



## COAI Response to TRAI’s “Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026”

---

### Preamble

- I. We thank the Authority for providing us the opportunity to respond to TRAI Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulation, 2026. We acknowledge and support the Authority’s objective of strengthening consumer grievance redressal mechanisms and enhancing consumer experience through greater transparency, accessibility, and responsiveness in complaint handling systems.
- II. The telecommunications sector plays a critical role in empowering consumers through digital connectivity, which drives economic growth, social inclusion, and access to essential digital services. In this context, an effective and consumer-friendly complaint redressal framework is equally important to ensure consumer confidence, service accountability, and trust in the digital communications ecosystem.
- III. At the outset, we respectfully submit that the telecom industry remains fully committed to ensuring timely, effective, and consumer-centric grievance redressal. Telcos have, over the years, established robust complaint management frameworks supported by multi-channel customer care systems, digital interfaces, complaint monitoring mechanisms, and technology-enabled service support aimed at addressing consumer concerns efficiently.
- IV. We respectfully submit that certain proposed provisions require reconsideration to ensure that the regulatory framework remains balanced, proportionate, and operationally implementable. In several instances, the proposed measures appear to duplicate practices already being undertaken by service providers or introduce prescriptive requirements that may result in avoidable operational complexity, increased compliance burden, and disproportionate costs without commensurate consumer benefit.
- V. We further submit that the regulatory framework may continue to be guided by principles of technological neutrality, operational flexibility, and outcome-based compliance, particularly in areas where service providers are already adopting digital-first grievance redressal mechanisms, accessibility measures, multilingual support, consumer feedback systems, and proactive communication tools.
- VI. Additionally, as the sector transitions under the framework of the Telecommunications Act, 2023, it is important that any amendments preserve regulatory certainty, avoid overlapping obligations, and remain aligned with the broader objective of ease of doing business and facilitative regulation.



- VII. We respectfully submit that, prior to finalising the proposed amendments, **the Authority may kindly consider undertaking a comprehensive cost-benefit analysis.** Such an analysis would help assess the incremental financial and operational impact of the proposed provisions on service providers, especially where existing complaint mechanisms already achieve similar outcomes. It would also enable a transparent evaluation of whether the anticipated consumer benefits—such as marginal improvements in redressal timelines or accessibility—justify the additional compliance costs, infrastructural changes, and administrative overheads.
- VIII. A **structured cost-benefit assessment would further align the regulatory process with the principles of proportionality, evidence-based policymaking, and least burdensome intervention,** as envisaged under the Telecommunications Act, 2023. This would ensure that the final regulation delivers meaningful consumer empowerment without imposing avoidable inefficiencies on the telecom ecosystem.
- IX. We further respectfully request that, in the spirit of collaborative regulation, **the revised draft of the proposed amendment based on the comments submitted by all the stakeholders may kindly be shared with the industry for comments before finalisation.** This would provide service providers with a meaningful opportunity to examine modifications made in response to initial feedback, assess their operational implications, and offer constructive inputs to ensure that the final regulation is clear, implementable, and aligned with the shared objective of consumer protection.

#### 1. **Evolution of the Telecommunications Ecosystem**

- a) The Draft Telecommunication Consumers Complaint Redressal Regulations, 2026 seek to modernise the consumer grievance redressal framework in view of the substantial transformation of the telecommunications ecosystem since the earlier framework introduced in 2012.
- b) The sector has evolved from a predominantly 2G/3G voice-centric environment to an integrated digital communications ecosystem driven by 4G and 5G technologies, smartphones, app-based communication platforms, mobile applications and data-intensive services.
- c) Consumer experience today depends not only upon the quality of telecom networks, but also upon handset capabilities, operating systems, application performance and other digital ecosystem components that significantly influence service delivery and user perception.



- d) Accordingly, while telecom service providers remain responsible for matters within their control, such as network performance, provisioning, billing and customer support, they are not accountable for deficiencies arising from user devices, operating systems, mobile applications or other third-party ecosystem components that influence consumer experience and consequent complaints. The revised framework therefore must provide greater clarity in attribution of complaints and delineation of responsibilities in the modern digital communications ecosystem to ensure customer grievances are addressed seamlessly.

## **2. Emerging Sources of Consumer Complaints and Need for Regulatory Clarity**

- a) We understand that a considerable number of consumer complaints relating to service quality and user experience now arise from factors attributable to user equipment, mobile applications, operating systems, content delivery mechanisms or third-party digital platforms, rather than the telecom network alone.
- b) Such complaints often create practical difficulties in identifying the appropriate entity responsible for resolution and accountability. Further, applications and handset manufacturers are presently not subject to the same regulatory obligations applicable to licensed telcos, despite their increasing role in determining end-user experience.
- c) In this evolving technological environment, there is a need to strengthen and update the complaint redressal framework to ensure greater clarity in responsibilities, transparency in grievance handling, timely resolution of complaints and effective consumer protection while recognising the shared and distributed nature of modern digital communications services.

