeding three days.</del> Where a time limit has not been specified under the Quality of Service Access (Wireless &amp; Wireline) and Broadband (Wireless &amp; Wireline) Services Regulation, 2024, Telecom Commercial Communication Customer Preference Regulation, 2018 and Telecom Consumers Protection Regulations, 2012 issued by the Authority, the complaints and service requests shall be addressed within a time period not exceeding three days.</p>	<p>The proposed three-day residual timeline for complaints and service requests where no specific period is prescribed is unduly restrictive and operationally impractical. A uniform timeline does not reflect the varied nature, complexity, dependencies, and resolution pathways of different consumer issues. Many issues require field verification, technical checks, inter-operator coordination, customer availability, billing reconciliation, third-party inputs, or network analysis. These cannot always be conclusively resolved within three days, and a rigid timeline may lead to premature closure, repeated reopening, and poorer customer outcomes.</p> <p>Existing TRAI frameworks already prescribe timelines for identified complaint categories. Where no timeline has been specified, service providers should be allowed a reasonable, category-specific period based on the nature and complexity of the issue, rather than a blanket three-day standard.</p> <p>The objective should be accurate and durable resolution, not mere process compliance. Timelines must therefore balance promptness with practical feasibility, technical due diligence, and quality of resolution.</p>	<p>The clause should be as below:</p> <p>Where a time limit has not been specified under the Quality of Service Access (Wireless &amp; Wireline) and Broadband (Wireless &amp; Wireline) Services Regulation, 2024, Telecom Commercial Communication Customer Preference Regulation, 2018 and Telecom Consumers Protection Regulations, 2012 issued by the Authority, the complaints and service requests shall be addressed within a time period not exceeding fifteen days.</p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
		Accordingly, the proposed three-day residual timeline should be reconsidered. Where no specific timeline is prescribed, complaints and service requests may be addressed within a reasonable period, preferably seven working days.	
9.	<b>9. Appeal to Appellate Authority</b>		
	(1) Where a consumer is not satisfied with the redressal of his complaint by the Complaint Centre, or his complaint remains unaddressed or no intimation of redressal of the complaint is received within the period specified in regulation 8, such consumer may prefer an appeal to the Appellate Authority of the concerned service provider for redressal of his complaint.	-	No changes proposed.
	(2) <del>A consumer may prefer an appeal under sub-regulation (1) either directly to the Appellate Authority through email or facsimile or post or in person, or through the Consumer Care Number of the complaint centre established by the service provider.</del> A consumer may prefer an appeal under sub-regulation (1) directly to the Appellate Authority through email, mobile application, website/portal, complaint centre, or post or in person; <i>Explanation:</i> For the purpose of this sub-regulation post includes courier.	<ol style="list-style-type: none"> <li>The option of filing an appeal through “post” appears outdated and inconsistent with the broader objective of digitizing consumer grievance redressal.</li> <li>In practice, postal submissions may lead to avoidable delays, lack of real-time tracking, and uncertainty regarding receipt and processing of appeals.</li> <li><b>Given the availability of faster and more accountable digital channels such as email, mobile application, website/portal and complaint centre, we submit that the provision for appeal through post should be deleted.</b></li> </ol>	<p>The clause should be as below:</p> <p><del>A consumer may prefer an appeal under sub-regulation (1) either directly to the Appellate Authority through email or facsimile or post or in person, or through the Consumer Care Number of the complaint centre established by the service provider.</del> A consumer may prefer an appeal under sub-regulation (1) directly to the Appellate Authority through email, mobile application, website/portal, complaint centre, <del>or post</del> or in person; <i>Explanation:</i> For the purpose of this sub-regulation post includes courier.</p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>(3) Every appeal under sub-regulation (1) shall be preferred within a period of <del>thirty days</del> fifteen (15) days after expiry of the time limit specified in regulation 8;</p> <p><i>Provided that</i> the Appellate Authority may entertain an appeal after the expiry of the said period of <del>thirty days</del> fifteen (15) days but before three (3) months from the expiry of the time limit specified in regulation 8, if it is satisfied that there was sufficient cause for not filing it within that period.</p>	-	No changes proposed.
	<p>(3) No fee shall be charged from a consumer for filing an appeal before the Appellate Authority.</p>	-	No changes proposed.
