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18th June 2026

To,

Shri Vivek Khare
Advisor (CA), TRAI
TRAI, New Delhi

Sir,

**Subject:- DRAFT NOTIFICATION Telecom Consumers Complaint Redressal
(Fourth Amendment) Regulation, 2026**

We are a registered CAG of TRAI for the state of Karnataka.

We are pleased to attach our **counter comments** on the submissions made by other stakeholders on the above consultation paper.

Thanking you,
Yours Sincerely

GOPAL RATNAM V
Secretary
Consumer Care Society

Counter Comments on
Draft Notification
Telecom Consumers Complaint Redressal
(Fourth Amendment) Regulation, 2026

A. Sub Regulation (1) of Regulation (3) - Language Support in Complaint Centres.

The TSPs are against the addition of languages in the complaint centres.

Vodafone Idea (VIL)

"The volume of calls at our IVR is heavily concentrated over five languages thus, driving 85% of daily traffic... Expanding IVR support to these low-volume languages presents significant challenges. It requires substantial one-time and ongoing operational costs, increases implementation effort, and risks degrading overall IVR performance..."

"Therefore, we request the Authority to drop the changes related to the additional languages proposed in the draft Regulation."

Airtel

"Allowing TSPs to determine language offerings based on actual demand, usage patterns, and operational feasibility ensures optimal resource utilization and effective service delivery."

"A 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."

While the other channels of email, App, website etc can be accessed by the traditional literate and digital literate subscribers, voice based complaint centre is the ONLY channel available for the traditionally illiterate and digital illiterate subscribers, many of whom would be from poor families and rural areas. The consumer's right to grievance redressal should not be denied because of language issues and should not be considered on financial grounds alone.

Hence we strongly recommend the inclusion of this amendment so that consumers speaking different languages are able to access the TSPs for registering complaints.

B. Sub Regulation (3) of Regulation (3). Extension of the call centres timings to round the clock (24 hours)

The TSPs are not in favour of this change.

VIL

"Imposing mandatory round-the-clock live human agent support would result in significant operational and cost implications, without delivering commensurate consumer benefit."

Airtel

"The existing framework is adequate, consumer-centric, and aligned with established industry practice."

"Consumers already have 24x7 access through digital and automated channels."

"The existing provision should be retained."

CCS believes that in the addition to the earlier reason that traditional illiterate and digital illiterate customers would need the voice based channel for their grievances, the telecommunication service support should be available throughout as economic activities are happening around the clock.

Further Fraud, SIM hijacking and other emergency situations need immediate and definitely human intervention. Hence this amendment should be retained.

C. Sub-regulation (9) of Regulation 3. New IVRS Process Flow.

The Clauses (b) and (c) are objected by the TSPs. Their comments are as follows,

Reliance Jio (RJIL)

"No Need to disturb IVR flow."

"The current IVR flow is built based on extensive customer feedback and experience..."

"The consumers are used to a flow of IVR and may not be aware of the difference in appeal/query/complaint..."

"Giving this option at the very initial stage may lead many customers to opt for appeal without an underlying complaint."

Airtel

"The draft provisions on IVRS design merit careful reconsideration..."

"A hierarchical, menu-driven IVR... should not be treated as the default or mandatory architecture."

CCS feels that there is a need for a hierarchical menu-driven IVR as it would enable faster handling of the subscribers issues. The analysis of the IVRS of TSPs reveal that there are multi-level and reaching an actual human is difficult. The TSPs also tend to

use the IVRS for other purposes like Promotions, Announcements, causing time delays and confusion. Moreover the choice options are different for each TSPs and these keep changing every few months. Hence there is a need for a standardised IVR design.

However there is merit in the objections of the TSP regarding the labelling of categories. We suggest that careful consideration and testing be done on the labelling of categories (appeal/query/complaint).

CCS suggest 2 modifications to this amendment to make it more customer friendly.