## **3. Operational and Cost Challenges of Certain Mandates**

- a) Further with respect to the draft TCCR, 2026, we submit that mandate requiring IVR support across every official State language would, in practice, give rise to considerable technical and operational difficulties. Trained personnel for lesser-spoken scheduled languages remain in limited supply, and AI-driven translation tools have not yet attained the degree of reliability needed for such languages in a live, real-time customer service environment. It is also submitted that an excessively multilingual IVR, rather than aiding consumers, risks becoming operationally cumbersome and potentially confusing to navigate.
- b) Further, with regard to operating hours, we submit that the existing window of 0800 hrs to 2400 hrs adequately meets the practical needs of the overwhelming majority of consumers. Further many time sensitive issues like device and number blocking and fraud reporting are already being handled by DoT Sanchar Saathi portal and there is no emergent need to increase the timelines of call centre. An extension to round-the-clock operations would entail substantial additional costs including night-shift staffing, supervision,



and manpower allocation — without any proportionate benefit being demonstrated. We respectfully submit that the current operating window represents a well-considered and balanced standard.

#### **4. Print-Based Publication in the Digital Age**

- a) We submit that the existing print-based requirement does not effectively serve consumer outreach, as grievance redressal is time-sensitive and requires immediate access to information.
- b) It is imperative to note that the consumer behaviour has shifted significantly toward digital engagement, with users increasingly relying on mobile applications, websites, and assisted channels rather than print media.
- c) The distribution of newspapers in rural and remote areas remains irregular and limited, which substantially undermines the effective dissemination of public notifications. As a result, consumers are highly likely to miss critical information published in print media. Furthermore, in the event of a network outage, a consumer would not have practical access to a newspaper that may be three to four months old, thereby rendering such information largely obsolete.
- d) Moreover, consumer behaviour has shifted decisively toward digital engagement, with users increasingly relying on mobile applications, websites, and assisted channels rather than print media. Moreover, even among intended beneficiary groups such as elderly and rural consumers, access is typically facilitated through assisted or interpersonal channels, rather than through independent reliance on newspaper publications.
- e) Thus, we submit that the proposed requirements relating to publication of Complaint Monitoring System details and consumer grievance information in newspapers may not align with the current digital communication environment and is therefore not required. Instead, the TRAI can opt for a more practical solution of 6 monthly SMS broadcast to address this requirement.

#### **5. Duplication of Existing, Well-Functioning Mechanisms**

- a) The proposed requirements relating to separate “Appeal” options in IVRS and digital portals, mandatory “Consumer Corner” sections on websites, and additional complaint status update obligations may duplicate mechanisms and practices already being implemented by service providers. Existing complaint handling frameworks already provide adequate escalation, review, and consumer communication mechanisms through SMS, email, websites, mobile applications, and customer care interfaces. Further, introducing separate appeal



categories at the initial stage may also create confusion for consumers, as appeals generally arise only after completion of the complaint resolution process.

- b) Similarly, telcos already have appropriate accessibility measures and support processes in place for Persons with Disabilities (PwDs), including accessible customer support channels and digital platforms in line with applicable guidelines. Accordingly, the proposed provisions may lead to duplication of existing systems and processes without providing any significant additional consumer benefit.
- c) Further, the complaint handling process must remain aligned with the procedures prescribed under applicable regulations, including the Quality of Service Regulations, TCCCPR 2018, and TCPR 2012. We submit that the compliance with timelines in isolation, without corresponding adherence to the prescribed complaint processing framework, may create operational and procedural inconsistencies and therefore must be aligned with the processes under these regulations.

## **6. Consumer Education Workshops (CEWs)**

- a) We would like to submit that while our member TSPs remain fully committed to the objectives of Consumer Education Workshops (CEWs), the current requirement of conducting such workshops primarily in physical or hybrid mode presents significant operational, logistical, and financial challenges. Organising workshops across multiple districts, including remote and security-sensitive regions, often results in low participation, scheduling disruptions due to climatic conditions, and substantial expenditure on venue management and travel.
- b) In this regard, it is submitted that conducting CEWs through online/digital platforms would enable wider reach, greater flexibility, and enhanced consumer participation. Digital workshops facilitate participation by consumers across geographical locations, including working professionals, senior citizens, students, and persons with mobility constraints thereby significantly enhancing the effectiveness and inclusivity of consumer awareness initiatives.
- c) Accordingly, we request the Authority to permit TSPs to conduct CEWs through online/digital mode. It is further proposed that TSPs may conduct one physical CEW per Licensed Service Area annually, while the remaining workshops may be allowed in online mode. Such an approach would improve ease of doing business, optimise resources, and substantially expand the reach and impact of consumer education programmes.



## **7. Survey and Reporting Obligations**

- a) Section 11(1)(b)(v) of the TRAI Act requires the TRAI to carry out surveys to measure the services being offered and if required TRAI should appoint a third party agency for the same and publish the survey results like drive test reports, instead of delegating this mandate to TSPs.
- b) Consumer feedback on complaint resolution is already an integral part of the existing complaint handling mechanism through existing feedback systems and is primarily intended for internal monitoring and service improvement. Mandating separate surveys for every complaint or appeal, along with quarterly reporting of detailed satisfaction data, may lead to procedural duplication and additional compliance burden.
- c) Further, the proposed comprehensive KPI reporting framework for complaints and appeals would require extensive operational, reporting, and system-level changes, despite most of the proposed parameters already being internally monitored by service providers. Publication and reporting of highly granular statistics may also not provide meaningful regulatory insights and could lead to misinterpretation without adequate operational context. Accordingly, the existing reporting and monitoring framework should be continued.