10.	<b>10. Appellate Authority - Establishment and Composition</b>		
	<p>(1) Every service provider shall, within forty-five days of the commencement of these regulations, establish an Appellate Authority in each of its licensed service areas to dispose of the appeals filed under sub regulation (1) of regulation 9; Every service provider, who is granted a <del>licence</del> licence/ authorization for any service mentioned under sub regulation (3) of regulation 1, after the commencement of these regulations, shall, before providing services, establish an Appellate Authority in its service area, in each of its licensed service areas to</p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>dispose of the appeals filed under sub regulation (1) of regulation 9;</p> <p><i>Provided that a service provider, who provides different services in a licensed service area, may, at its option, establish an Appellate Authority, being common or separate, for such services being provided by it, in each license service area;</i></p> <p><del><i>— Provided further that a service provider, being only an Internet Service Provider having all India licence, may, for the purpose of these regulations, establish an Appellate Authority for any part or whole of India.</i></del> <i>“Provided further that a service provider, being only an Internet Service Provider having all India licence/ authorization, may, for the purpose of these regulations, establish one or more Appellate Authority for its service area.”;</i></p>		
	<p>(2) The Appellate Authority shall consist of one or more persons <del>as may be decided by the service provider,</del> who should be a regular employee in the senior management of the service provider with at least 5 years of experience.</p>	<p><b>Airtel submits that the composition of the Appellate Authority should be left to the discretion of the service provider, provided that the designated authority is competent, empowered and accountable for effective disposal of appeals.</b></p> <p>Mandating that such authority must comprise one or more regular employees in senior management with a minimum of five years’ experience amounts to unnecessary micro-regulation of internal</p>	<p><b>The existing clause should be retained, i.e.:</b></p> <p><b>The Appellate Authority shall consist of one or more persons as may be decided by the service provider.</b></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
		<p>organizational structures, without any demonstrated consumer benefit.</p> <p>Such prescriptive requirements are not aligned with the broader objective of ease of doing business and may unnecessarily constrain service providers in designing governance arrangements best suited to their operational models.</p> <p>The regulatory framework should therefore adopt a flexible, outcome-based approach, leaving it to TSPs to determine the appropriate composition of the Appellate Authority while ensuring effective and timely grievance redressal.</p>	
	<p>(3) <del>Every service provider shall, immediately on establishment of the Appellate Authority, publish in two leading newspapers, one in Hindi or English and the other in the local language of the service area, the details of the Appellate Authority, including the names, designation, address, fax number and e-mail address, and also arrange to display the said details in each of its offices, Complaint Centres, at its sales outlets and also on its website.</del> Every service provider shall, immediately on establishment of the Appellate Authority, publish in leading newspapers, one each in Hindi, English and the official language/language(s) of the state(s) in the licensed service area,</p>	<p>Airtel submits that the requirement for mandatory publication of Appellate Authority details in newspapers is not necessary in the present consumer environment.</p> <p>As recognized by TRAI in this consultation, modes of consumer engagement have evolved significantly, with consumers increasingly relying on digital channels such as mobile applications, websites, chat-based interfaces and assisted support mechanisms rather than print media.</p> <p>In this context, digital platforms provide consumers with real-time, updated and easily accessible information, and are better suited to ensure ongoing visibility of such details in a convenient and effective manner.</p>	<p><b>We submit that this clause be deleted.</b></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>the details of the Appellate Authority, including the names, designation, telephone number, address, and e-mail address, and also arrange to display the said details in each of its offices, Complaint Centres, at its sales outlets and also at a prominent place on its website's home page and mobile app.</p>	<p><b>Airtel therefore submits that mandatory newspaper publication is no longer proportionate or necessary, particularly when the same information can be made continuously available and updated on digital platforms and other customer touchpoints.</b> A flexible approach focused on digital disclosure would better align with prevailing consumer behavior, improve the effectiveness of communication and avoid imposing unnecessary publication requirements without corresponding consumer benefit.</p>	
	<p>(4) The service provider shall, within seven days of appointment of the Appellate Authority, intimate to the Authority, the details of the Appellate Authority.</p>	<p align="center">-</p>	<p><b>No changes proposed.</b></p>
	<p>(5) Every Service Provider shall place before its Chief Executive Officer (CEO) or the Board of Directors, as the case may be, a quarterly report on the redressal of complaints, appeals and results of online consumer survey, for review and appropriate oversight.                      Provided that such report shall, inter alia, include the number of complaints/appeals received, disposed of, pending, the time taken for disposal, and results of online consumer survey, in such format as may be specified by the Authority from time to time.</p>	<ol style="list-style-type: none"> <li>1. Airtel submits that the requirement to mandatorily place a detailed quarterly report on complaints, appeals and online consumer survey outcomes before the CEO or Board of Directors is unnecessary and unduly prescriptive, and may therefore be dispensed with.</li> <li>2. Established business governance practices already ensure that senior management remains appropriately apprised of and actively oversees consumer grievance redressal and complaint handling mechanisms through internal governance, compliance and operational review frameworks. Complaint handling and consumer service parameters are continuously monitored within existing systems, and appropriate corrective or oversight action is taken wherever required.</li> </ol>	<p><b>We submit that this clause should be deleted.</b></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