1. That at the second level there be an additional choice (iv) Not Sure/others. This choice would automatically result in a call back or a human contact.

2. That the Categories at third level also be enumerated and standardised across the industry so that customer will be easily accustomed to the IVRS.

D. AI customer support Agents

An important proposal made by a TSP is combining automation with a mandatory human fallback.

VIL

"Considering the rapid evolution of customer interaction technologies, it is submitted that the provision under Regulation 9 (c)(iii) and 10(c), should be made technology-neutral by allowing both human representatives as well as AI-powered (Agentic AI) customer support agents, to provide support to the consumers"

CCS welcomes this suggestion and urges the regulator to consider it. This proposal would also partly address the TSPs cost objections to some other changes mentioned earlier by reducing the cost of changes in the grievance redressal process.

E. Regulation 14.A. Online Consumer Survey

This path setting initiative by TRAI has met with opposition from the TSPs. These are some comments expressed by them on this issue.

Airtel

"Survey outcomes are also inherently variable and may not reliably reflect resolution quality..."

"Airtel requests the Authority to drop the proposed standalone survey requirement..."

RJIL

"This requirement is legally invalid."

"Survey methodologies of different service providers will always be different..."

"If it so desires then it can appoint a third-party agency to carry out the survey for all TSPs."

The Survey will provide a fast and accurate picture of the customers' satisfaction levels of the complaints redressal systems of the TSPs and should be introduced. In fact there are 3 major benefits of the survey.

1. It is an important consumer feedback mechanism for the TSPs and the regulator
2. It is a significant criteria for the consumer in choice of TSPs
3. It brings accountability among the Service Providers

F. Sub Regulation (4) of Regulation 18A. Regulatory Review

The Regulator has proposed financial disincentives for improper complaint handling found during the regulatory review. This proposal has been strongly opposed by the TSPs.

RJIL

"Financial Disincentives (FDs) are not legally tenable..."

"FDs will only lead to the same being treated as cost of doing business."

"'Improper dismissal' or 'unsatisfactory disposal' are highly contextual or subjective."

"Accordingly, we request the Authority to not implement any FDs in the Regulations."

VIL

"'Unsatisfactory disposal' is inherently subjective and may give rise to ambiguity."

"The consumer may still remain dissatisfied with the outcome."

"The quantum of financial disincentive may be reviewed and rationalized."

Airtel

"Penalties should not be imposed where there is no clear negligence or proven harm to the consumer."

"₹1,000 per complaint and ₹5,000 per appeal can create a financial exposure based only on a later audit view."

"This regulation should be deleted."

Tata Tele Services

"The proposed financial disincentive structure and high monetary ceilings appear disproportionate..."

"Telcos already remain subject to extensive regulatory reporting and compliance obligations."

All operators strongly oppose penalties. The some of the objections are

1. Subjectivity of "unsatisfactory disposal".
2. Regulatory overreach.
3. Compliance burden.

4. Financial exposure.

CCS strongly urges the regulator to retain this recommendation. Our experience as a member of the Appellate Advisory Committee (AAC) with all the TSPs has been that poor grievance redressal practices have continued because there has been no consequences for the TSPs for such practices.

There is however merit in the TSPs concern on the subjective phrase “Disposed of unsatisfactorily”. So failures or the actions on which penalties should be levied should be more objective to ensure that there is clarity and does not lead to confusion and conflict. Some of the possible failures could be

- refusal to register complaint,
- missed timelines,
- failure to communicate outcome,
- appeal process violations.

G. Sub-regulations 2(a) and 2(b) of Regulation 9. Complaint Monitoring System.

The TSPs while generally supportive of this regulation, they have opposed the publication in newspapers.

Airtel

"Newspaper-based dissemination has limited practical utility."

"Digital platforms enable real-time updates, continuous availability and far more effective consumer communication."

"Mandatory newspaper publication is no longer necessary."

RJIL

"Printed newspapers are no longer a primary source of information."