## **8. Proportionate Enforcement and Financial Disincentives**

- a) While we understand the Authority's objective of strengthening regulatory oversight, the proposed framework relating to per-incident financial disincentives, delayed reporting penalties, and interest on unpaid amounts would lead to a significant escalation in punitive enforcement and impose an increased compliance burden on service providers, who are already subject to regulatory levies substantially higher than global benchmarks.
- b) The proposed penalties and interest provisions appear disproportionate, particularly where operational, technical, or external factors may impact complaint handling and reporting processes. Existing monitoring, corrective engagement, and oversight mechanisms already provide adequate regulatory supervision, and therefore the current framework should be continued to avoid unnecessary financial and operational burden.
- c) Furthermore, when most of the customer centric parameters are under the FD framework in QoS regulations, introducing the FDs in complaint handling and appeal handling would be like a double whammy for TSPs.



## 9. Ensuring Consumer Protection Across the Entire Communications Ecosystem

- a) Lastly, but most importantly, it is submitted that the proposed amendments do not extend their applicability to app-based communication services, which today constitute an integral and dominant part of the consumer communications ecosystem. These platforms provide services which are perfect substitutes to telecom service providers, including voice, video, and messaging functionalities that are functionally equivalent to traditional telecom access services, yet they continue to remain outside the ambit of the proposed consumer grievance redressal framework.
- b) It is also pertinent to note that telecom service providers do not have direct control or visibility over fraudulent activities, scams, or misleading communications occurring through app-based communication platforms. Such platforms operate independently over the internet, and the content, users, and interactions hosted on them are outside the operational domain of telcos.
- c) It is therefore submitted that the Authority may include all app-based communication service providers within the ambit of these regulations, to ensure technological neutrality, consumer equity, and a level playing field across the communications ecosystem.

Sr No.	Regulation	Remarks	Proposed Regulation
1	<p><b>1. Short title, extent and commencement.</b></p>		
	<p>1. These regulations may be called the Telecom Consumers Complaint Redressal Regulations, 2012.</p>		
	<p>2. They shall come into force from the date of their publication in the Official Gazette.</p>	<p>1. We submit that the Draft Regulation entails substantial changes to customer-service platforms, network interfaces, IT systems, reporting architecture and cross-functional operating processes.</p> <p>2. If implemented in existing shape, these regulations shall come into force after 6 - 9 months from the date of their publication in the Official Gazette.</p>	<p>These shall come into force after 6-9 months from the date of their publication in the Official Gazette.</p>
	<p><del>1. 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><del>(i) Basic Telephone Service;</del></p> <p><del>(ii) Unified Access Services;</del></p> <p><del>(iii) Cellular Mobile Telephone Service;</del></p> <p><del>(iv) 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 for Access Service,</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 for Access Service,</p> <p>(iii) Internet Service Authorization under any licence,</p> <p>(iv) Main Service Authorization under the Telecommunication Act, 2023, for providing Access (Wireline, Wireless) or Internet Services;”</p> <p>(v) GMPCS license holders</p>

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>(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 whose <del>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, and the</p>	<p>1. The definition of “Access Service” be aligned with the formulations already adopted in <i>The Standards of Quality of Service of Access (Wireline and Wireless) and Broadband (Wireline and Wireless) Service Regulations, 2024.</i></p>	<p><b>Access Service (Wireless)”</b> means telecommunication service provided through a wireless telecommunication network under access service authorization.</p> <p><b>“Access Service (Wireline)”</b> means the</p>

Sr No.	Regulation	Remarks	Proposed Regulation
	words “wireline access service” and “wireless access service” shall be construed accordingly.		collection, carriage, transmission, and delivery of voice or non-voice messages over the Public Switched Telephone Network within a licensed or authorized service area and includes the provision of all types of services except those requiring a separate license or authorization.
	(c) “ <b>Appellate Authority</b> ” means Appellate Authority appointed under regulation 10, by a service provider;		No changes proposed.
	(d) “ <b>Authority</b> ” means the Telecom Regulatory Authority of India established under subsection (1) of section 3 of the Act;		No changes proposed.
	(e) <del>“<b>Basic Telephone Service</b>” 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>  “ <b>Authorization</b> ” means the authorization as defined in the Telecommunications Act, 2023;		“ <b>Authorization</b> ” means authorization or <b>Unified License</b> . as defined in the Telecommunications Act, 2023.
	(f) <del>“<b>Broadband</b>” or “<b>Broadband Service</b>” means a data connection that is able to support</del>		“ <b>Broadband</b> ” means a data connection, through wireless media ( <b>terrestrial or Satellite</b> ) or wireline access media, that is able to support

Sr No.	Regulation	Remarks	Proposed Regulation
	<p><del>interactive services including Internet access and has the capability of the minimum download</del></p> <p><del>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.]</del></p> <p>“Broadband” 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) “Broadband Service” means a data service provided using broadband data connection by Internet Service Provider or Wireless Access Service Provider under any license or authorization;</p>		<p>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>(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</del></p>		<p>No changes proposed.</p>

Sr No.	Regulation	Remarks	Proposed Regulation
	<p><del>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>		
	<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 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</p>		No changes proposed.