		<p>3. In this background, prescribing a specific internal reporting line to the CEO or Board through regulation would amount to excessive micro-regulation of internal corporate governance processes, without any demonstrated incremental benefit to consumers.</p> <p>4. <b>Therefore, Airtel submits that the regulatory framework should instead allow the flexibility to service providers to determine the most appropriate internal oversight and review mechanism, consistent with their governance structures.</b> Such an approach would be more aligned with sound business practice, operational efficiency and the broader objective of ease of doing business, while avoiding unnecessary regulatory intrusion into functioning internal processes.</p>	
11.	<del>11. Advisory Committee Establishment, Composition and Functions</del>		
	<p><del>(1) Every service provider shall, within forty-five days of the commencement of these regulations, establish an Advisory Committee to examine and render advice on the appeals filed before the Appellate Authority.</del></p> <p><del>(2) 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</del></p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>provider;  <del>— 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.</del></p> <p>(3) <del>The service provider shall, within seven days of the appointment of the Advisory Committee, intimate to the Authority the details of the Advisory Committee.</del></p> <p>(4) <del>The member of the Advisory Committee appointed from the consumer organisations under sub regulation (2) shall hold office for a term not exceeding one year, which may be extended for a further period of one year;</del>  <del>— Provided that such member shall not be removed before completion of his tenure, except with the prior written approval of the Authority;</del>  <del>— Provided further that the service provider seeking the approval of the Authority for removal of a member shall furnish to the Authority the reasons for such removal.</del></p> <p>(5) <del>The service provider shall pay to the member of the Advisory Committee, appointed from the consumer organisation, an honorarium of rupees two thousand per sitting of the</del></p>		

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p><del>Advisory Committee.</del></p> <p><del>(6) The Advisory Committee shall meet in such a manner that it shall render its advice on every appeal placed before it within fifteen days.</del></p> <p><del>(7) The Advisory Committee shall not receive any appeal directly.</del></p>		
12.	<b>12. Secretariat Office of Appellate Authority</b>		
	<p>(1) The service provider shall provide a <del>Secretariat and an office</del>, required supporting staff and office accommodation for the Appellate Authority to discharge its functions under these regulations.</p>	<p>1. Airtel submits that the existing framework is functioning effectively and there is no demonstrated need to mandate a separate office of the Appellate Authority. Consumer interest is adequately served so long as appeals remain accessible, are examined properly and resolved within the prescribed timelines.</p> <p>2. In this context, requiring a separate office would amount to avoidable structural prescription and micro-regulation, without any commensurate consumer benefit.</p> <p>3. <b>Airtel therefore submits that a flexible, outcome-based approach should be adopted, consistent with the broader objective of ease of doing business, while allowing service providers to continue operating the appellate mechanism through existing systems and processes.</b></p>	<b>Airtel submits that the proposed clause should be deleted.</b>
	<p><del>(2) The service provider shall appoint or designate one of its officers or employees as Secretary to Appellate Authority.</del></p>	-	No changes proposed.
13.	<b>13. Registration of Appeals and scrutiny by Advisory Committee</b>		

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p><del>(1) The Secretariat of Appellate Authority shall,---</del></p> <p><del>(a) immediately on receipt of an appeal, register it by assigning a unique appeal number;</del></p> <p><del>(b) acknowledge the appeal, within three days of its receipt, by sending the unique appeal number through SMS or e-mail to the consumer;</del></p> <p><del>(c) forward, within three days from the date of receipt of the appeal, a copy of the appeal to the service provider concerned for filing a reply, within seven days, along with the relevant information, document or record; and</del></p> <p><del>(d) within two days of receipt of the reply from the service provider place the reply, along with the appeal, before the Advisory Committee for its consideration.</del></p> <p><del>(2) The Advisory Committee shall render its advice on every appeal placed before it within fifteen days.</del></p> <p><del>(3) The Secretariat shall, within two days of receipt of the advice of Advisory Committee, place before the Appellate Authority, the appeal, the reply received from the service provider under clause (c) of sub-regulation (1) above and the advice of the Advisory Committee, for its</del></p>	<p align="center">-</p>	<p>No changes proposed.</p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<del>consideration.</del>		
14.	<b>14. Registration and Disposal of appeal by Appellate Authority</b>		
	<p><del>(1) The Appellate Authority shall ensure uniformity in the procedure for deciding appeals and shall comply with the provisions contained in sub-regulations (2).</del></p> <p><del>(2) The Appellate Authority shall, within ten days of the appeal being placed before it, conduct such inquiry as it may consider necessary and dispose of the appeal by passing a reasoned order in writing stating therein the points for determination and the decision thereon;</del>  <del>----- Provided that the Appellate Authority shall, while deciding the appeal, give due consideration to the advice given by the Advisory Committee;</del>  <del>----- Provided further that in case the Appellate Authority decides the appeal otherwise than in accordance with the advice of the Advisory Committee, it shall record the reasons for the same in the order passed by it.</del></p> <p><del>(3) The presence of the appellant shall not be obligatory, but he may, if he so desires, appear in person to present his case before the Appellate Authority.</del></p> <p><del>(4) On disposal of the appeal, the</del></p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p><del>secretariat of the Appellate Authority shall intimate the decision, through SMS or email or post, to the appellant and the service provider.</del></p>		