"This newspaper publishing does not benefit any category of customers and is being continued as a legacy practice."

CCS is inclined to agree with the TSPs on this issue. Digital disclosure is likely more effective than mandatory newspaper advertisements. However, we propose an alternate approach, with the newspapers being used for an year and then discontinued. Basically the regulation has a sunset clause.

H. Implementation Timelines.

The TSPs have sought extended time to implement the modifications made by this regulation. TRAI has provided 30 days for the date of the publication of this regulation in the official gazette under clause 1 (c).

VIL

"Therefore, in consideration to the breadth and complexity of regulatory and technical requirements as proposed under the Draft Regulations, we

strongly urge the Authority to provide adequate and realistic timelines for implementation, which would not be less than 2 to 3 quarters from the date of issuance of amendment to the Regulation."

"Even If the Authority prescribes the timelines for implementation, there should be a provision for these timelines to be suitably re-prescribed after a thorough assessment by TSP(s) as well as through collaboration and engagement with TRAI."

Airtel

"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."

"Accordingly, Airtel requests that the Regulation be brought into force only after a minimum period of six months from the date of its notification."

We believe that the submission of the TSPs has substance. Some of the amendments being introduced under the regulations do need time for them to be implemented as they require fairly substantial changes like CRM modification, IVR design, Backend Software changes, Staff training and Vendor Integration.

We suggest that rather than a single implementation date, TRAI should adopt a phased approach depending on the complexity of the implementation. We would group the amendments into 3 categories of 30 days, 60 to 90 days and 120 to 180 days. The TSPs could be asked to indicate the category into which the a particular amendment would be fall and get their buy-in. We have listed some of our suggestions below. Such an approach would ensure that these changes are well tested and the transition happens with minimum disruption at the consumer end. Further, if short time notice is insisted, the roll out could cause problems and the TSPs would ask for extensions then.

Phase 1 (30 days)

- Complaint acknowledgements
- Appeal disclosures
- Website/app disclosures
- Reporting formats
- Survey framework
- Record retention
- Compliance officer designation

Phase II (60 - 90 days)

- AI escalation rules
- New complaint tracking requirements

Financial disincentive framework
Phase III (120 - 180 days)
IVRS redesign
Human escalation architecture
New multilingual IVR capabilities
Full state-language support
Large-scale call-centre modifications

I. Exclusions and Relaxations in the resolutions of Complaints.

There are many Exclusions and limitations in certain complaint handling obligations sought by the TSPs in their submission.

1. Factors outside the TSP's Control

AIRTEL

"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."

We do agree with this argument given the telecom eco-system and architecture. However this cannot be a blanket excuse for closure and hence it necessary for TRAI to stipulate in the regulation that customer complaints should be investigated, the root cause/s be identified and this has to clearly communicated to the consumer before the closure of such complaints.

2. Exemption from 3-day Resolution requirement

AIRTEL

"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."

"The objective should be accurate and durable resolution, not mere process compliance"

This suggestion is reasonable as there would be practical difficulties in the resolution of a complaint. Hence a modified form of time limit is suggested.

The default time period for the complaint resolution would be 3 days. In case of complex complaints, the consumer should be informed of this and the tentative time period should be mentioned. However in no case should the time limit would be more 7 days.

3. Exemptions from Additional Accessibility Obligations for PwDs

Airtel

"Airtel respectfully submits that it already has appropriate processes and accessibility measures in place to assist Persons with Disabilities (PwDs)."

RJIL

"Reliance Jio Infocomm Limited has already deployed appropriate processes and accessibility measures in place for assisting Persons with Disabilities (PwDs)."

"The proposed provisions may lead to duplication of existing practices already being implemented by service providers and should be dropped."

The responses provided by the TSPs is confounding. If there are processes and measures already in operation and they meet the accessibility requirements, then there should be NO problem. Hence the need to delete this obligation does not arise and so we suggest that this measure be retained.

GOPAL RATNAM V
Secretary
Consumer Care Society