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>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.
	<p>(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;</p>		No changes proposed.
	<p>(n) <b>“Regulations”</b> means the Telecom Consumers Complaint Redressal Regulations, 2012;</p>		No changes proposed.
	<p>(o) <b>“Service Provider”</b> means any service provider having License/ Authorization as mentioned under sub regulation (3) of regulation 1;</p>		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> <p>(i) a request for change of tariff plan;</p> <p>(ii) a request for activation or deactivation of a value added service or a supplementary service or a special pack;</p> <p>(iii) a request for activation of any service available</p>		<p>(pa) <b>“Service Query”</b> means any query made by the consumer regarding the services provided by the Service Provider, or services availed by the consumer.</p>

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>on the service provider's network; and            (iv) a request for shift or closure or termination of service or for billing details;</p> <p>(pa) <b>“Service Query”</b> means any query made by the consumer regarding the services provided by the Service Provider;</p>		
	<p>(q) <b>“SMS”</b> 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) <b>“Survey”</b> means Online Consumer Survey taken upon the resolution or closure of any formal complaint/appeal;</p>	<p>1. There is no need to define the survey as the online consumer feedback is an internal process of the TSPs and TRAI should not mandate the same. In case TRAI is interested, it can carry out third party surveys and publish the results.</p>	<p><b>This definition should be removed.</b></p>
	<p>(r) <del><b>“system”</b> means the ‘Web Based Complaint Monitoring System’ established under subregulation of regulation 6.</del></p>		<p>No changes proposed.</p>
	<p>(s) <del><b>“Unified Access Services”,</b></del></p> <p>(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></p> <p>(ii) <del>refers to transmission of voice or non-voice messages over Licensee's Network in real time</del></p> <p><del>only but service does not cover broadcasting of</del></p>		<p>No changes proposed.</p>

Sr No.	Regulation	Remarks	Proposed Regulation
	<p><del>any messages, voice or non-voice, except, Cell Broadcast which 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>		
	<p>(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.</p>		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</p>	<p>1. We respectfully <u>submit that mandating support for all official languages of the state(s) may create significant operational and technical challenges for service providers.</u></p> <p>2. These include <u>difficulties in availability of trained IVR and customer support personnel for lesser-spoken languages</u>, as well as complexities in integrating multiple languages into existing CRM and IVR systems.</p> <p>3. Further, currently available AI-based translation and voice tools may not provide reliable and accurate support for several low-resource languages such as Bodo and Manipuri. Addition</p>	<p><b><i>We submit that the below proviso be deleted.</i></b></p> <p><del><i>Provided also</i> that a Complaint Centre for a service area shall provide the service in the <u>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.</u></del></p>

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>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 addition to Hindi and English</del> 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.</p> <p><i>Provided also</i> that the Complaint Centre shall register appeal, if any, preferred by the consumer through Consumer Care Number <u>or separate dedicated number for the same.</u></p>	<p>of multiple language options may also result in overly complex IVR structures, which could adversely impact ease of navigation and overall consumer experience.</p> <p>4. We also submit that regulators in <u>other sectors, including RBI, and the Department of Consumer Affairs, do not mandate support for all official languages in their IVR systems and therefore, similar flexibility must be provided to telcos as well.</u></p>	
	<p>4. Every service provider, who is granted a licence/<u>authorization</u> 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>2. Every Complaint Centre shall be accessible to the customers <del>between 0800 hrs and 2400 hrs</del> <u>round the clock</u> on all days of the week.</p>	<p>1. We submit that the <u>existing provision allowing operations between 0800 hrs and 2400 hrs appears to be fully sufficient</u> for meeting all requirements.</p> <p>2. Extending this to <u>“round the clock” (24*7) operations may place an unnecessary strain on manpower and incur significant additional costs.</u></p>	<p><b>The earlier clause should be retained.</b></p> <p>Every Complaint Centre shall be accessible to the customers between 0800 hrs and 2400 hrs on all days of the week.</p>

Sr No.	Regulation	Remarks	Proposed Regulation
		<p><u>including night shift allowances, supervision, and logistics, without any proportionate benefit.</u></p> <p>3. Therefore, it is respectfully submitted that <u>the current time window is the most balanced and efficient approach</u> and the same should be retained.</p> <p>4. It is further submitted that IVR-based complaint registration and <u>consumer support facilities are already available on a round-the-clock (24x7) basis</u>, thereby ensuring continuous accessibility for consumers.</p> <p>5. Further the time sensitive complaints like SIM/mobile blocking or fraud reporting are handled by DoT's Sanchar Saathi portal so there is no need of a 24 Hrs customer care support. We request the Authority that current provisions should be continued with.</p>	
	<p>3. 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.</p>		No changes proposed.
	<p>4. 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.</p>		No changes proposed.

Sr No.	Regulation	Remarks	Proposed Regulation
	5. 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.
	6. The “Consumer Care Number” shall be toll free.		No changes proposed.
	7. 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 services.		No changes proposed.
	<p>8. 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>1. We submit that the <u>existing complaint handling mechanism, as presently structured, is already dynamic, robust and adequately serves consumer needs. The proposal to introduce a separate “Appeal” option in digital portals may not be necessary.</u></p> <p>2. In the current framework, consumer grievances are effectively addressed through the complaint mechanism itself, which includes escalation and review processes internally.</p> <p>3. Further, the existing IVR mechanism already routes complaints to the relevant categories based on consumer selections. Any change to this established flow may disrupt the mechanism and unnecessarily increase consumers’ time in navigating the system.</p> <p>4. <u>The introduction of a distinct “Appeal” category at the initial registration stage risks creating</u></p>	<p>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>(b) the second level of the IVRS provides for options relating to appeal and the broad categories of complaints and service requests;</p> <p>(c) the third level of the IVRS provides for a sub-menu under complaints and service requests, separately;</p>