	<p>(1) The Office of Appellate Authority shall, --</p> <p>a) immediately on receipt of an appeal (through complaint centre, mobile application, website/portal, email, post, or by in-person), register it by assigning a unique appeal number;</p> <p>b) acknowledge the appeal, immediately on its receipt, by sending the unique appeal number through SMS and/or e-mail to the consumer;</p>	<p>1. The option of filing an appeal through “post” appears outdated and inconsistent with the broader objective of digitizing consumer grievance redressal.</p> <p>2. In practice, postal submissions may lead to avoidable delays, lack of real-time tracking, and uncertainty regarding receipt and processing of appeals.</p> <p>3. Given the availability of faster and more accountable digital channels such as email, mobile application, website/portal and complaint centre, we submit that the provision for appeal through post should be deleted.</p>	<p><b>The clause should be as below:</b></p> <p>The Office of Appellate Authority shall, --</p> <p>a) immediately on receipt of an appeal (through complaint centre, mobile application, website/portal, email, <del>post</del>, or by in-person), register it by assigning a unique appeal number;</p> <p>b) acknowledge the appeal, immediately on its receipt, by sending the unique appeal number through SMS and/or e-mail to the consumer;</p>
	<p>c) The Appellate Authority will examine as well as seek necessary details and documents from the concerned division(s) and will give the final decision and take action for resolution of the grievance within 15 days of receipt of the appeal.</p>	<p>1. Airtel submits that the existing timeline of 30 days for disposal of appeals should be continued.</p> <p>2. Appeal matters often require detailed examination of the underlying complaint, consultation with multiple concerned divisions, verification of records and supporting documents, and careful consideration of the facts and circumstances of the case before a reasoned decision can be arrived at.</p>	<p><b>The proposed clause is as below:</b></p> <p>The Appellate Authority will examine as well as seek necessary details and documents from the concerned division(s) and will give the final decision and take action for resolution of the grievance within <b>30 days</b> of receipt of the appeal.</p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
		<p>3. In this context, the existing 30-day timeline provides a balanced and practical framework that enables proper review while also safeguarding consumer interest through a defined resolution period. Reducing this timeline to 15 days may constrain the ability of the Appellate Authority to undertake a comprehensive examination in all cases, particularly in matters involving technical, operational or service-related complexities.</p> <p><b>Airtel therefore submits that retention of the current 30-day timeline would better serve the objectives of fair, effective and well-considered grievance redressal.</b></p>	
	<p>d) The action taken will be communicated within 3 days of disposal, to appellant by email and/or SMS and also be updated on the website and mobile app of the service provider, by office of Appellate Authority.</p>	-	-
	<p><b><u>14. A. Online Consumer Survey</u></b></p>		
	<p>(1) <del>Obligation to Administer Survey</del>: Upon the resolution or closure of any formal complaint/appeal, the Service Provider shall immediately administer an Online Complaint/Appeal Resolution Survey (hereinafter referred to as the "Survey") to the complainant.</p>	<p>1. Airtel submits that consumer feedback on complaint resolution is already an integral and well-established element of the existing complaint handling framework and is being effectively captured through the current operational processes.</p>	<p><b>Airtel submits that this proposal should be dropped.</b></p>
	<p>(2) The Survey shall be instantly accessible to the complainant via a dedicated,</p>	<p>2. In this context, the proposal to conduct an immediate, dedicated survey for every formal</p>	

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>secure electronic link transmitted through electronic means, such as email (if available) and SMS besides service provider's mobile application and website.</p>	<p>complaint or appeal, coupled with periodic reporting obligations, would introduce significant procedural duplication and additional compliance overhead without any proportionate enhancement in consumer protection.</p>	
	<p>(3) The Survey must collect specific, complainant-provided feedback concerning the complaint/appeal resolution in the following metric on scale of 1 to 5:                      1: Totally Dissatisfied                      2: Largely Dissatisfied                      3: Somewhat Satisfied                      4: Largely Satisfied                      5: Fully Satisfied</p>	<p>3. Airtel submits that such surveys are principally valuable as internal tools for service monitoring, operational refinement and continuous process improvement, and therefore do not require separate prescription or detailed quarterly reporting to the Authority.</p> <p>4. Further, overlaying a standalone regulatory survey requirement onto an existing feedback-enabled grievance redressal system may risk process fatigue for consumers and diversion of operational focus from substantive complaint resolution to parallel reporting compliance.</p> <p>5. <b>Therefore, Airtel submits that the existing framework already provides an effective and consumer-centric mechanism for capturing feedback on complaint handling outcomes. We request the Authority to reconsider the necessity of a separate survey requirement and allow the flexibility to operators to continue leveraging existing feedback systems in a manner that best supports timely resolution, service improvement and consumer convenience.</b></p>	
	<p>(4) The service provider shall share the detailed consumer satisfaction data, in</p>	<p>Please refer to our comments on draft Regulation 14 above.</p>	<p><b>Airtel submits that this proposal should be dropped.</b></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	respect of complaints and appeals separately, every quarter, along with Quarterly Performance Report (QPR), as described under sub-regulation (2) of regulation 15 of this regulation.		