Sr No.	Regulation	Remarks	Proposed Regulation
	<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, 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><u>confusion for consumers</u>, who may not clearly distinguish between a first-time complaint and an appeal. Moreover, appeals are typically triggered only after a complaint has been processed and a response provided. Treating "Appeal" as a parallel option from the outset may lead to procedural overlap and inefficiency.</p> <p>5. Therefore, we submit <u>that the existing complaint and service request options are sufficient to capture all consumer issues</u>, and any appeal against a complaint resolution can be handled through the same channel without requiring a separate menu option.</p> <p>6. The current IVRS structure should be retained as the same will avoid unnecessary complexity for both consumers and telcos.</p>	
	<p>9. 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> <ol style="list-style-type: none"> <li>1. 'Complaint',</li> <li>2. 'Appeal',</li> <li>3. 'Service Request or Query'</li> </ol> <p>b. Subsequent to selection made at previous level,</p>	<p>1. We submit that the <u>existing complaint handling mechanism on web portal/ websites as well as mobile application is already dynamic, robust and adequately serves consumer needs. The proposal to introduce a separate "Appeal" option in digital portals may not be necessary.</u></p> <p>2. Further, the consumers already have the option to file an appeal if they are not satisfied with the resolution provided by the telcos.</p> <p>3. <u>The introduction of a distinct "Appeal" category at the initial registration stage risks creating confusion for consumers</u>, who may not clearly distinguish between a first-time complaint and</p>	

Sr No.	Regulation	Remarks	Proposed Regulation
	<ol style="list-style-type: none"> <li>1. The application will provide context-specific sub-menu under the complaints, appeals and service requests or queries, separately;</li> <li>2. 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.</li> </ol> <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> <ol style="list-style-type: none"> <li>1. The initial update regarding the acknowledgement of service request/complaint with docket number is shared with the consumer,</li> <li>2. Depending on the category of complaint, the relevant information regarding expected time for resolution and information about allotment of technician, if required, shall be shared with the consumer,</li> <li>3. 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</li> </ol>	<p>an appeal.</p> <p>4. Therefore, we submit <u>that the existing complaint and service request options are sufficient to capture all consumer issues.</u></p>	

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>for such delay along with the revised estimated timeline for resolution.</p> <p>4. Once the complaint is closed, a confirmation message with survey link is shared with consumer.</p>		
	<p>10. 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>		
	<p>11. 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 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>1. We respectfully submit that telcos already have appropriate <u>processes and accessibility measures in place for assisting Persons with Disabilities (PwDs)</u>, including accessible customer support channels and digital platforms in line with applicable DoT guidelines dated 31.07.2025.</p> <p>2. Therefore, the proposed provisions may lead to duplication of existing practices already being implemented by service providers.</p>	<p><b>We submit that this clause be deleted.</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</p>		

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>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 “General Information Number”, shall use such short code.</p>		
5.	<b>5. Publication of Information</b>		
	<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> each in Hindi and English and in a leading newspaper published in <del>a local language of the service area</del> official language/languages of the state(s) in the licensed service area;</p> <p>(b) display on the website of the service provider, <del>as well as on the mobile application</del>;</p> <p>(c) updation of SIMs of consumers by pre-configuration or over the air transfer;</p>	<p>1. We submit that the <u>existing print-based requirement does not effectively serve consumer outreach as grievance redressal is time-sensitive, requiring immediate access to contact information.</u></p> <p>2. <u>The newspaper distribution in rural and remote areas remains inconsistent and limited, reducing effective dissemination of Information.</u> Consequently, consumers in such areas are highly likely to miss these notifications published in newspapers.</p> <p>3. Further, a consumer facing a network outage is unlikely to have access to that specific newspaper, which might be 3 or 4 months old, containing such information, thereby limiting its</p>	<b>We submit that this clause be deleted.</b>

Sr No.	Regulation	Remarks	Proposed Regulation
	(d) display in all Complaint Centres and sales outlets; and the telephone bills issued by the service provider.	<p>practical utility.</p> <p>4. <u>Consumer behaviour has shifted significantly toward digital engagement, with users increasingly relying on mobile applications, websites, and assisted channels rather than print media.</u> Digital platforms offer real-time, updated, and easily accessible information, thereby better serving consumer protection objectives.</p> <p>5. <u>Even for the intended beneficiary groups such as elderly and rural consumers, access is typically facilitated through assisted or interpersonal channels</u> rather than independent reliance on newspaper publications.</p> <p>6. Therefore, we respectfully submit that the Authority to kindly remove the existing mandate for newspaper publication of Information and permit telcos to adopt more effective, accessible, and contemporary modes of communication for dissemination of such information.</p> <p>7. If required the information can be disseminated through a periodic SMS to the customers</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.	1. Kindly refer to response above	<b>We submit that this clause be deleted.</b>
	(3) In case of any change in the “Consumer Care Number” or the “General Information Number”,	-	No changes proposed.

Sr No.	Regulation	Remarks	Proposed Regulation
	the same shall be publicised at least one week prior to such change, in the manner specified in sub-regulation (1).		
	<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> <ol style="list-style-type: none"> <li>Details of Complaint Center,</li> <li>Details of Appellate Authority,</li> <li>Report of Consumer Satisfaction Surveys (as described in regulation 14.A.),</li> <li>Quarterly Performance Reports (as per sub regulation (2) of regulation 15);</li> </ol>	<ol style="list-style-type: none"> <li>The proposed requirement may not be necessary, as the relevant details relating to <u>Complaint Centre and consumer grievance mechanisms are already being displayed by service providers on their websites</u> in compliance with existing regulatory provisions.</li> <li>Further, telcos are already in compliance with TRAI’s Direction dated 12th March, 2026 on display of information relating to Complaint Centre and Appellate Authority on websites and mobile applications.</li> <li><u>Therefore, prescribing a separate “Consumer Corner” on the homepage may lead to duplication of information</u> without providing any significant additional benefit to consumers.</li> </ol>	<b>We submit that this clause be deleted.</b>
	<b>6. Establishment of Complaint Monitoring System</b>		
	(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.		No changes proposed.
	(2) Every service provider shall ---- (a) <del>immediately on establishment of the ‘Web</del>	1. We submit that the information relating to the <u>Complaint Monitoring System, including the URL and complaint handling procedure, is</u>	<b>We submit that this clause be deleted.</b>