15.	<b>15. Reporting requirements</b>		
	(1) <del>The Secretariat shall keep record of the appeals preferred, reply of the service provider, the advice of the Advisory Committee and the decisions of the Appellate Authority.</del> The Appellate Authority shall keep record of the preferred appeals, relevant details and documents collected from concerned division/ department of the service provider, the decisions and the action taken for the resolution dispute by the Appellate Authority, for at least one year after disposal of the appeal.	Once the appeal has been resolved and the relevant escalation period has lapsed, continued retention does not enhance redressal or improve consumer outcomes. The retention period should therefore be left to the discretion of TSPs.	The clause should be revised as below:  <del>The Secretariat shall keep record of the appeals preferred, reply of the service provider, the advice of the Advisory Committee and the decisions of the Appellate Authority.</del> The Appellate Authority shall keep record of the preferred appeals, relevant details and documents collected from concerned division/ department of the service provider, the decisions and the action taken for the resolution dispute by the Appellate Authority, <del>for at least one year after disposal of the appeal.</del>
	(2) <del>Every service provider shall submit to the Authority and also place on its website, by the 15th of the month succeeding every quarter, a report mentioning therein —</del> (a) <del>the number of appeals received;</del> (b) <del>number of appeals disposed of;</del> (c) <del>number of appeals pending; and</del> (d) <del>such other particulars, as may be required by the Authority.</del> Every service provider shall submit to the Authority as well as publish the same on	1. Airtel submits that the objective of any reporting framework should be to strengthen consumer outcomes in a manner that is practical, proportionate and conducive to efficient service delivery.  2. In this regard, the proposed highly detailed KPI-based reporting requirements may impose significant operational and compliance burden on service providers without delivering commensurate benefit to consumers. We already internally monitor a wide range of complaint-	<b>We submit that this clause should be deleted.</b>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>their <del>own</del> website/portal/app, on quarterly basis, a comprehensive performance report separately for Complaints and Appeals for each LSA separately, within fifteen (15) days from the end of each quarter; The report shall include, but not be limited to, the following:</p> <p>(a) Key Performance Indicators (KPIs) for Complaints:</p> <ol style="list-style-type: none"> <li>i. Number of Complaints pending and brought forward from last quarter,</li> <li>ii. Number of Complaints received during the quarter,</li> <li>iii. Number of Complaints disposed off during the quarter,</li> <li>iv. Number of Complaints pending at the end of the quarter,</li> <li>v. Complaints Redressed Within the time limit,</li> <li>vi. Complaints redressed beyond the time limit,</li> <li>vii. Average Resolution time,</li> <li>viii. Percentages of the complaint resolved to the full satisfaction of the consumer,</li> <li>ix. Percentage of total complaints resolved,</li> <li>x. Survey results for Complaints to be shared for following</li> </ol>	<p>handling and service-quality parameters on a continuous basis to ensure effective grievance management, timely corrective action and ongoing service improvement.</p> <p>3. Accordingly, mandating additional granular reporting on complaints, appeals and survey-related metrics may result in duplication of effort rather than incremental consumer value. Airtel further submits that publication and reporting of highly disaggregated data, without the full operational context in which such complaints arise, may not necessarily yield meaningful regulatory insight and may instead create scope for incomplete or distorted interpretation of consumer grievance patterns. Complaint volumes and ratings, particularly in location-specific or technically constrained scenarios, do not always reflect service provider responsiveness alone and may be influenced by factors beyond the immediate control of the TSP. In such cases, excessive public emphasis on raw granular metrics may inadvertently encourage repetitive complaint behaviour, increase avoidable pressure on grievance channels and divert resources away from substantive issue resolution.</p> <p>4. Therefore, the proposed additional requirements appear disproportionate to the likely benefit and would introduce avoidable complexity, compliance overhead and process duplication.</p>	

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>indicators:</p> <ol style="list-style-type: none"> <li>1. Total count of consumers participated in survey,</li> <li>2. Total Count of Customers, who gave a rating of 1,</li> <li>3. Total Count of Customers, who gave a rating of 2,</li> <li>4. Total Count of Customers, who gave a rating of 3,</li> <li>5. Total Count of Customers, who gave a rating of 4,</li> <li>6. Total Count of Customers, who gave a rating of 5;</li> </ol> <p>(b) Key Performance Indicators (KPIs) for Appeals:</p> <ol style="list-style-type: none"> <li>i. Number of Appeals pending and brought forward from last quarter,</li> <li>ii. Number of Appeals received during the quarter,</li> <li>iii. Number of Appeals disposed off during the quarter,</li> <li>iv. Number of Appeals pending at the end of the quarter</li> <li>v. Appeals Redressed Within the time limit,</li> <li>vi. Appeals Redressed beyond the limit,</li> <li>vii. Average Resolution time,</li> <li>viii. Survey results for Appeals to be</li> </ol>	<p>5. <b>Airtel submits that a light-touch, outcomes-oriented regulatory approach would better advance consumer interest by allowing service providers to focus resources on actual complaint resolution and service improvement, while also remaining aligned with the broader policy objective of promoting ease of doing business in the sector.</b></p>	

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>shared for following indicators:</p> <ol style="list-style-type: none"> <li>1. Total count of consumers participated in survey,</li> <li>2. Total Count of Customers, who gave a rating of 1,</li> <li>3. Total Count of Customers, who gave a rating of 2,</li> <li>4. Total Count of Customers, who gave a rating of 3,</li> <li>5. Total Count of Customers, who gave a rating of 4,</li> <li>6. Total Count of Customers, who gave a rating of 5;</li> </ol> <p>(c) Every Service Provider shall submit to the Authority, on a half-yearly basis, a compliance report certifying that the provisions relating to publicity of the Customer Care Number, General Information Number (GIN), and other information as specified under sub-regulation (2) of regulation 5, have been duly complied with.</p> <p>Provided that such report shall be furnished within fifteen (15) days from the end of each half-year, in such format and manner as may be specified by the Authority from time to time, along with documentary</p>		

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>evidence of such publicity.</p> <p>(d) The Authority may from time to time amend or change the reporting requirements, as necessary.</p> <p>(e) Every service provider shall create or upgrade their system within six months of notification of these regulations for collection of primary data, its storage, processing, performance report generation and their online submission to the Authority, in respect of each parameters specified under regulation 15 (2) in such manner and format, at such intervals and within such time limit as may be specified by the Authority, from time to time, by an order or direction.</p>		
	<p>(3) The authority may, if it deems necessary, publish the report submitted to it under sub-regulation (2) and also place the same on its website.</p>	-	No changes proposed.
16.	<p><b>16. Complaints referred to service providers by Authority</b></p>		
	<p>(1) The Authority may, without prejudice to the provisions contained in the Telecom Regulatory Authority of India Act, 1997 (24 of 1997), refer to a service provider, for the purpose of redressal,-</p> <p>(a) complaints alleging violation of the</p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>Act or regulations made there under or directions issued or orders made by it under the Act;</p> <p>(b) complaints of the consumers that are generic in nature;</p> <p>(c) complaints alleging that a practices adopted by the service providers adversely affects the interest of the consumers;</p> <p>(d) a complaint of such nature that, in the opinion of the Authority, is required to be resolved expeditiously by the service provider.</p>		
	<p>(2) Every service provider shall investigate and find out the root cause of all complaints referred by the Authority under clauses (a), (b) and (c) of sub-regulation (1) and redress such complaints, under information to the consumers as well as the Authority of the result within one month from the date of reference of the complaint.</p>	-	No changes proposed.
	<p>(3) Every service provider shall resolve every complaint referred to under clause (d) of sub regulation (1) within seven days of reference of the complaint, and inform the result to the consumers as well as the Authority within three days of the resolution of the complaint.</p>	-	No changes proposed.
	<p>(4) In case the investigation and root cause of the complaints referred to under sub-</p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>regulation (2) reveal general deficiency or systemic inadequacy in practice or procedure or operation adopted by or on the part of the service provider, the service provider shall take remedial measures in respect of all similarly placed consumers and intimate the same to the Authority within one month of reference of the complaint.</p>		
17.	<b>17. Telecom Consumers Charter</b>		
	<p>(1) Every Service provider shall within sixty days of the coming into force of these regulations, publish a 'Telecom Consumers Charter' containing the following information:-</p> <ul style="list-style-type: none"> <li>(a) name and address of the service provider;</li> <li>(b) services offered by the service provider, including the details of geographic areas where such services are available;</li> <li>(c) terms and conditions of service offered by the service provider;</li> <li>(d) Quality of Service parameters specified by the Authority in respect of each of the services;</li> <li>(e) Quality of Service promised by the service provider in respect of each service and geographic area;</li> <li>(f) details about equipment offered to the consumer by the service provider in</li> </ul>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>respect of any of the services;</p> <p>(g) <del>right of consumers under the different regulations, orders and directions issued by the Authority; and in particular those relating to Tariff, Mobile Number Portability, Telecom Commercial Communications Customer Preference Regulations, 2010 (TCCCPR) and Value Added Services (VAS);</del> rights of consumers under the different regulations, orders and directions issued by the Authority; and in particular those relating to Tariff, Mobile Number Portability, Telcom Consumers Protection Regulation, 2012 (TCPR), Telecom Commercial Communications Customer Preference Regulations, 2018 (TCCCPR), and Quality of Service Access (Wireless &amp; Wireline) and Broadband (Wireless &amp; Wireline) Services Regulation, 2024 ;</p> <p>(h) the duties and obligations of the service provider under the different regulations, orders and directions issued by the Authority; and in particular those relating to Tariff, Mobile Number Portability, TCCCPR, and VAS;</p> <p>(ha) procedure for termination or disconnection of each service plus</p>		

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>value added services offered by the service provider; and</p> <p>(i) General Information Number;</p> <p>(j) Consumer Care Number;</p> <p>(k) complaint redressal mechanism, including complaint redressal procedure and the time limits for redressal of complaints;</p> <p>(l) Name, designation, e-mail, contact address, telephone number and facsimile number of the Appellate Authority and time limits for disposal of appeals;</p> <p>(m) <del>procedure for termination or disconnection of each service plus value added and bundled services offered by the service provider; and</del></p> <p>(n) any other information that may be specified by the Authority from time to time.</p>		
	<p>(2) The 'Telecom Consumers Charter' shall be prepared in Hindi, English and the <del>local language of each service area</del> official language/ languages of the state(s) in the licensed service area.</p>	-	No changes proposed.
	<p>(3) The 'Telecom Consumers Charter' shall be available for reference at every office of the service provider, Complaint Centre, at the sales outlets and on the website of the service provider and also accessible via mobile app.</p>	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>(4) A copy of the 'Telecom Consumers Charter' or its abridged version containing salient features such as terms and conditions of service, the Consumer Care Number, the General Information Number, contact details of Complaint Centre and the Appellate Authority, procedure and time limit for redressal of complaints and disposal of appeals shall be provided by the service provider to each consumer at the time of subscription for service.</p>	-	No changes proposed.