Sr No.	Regulation	Remarks	Proposed Regulation
	<p><del>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 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; 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;</del></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><u>already being communicated to consumers through multiple digital channels such as SMS, email, websites, mobile application and assisted customer support channels.</u></p> <p>2. We further submit that newspaper distribution in rural and remote areas remains inconsistent and limited, reducing effective dissemination of such information. Consumers facing network outages or service issues are also unlikely to have access to the specific newspaper publication containing these details at the time of need, thereby limiting its practical utility.</p> <p>3. Also, consumer behaviour has significantly shifted toward digital engagement, with users increasingly relying on mobile applications, websites, and assisted channels rather than print media. Digital platforms provide real-time, updated, and easily accessible information.</p> <p>4. <u>Therefore, mandatory publication in newspapers may not be necessary as digital platforms enable real-time updates and more effective communication with consumers.</u></p>	
	<p>(3) <del>Any change in the address of the 'Web Based Complaint Monitoring System' shall also be intimated to the consumers in the same manner as specified under sub-regulation (2).</del></p>		No changes proposed.

Sr No.	Regulation	Remarks	Proposed Regulation
	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).		
	(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'.		
	(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>	<ol style="list-style-type: none"> <li>1. We submit that consumers are already being regularly <u>updated regarding complaint status, actions taken, and resolution through existing customer care interfaces.</u></li> <li>2. <u>In a highly competitive market, there is no need for Regulatory Intervention.</u></li> <li>3. Hence, it should be left to telcos to determine the appropriate mode and frequency of updates in a consumer-friendly and operationally efficient manner.</li> </ol>	<b>We submit that this clause be deleted.</b>
7.	<b>7. Handling of complaints by Complaint Centre</b>		
	<p>(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;</p> <p><del>— Provided that the docket number assigned under clause (a) of sub-regulation (1) of regulation 4 of the Telecom Consumers Protection and Redressal of Grievances Regulations, 2007 (3 of 2007), shall continue</del></p>		No changes proposed.

Sr No.	Regulation	Remarks	Proposed Regulation
	<p><del>to be the docket number for the purpose of these regulations;</del></p> <p>Provided <del>further</del> 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>	<ol style="list-style-type: none"> <li>1. There is no need or justification to increase the burden on complaint management systems by increasing the duration of record keeping.</li> <li>2. TSPs already maintain extensive grievance redressal systems, complaint tracking mechanisms and audit processes through automated digital platforms wherein most consumer grievances and appeals are resolved within substantially shorter timelines.</li> <li>3. Therefore, we recommend that the record keeping should be kept for three months only.</li> </ol>	<p>Every service provider shall retain in the system, the details of complaints against each docket number for a minimum period of <del>three</del> months.</p>
	<p>(3) Every Complaint Centre shall.-----</p> <p>(a) at the time of registering of the complaint,-</p> <ol style="list-style-type: none"> <li>(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</li> <li>(ii) update the system with the date and time of registration of the complaint, docket number assigned under sub-regulation (1), the telephone number</li> </ol>		

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>of the consumer, and the time indicated to the consumer for resolution of the complaint (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></p> <p>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) Services Regulation, 2024, Telecom Commercial Communication Customer Preference</p>		No changes proposed.

Sr No.	Regulation	Remarks	Proposed Regulation
	Regulation, 2018 and Telecom Consumers Protection Regulations, 2012 issued by the Authority;		
	(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 & Wireline) and Broadband (Wireless & 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.		No changes proposed.
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</del>	<ol style="list-style-type: none"> <li>1. The option of filing appeals via <i>post</i> is outdated and misaligned with the broader objective of digitizing consumer grievance redressal.</li> <li>2. Postal submissions inherently cause avoidable</li> </ol>	<b>Sub-regulation (1):</b> A consumer may prefer to file an appeal directly with the Appellate Authority through any of the following modes:

Sr No.	Regulation	Remarks	Proposed Regulation
	<p><del>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;</p> <p><i>Explanation:</i> For the purpose of this sub-regulation post includes courier.</p>	<p>delays, lack real-time tracking, and create uncertainty regarding receipt and processing.</p> <p>3. In light of the availability of faster, more transparent, and accountable digital channels—such as email, mobile applications, dedicated portals, and complaint centres—we submit that the provision for filing appeals through post should be <b>deleted</b>.</p>	<p>email, mobile application, website/portal, complaint centre, post, or in person.</p> <p><b>Explanation:</b> For the purposes of this sub-regulation, the term <i>post</i> shall include courier service</p>
	<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>		<p>(4) 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 45 days if it is satisfied that there was sufficient cause for not filing it within that period.</p>
	<p>(3) No fee shall be charged from a consumer for filing an appeal before the Appellate Authority.</p>		
10.	<p><b>10. Appellate Authority - Establishment and Composition</b></p>		
	<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</p>	<p>1. We submit that the establishment of an Appellate Authority should be left to the operational discretion of telcos, based on their organisational structure, service architecture, and operational requirements.</p> <p>2. This would provide necessary flexibility while ensuring effective grievance redressal and a</p>	