	<p>(5) A copy of the 'Telecom Consumers Charter' shall be filed with the Authority within sixty days from the date of commencement of these regulations:</p> <p><i>Provided that</i> a service provider, who has been granted a <del>licence</del> <i>licence/ authorization</i> after the commencement of these regulations, shall file with the Authority, before commencement of service, a copy of 'Telecom Consumers Charter'.</p>	-	No changes proposed.
	<p>(6) The service provider shall file with the Authority, by 15th January of every year, a fresh copy of the 'Telecom Consumers Charter' incorporating all changes effected.</p>	-	No changes proposed.
18.	<b>18. Inspection and Auditing</b>		
	<p>(1) Every service provider shall maintain complete and accurate records of</p>	<p>Once the appeal has been resolved and the relevant escalation period has lapsed, continued retention</p>	<b>The existing clause should be retained, i.e.</b>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	redressal of complaints by its Complaint Centre and the Appellate Authority, <b>for at least one year after disposal of the complaint/appeal as the case may be.</b>	does not enhance redressal or improve consumer outcomes. The retention period should therefore be aligned with regulation 7(2) above. Also, there is no clear consumer benefit in mandating a one-year retention period after disposal of an appeal.	<b>Every service provider shall maintain complete and accurate records of redressal of complaints by its Complaint Centre and the Appellate Authority.</b>
	<p>(2) The Authority may, if it considers it expedient so to do, and to ensure compliance of the provisions of these regulations, in exercise of power conferred by section 12, of the Telecom Regulatory Authority of India Act, 1997 (24 of 1997), by order in writing, direct any of its officers or employees or an independent agency appointed by the Authority, to ----</p> <p>(a) inspect the Complaint Centre and the Secretariat the Complaint Centre, Complaint Monitoring System, Grievance Redressal Mechanism, and the related instrumentalities including the Office of the Appellate Authority and the records maintained under sub-regulation (1); or,</p> <p>(b) get the records maintained under sub-regulation (1) audited.</p>	-	No changes proposed.
	<b>18.A. Regulatory Review</b>		
	(1) <b>The authority may conduct periodic regulatory review of the redressal of complaints and appeals by the service</b>	1. The proposed Regulation 18.A should not be introduced. In our view, consumer interest is best served through a simple, responsive and customer-	<b>We submit that this clause should be deleted.</b>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>providers in the following manner:</p> <ul style="list-style-type: none"> <li>a. Auditing and/or Inspection as described under regulation 18;</li> <li>b. Audit/Analysis of Quarterly Performance Reports submitted;</li> <li>c. Review based on Consumer Feedback gathered via multiple channels;</li> </ul>	<p>friendly complaint redressal system, and not through a penalty-based approach.</p> <p>2. It is pertinent to note that excessive regulation and financial disincentives do not always improve consumer outcomes. Instead, they can make the system rigid and reduce the flexibility needed to resolve complaints effectively.</p>	
	<p>(2) The Authority may establish a mechanism to seek reports from the Service Providers on consumer feedback received via various channels.</p>	<p>3. In the telecom sector, the biggest financial disincentive for a TSP is already the risk of losing customers and suffering reputational harm. Therefore, the Authority should focus on improving customer convenience and ease of resolution rather than imposing additional penalties.</p>	
	<p>(3) Service Provider shall provide all data as requested by TRAI for the purpose of periodic Regulatory Review through manual/online mechanism as prescribed by the authority.</p>	<p>4. We further submit that the terms such as "improper dismissal" and "unsatisfactory disposal" are broad and subjective. Complaint handling often depends on the facts of each case and may involve technical verification and operational limitations. Many complaints, especially those relating to network issues, may arise due to factors beyond the direct control of the TSP. In such cases, imposing financial disincentives based on subjective assessment would be unfair and disproportionate. Penalties should not be imposed where there is no clear negligence or proven harm to the consumer.</p>	
	<p>(4) If during such audit, inspection, analysis or review, the Authority finds that a complaint/appeal was dismissed improperly or disposed of unsatisfactorily, the service provider shall be liable for financial disincentive of</p> <ul style="list-style-type: none"> <li>a. Rupees One thousand only (Rs. 1000/-) per improper dismissal/disposal of complaint by service provider, and /or</li> <li>b. Rupees Five thousand only (Rs. 5000/-) per improper</li> </ul>		

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>dismissal/disposal of appeal by service provider,</p> <p>Provided that the maximum amount of financial disincentive payable by a service provider shall not exceed rupees fifty lakhs per quarter for the licensed/authorized service area.</p> <p>Provided further that no order for payment of any amount by way of financial disincentive shall be made by the Authority unless the service provider has been given a reasonable opportunity of representation against the contravention of the regulation observed by the authority;</p>	<p>5. Further, a penalty of ₹1,000 per complaint and ₹5,000 per appeal can create a financial exposure based only on a later audit view, and not on actual proof of harm or negligence. This may lead to unnecessary compliance burden and defensive practices, instead of better consumer service.</p> <p><b>In view of the above, this regulation should be deleted.</b></p>	
	<p><b>18. B. Violation of Compliances</b></p>	<p>1. We submit that Regulation 18. B should also not be adopted. This provision appears to introduce a rigid enforcement mechanism through default-based financial consequences. Such an approach is not in line with a practical and customer-focused complaint redressal framework. Complaint resolution in the telecom sector is often dependent on technical and operational factors. A rigid penalty system may shift the focus from actual resolution to procedural compliance.</p>	<p><b>We submit that this clause should be deleted.</b></p>
	<p>(1) If a service provider fails to meet the deadline of submitting the Quarterly Performance Report (QPR), it shall be liable to pay an amount, by way of financial disincentive, not exceeding rupees five thousand (Rs. 5000/-) per report for everyday, during which the default continues, for first fifteen (15) days and thereafter rupees twenty thousand (Rs. 20,000/-) per report per day, subject to maximum amount of rupees ten lakhs (Rs. 10 lakhs) per instance, as the Authority may, by order,</p>	<p>2. We also submit that this regulation increases the concerns arising from Regulation 18.A by creating continuing financial exposure based on audit</p>	

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	<p>direct.</p> <p>Provided that no order for payment of any amount by way of financial disincentive shall be made by the Authority unless the service provider has been given a reasonable opportunity of representing against the contravention of the regulation observed by the authority;</p>	<p>findings rather than proven consumer harm or wilful default. This would make the complaint redressal framework overly punitive. A customer-centric system should encourage timely resolution and process improvement, not repeated financial penalties based on subjective review.</p> <p>3. Further, this regulation may result in duplication of penalties. Many customer-related issues are already covered under the existing QoS and other regulatory frameworks. If financial consequences are imposed again under the complaint redressal mechanism for the same issues, it may amount to double jeopardy. This would be unfair and inconsistent with sound regulatory practice.</p> <p>4. We reiterate that no service provider has any business interest in ignoring consumer complaints. In a highly competitive market, loss of a paying customer is itself the strongest financial disincentive. <b>Therefore, there is no need to introduce additional harsh penalty provisions of this nature.</b></p>	
	<p><b>18.C. Consequences for failure of Service Provider to pay Financial Disincentive</b></p>	<p>Please refer to our comments to regulation 18.A above.</p>	<p><b>We submit that this clause should be deleted.</b></p>
	<p>(1) If a service provider fails to make payment of financial disincentive under sub-regulation 18.A.(4) or 18.B.(1) within a period of twenty one (21) days from the date of issue of order for payment of financial disincentive, it shall</p>	<p>Please refer to our comments to regulation 18.A above.</p>	<p><b>We submit that this clause should be deleted.</b></p>

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
	be liable to pay simple interest on the outstanding amount of financial disincensive, at a rate which will be two percent (2%) above the one year Marginal Cost of Lending Rate (MCLR) of State Bank of India applicable as on the beginning of the Financial Year (namely 1st April) in which last day of the stipulated period falls.		
	(2) For the purposes of this regulation, a part of month shall be reckoned as full month for the purpose of calculation of interest, and a month shall be reckoned as an English calendar month.	Please refer to our comments to regulation 18.A above.	<b>We submit that this clause should be deleted.</b>
	<b>18. D. The amount payable by way of financial disincensive under these regulations shall be remitted to such head of account as may be specified by the Authority.</b>	Please refer to our comments to regulation 18.A above.	<b>We submit that this clause should be deleted.</b>
19.	<b>19. Application of other laws not barred</b>	-	No changes proposed.
	The provisions of these regulations shall be in addition to, and not in derogation of, any other law for the time being in force.	-	No changes proposed.
20.	<b>20. Reckoning of time limit for the purposes of these regulations</b>	-	No changes proposed.
	The time limit or the period specified under these regulations, for redressal of complaints or disposal of appeals, shall exclude the day of making such complaint or preferring an appeal, as the case may be.	-	No changes proposed.

**Airtel's Comments to TRAI's Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026**

Sr. No.	Draft Regulation	Comments / Justification	Proposed Regulation
21.	<b>21. These regulations not to apply in certain cases</b>	-	No changes proposed.
	(1) Nothing contained in these regulations shall apply to any matter or issue for which-- (a) any proceedings before any court or tribunal are pending; or (b) a decree, award or an order has already been passed by any competent court or tribunal or authority or forum or commission, as the case may be.	-	No changes proposed.
22.	<b>22. Repeal and saving</b>	-	No changes proposed.
	(1) The Telecom Consumers Protection and Redressal of Grievances Regulations, 2007 (3 of 2007) is hereby repealed.	-	No changes proposed.
	(2) Notwithstanding such repeal, anything done or any action taken under the said regulations shall be deemed to have been done or taken under the corresponding provisions of these regulations.	-	No changes proposed.
23.	<b>23. Interpretation</b>	-	No changes proposed.
	In case of any doubt regarding interpretation of any of the provisions of these regulations, the clarification by the Authority shall be final and binding.	-	No changes proposed.

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