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>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 dispose of the appeals filed under sub regulation (1) of regulation 9;</p> <p><i>Provided that</i> 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, <i>in each license service area</i>;</p> <p><del>—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.</del> “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.”;</p>	principle based approach by the Authority	
	(2) The Appellate Authority shall consist of one or more persons <del>as may be decided by the service provider.</del> <i>who should be a regular employee in the senior management of the service provider with at least 5 years of experience.</i>	1. We submit that the composition of the Appellate Authority, including the number of persons, eligibility criteria, and experience requirements, should be left to the discretion of telcos based on their internal governance mechanisms.	<b>We submit that this clause be deleted.</b>
	(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</del>	1. We <u>reiterate that that newspaper distribution in rural and remote areas remains inconsistent and limited</u> , reducing effective dissemination of such information.	<b>We submit that this clause be deleted.</b>

Sr No.	Regulation	Remarks	Proposed Regulation
	<p><del>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/languages(s) of the state(s) in the licensed service area, 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>	<ol style="list-style-type: none"> <li>2. Also, <u>consumer behaviour has significantly shifted toward digital engagement, with users increasingly relying on mobile applications, websites, and assisted channels rather than print media.</u> Digital platforms provide real-time, updated, and easily accessible information.</li> <li>3. Even for the intended beneficiary groups such as elderly and rural consumers, access is typically facilitated through assisted or interpersonal channels rather than independent reliance on newspaper publications</li> <li>4. Therefore, <u>mandatory publication in newspapers may not be necessary as digital platforms enable real-time and more effective communication with consumers.</u></li> </ol>	
	<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>No changes proposed.</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.</p> <p>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</p>	<ol style="list-style-type: none"> <li>1. We reiterate that the <u>telecommunications sector plays a critical role in enabling digital connectivity, economic growth, social inclusion, and access to essential services.</u></li> <li>2. Telcos remain <u>fully committed to ensuring timely, effective, and consumer-centric grievance redressal</u> through robust complaint management frameworks, multi-channel customer care systems, digital interfaces, and technology-enabled support mechanisms.</li> </ol>	<p><b>We submit that this clause be deleted.</b></p>

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>Authority from time to time.</p>	<p>3. Further, the senior management of telcos is already aware of and actively monitors grievance redressal and consumer complaint handling mechanisms.</p> <p>4. In light of the above, it is respectfully <u>submitted that the proposed requirement for placing detailed quarterly reports before the CEO or Board of Directors may be operationally excessive and prescriptive in nature.</u></p> <p>5. Complaint handling and consumer service parameters are already continuously monitored through <u>established internal governance, compliance, and operational review mechanisms.</u></p> <p>6. Accordingly, the Authority may consider providing flexibility to telcos in determining the appropriate internal oversight and review mechanism to ensure effective consumer grievance redressal and accountability.</p>	
11.	<p><b><del>11. Advisory ——— Committee Establishment, Composition and Functions</del></b></p>		
	<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</del></p>		<p>No changes proposed.</p>

Sr No.	Regulation	Remarks	Proposed Regulation
	<p><del>the Authority and the other member shall be a representative of the service provider;</del></p> <p><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><del>(3) 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><del>(4) 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></p> <p><del>— Provided that such member shall not be removed before completion of his tenure, except with the prior written approval of the Authority;</del></p> <p><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><del>(5) 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 Advisory Committee.</del></p>		

Sr No.	Regulation	Remarks	Proposed Regulation
	<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 <b>Secretariat and an office</b>, required supporting staff and office accommodation for the Appellate Authority to discharge its functions under these regulations.</p>	<p>1. The existing framework is functioning effectively, and there is no demonstrated need to mandate a separate office of the Appellate Authority. Consumer interests are adequately safeguarded so long as appeals remain accessible, are duly examined, and resolved within the prescribed timelines.</p> <p>2. Requiring the establishment of a separate office would amount to unnecessary structural prescription and micro-regulation, without delivering any commensurate benefit to consumers</p>	<b>We submit that this clause 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>		
	<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</del></p>		No changes proposed.

Sr No.	Regulation	Remarks	Proposed Regulation
	<p><del>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 consideration.</del></p>		
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</del></p>		No changes proposed.

Sr No.	Regulation	Remarks	Proposed Regulation
	<p><del>dispose of the appeal by passing a reasoned order in writing stating therein the points for determination and the decision thereon;</del></p> <p><del>----- Provided that the Appellate Authority shall, while deciding the appeal, give due consideration to the advice given by the Advisory Committee;</del></p> <p><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 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</p>	<p>1. The option of filing appeals via <i>post</i> is outdated and inconsistent with the broader objective of digitizing consumer grievance redressal.</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, post, or by in-person), register it by assigning a unique appeal number;</p>

Sr No.	Regulation	Remarks	Proposed Regulation
	through SMS and/or e-mail to the consumer;		b) acknowledge the appeal, immediately on its receipt, by sending the unique appeal number through SMS and/or e-mail to the consumer;
	(2) 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.		
	(3) 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.		
	<b><u>14. A. Online Consumer Survey</u></b>		
	(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.	1. We submit that consumer feedback on complaint resolution <u>is already an integral and well-established part of the existing complaint handling mechanism.</u>	<b>We submit that this clause be deleted.</b>
	(2) The Survey shall be instantly accessible to the complainant via a dedicated, secure electronic link transmitted through electronic means, such as email (if available) and SMS besides service provider's mobile application and website.	2. Telcos currently administer satisfaction surveys through IVRS feedback options which effectively capture consumer sentiment on resolution quality using similar rating scales, without requiring a separate regulatory mandate.	
	(3) The Survey must collect specific, complainant-provided feedback concerning the complaint/appeal resolution in the following metric on scale of 1 to 5:	3. The proposed requirement to administer an immediate, dedicated survey for every formal complaint or appeal, followed by quarterly would introduce significant procedural duplication.	
		4. Moreover, <u>these surveys are primarily intended</u>	

Sr No.	Regulation	Remarks	Proposed Regulation
	1: Totally Dissatisfied 2: Largely Dissatisfied 3: Somewhat Satisfied 4: Largely Satisfied 5: Fully Satisfied	<p><u>for internal monitoring, service enhancement, and process improvement.</u> Hence, there may not be a need to separately share detailed consumer satisfaction data relating to complaints with the Authority on a quarterly basis along with the Quarterly Performance Report (QPR).</p> <p>5. Therefore, we <u>respectfully request that the Authority to kindly reconsider the need for this separate survey regulation,</u> as the existing complaint mechanism already incorporates consumer feedback effectively.</p>	
	(4) <del>The service provider shall share the detailed consumer satisfaction data, in 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.</del>	1. The existing reporting requirements adequately address the regulatory objectives and should continue without modification.	<b>We submit that this clause be deleted.</b>
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.	1. Once an appeal has been resolved and the prescribed escalation period has lapsed, continued record retention does not contribute to redressal or enhance consumer outcomes. Accordingly, the determination of the retention period should be left to the discretion of TSPs	<b>The clause should be revised as below:</b>  The Appellate Authority shall maintain records of all preferred appeals, including relevant details and documents obtained from the concerned division or department of the service provider, together with the decisions rendered and the actions taken for resolution of the dispute.
	(2) <del>Every service provider shall submit to the Authority and also place on its website, by the</del>	1. We respectfully submit that the proposed detailed <u>KPI reporting framework may result in</u>	<b>We submit that this clause be deleted.</b>

Sr No.	Regulation	Remarks	Proposed Regulation
	<p><del>15th of the month succeeding every quarter, a report mentioning therein-----</del></p> <p>(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></p> <p>Every service provider shall submit to the Authority as well as publish the same on their own 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> </ol>	<p><u>significant operational and compliance burden on service providers without corresponding consumer benefit. Most of the proposed parameters are already internally monitored by service providers for effective complaint management and service improvement purposes.</u></p> <p>2. Further, publication and reporting of highly granular complaint, appeal, and survey-related statistics may not provide meaningful regulatory insights and may instead lead to misinterpretation of data without adequate operational context.</p> <p>3. <u>Therefore, the existing framework may be continued, as the proposed additional reporting requirements would lead to duplication, increased compliance burden, and unnecessary complexity without any significant benefit to consumers.</u></p>	

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>ix. Percentage of total complaints resolved,  x. Survey results for Complaints to be 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>(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 shared for following indicators:</li> </ol>		

Sr No.	Regulation	Remarks	Proposed Regulation
	<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 evidence of such publicity.</p> <p>(d) The Authority may from time to time amend or change the reporting requirements, as necessary.</p>		

Sr No.	Regulation	Remarks	Proposed Regulation
	<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> <ul style="list-style-type: none"> <li>(a) complaints alleging violation of the Act or regulations made there under or directions issued or orders made by it under the Act;</li> <li>(b) complaints of the consumers that are generic in nature;</li> <li>(c) complaints alleging that a practices adopted by the service providers adversely affects the interest of the</li> </ul>		No changes proposed.

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>consumers; (d) a complaint of such nature that, in the opinion of the Authority, is required to be resolved expeditiously by the service provider.</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.		No changes proposed.
	(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 <b>to the consumers as well as</b> the Authority within three days of the resolution of the complaint.		No changes proposed.
	(4) In case the investigation and root cause of the complaints referred to under sub-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.		No changes proposed.
17.	<b>17. Telecom Consumers Charter</b>		
	(1) Every Service provider shall within sixty days of the coming into force of these regulations, publish a 'Telecom Consumers Charter' containing the		No changes proposed.

Sr No.	Regulation	Remarks	Proposed Regulation
	<p>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 respect of any of the services;</li> <li>(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 ;</li> </ul>		

Sr No.	Regulation	Remarks	Proposed Regulation
	<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;  (ha) procedure for termination or disconnection of each service plus value added services offered by the service provider; and</p> <p>(i) General Information Number;  (j) Consumer Care Number;  (k) complaint redressal mechanism, including complaint redressal procedure and the time limits for redressal of complaints;  (l) Name, designation, e-mail, contact address, telephone number and facsimile number of the Appellate Authority and time limits for disposal of appeals;  (m) <del>procedure for termination or disconnection of each service plus value added and bundled services offered by the service provider; and</del>  (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</p>	<p>1. Telecom Consumer Charter should <b>only be</b> made accessible through digital channels, including the service provider's website and mobile applications, to ensure ease of access, transparency, and convenience for consumers.</p>	

Sr No.	Regulation	Remarks	Proposed Regulation
	via mobile app.		
	(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.		No changes proposed.
	(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:  <i>Provided that</i> a service provider, who has been granted a <del>licence</del> licence/ authorization after the commencement of these regulations, shall file with the Authority, before commencement of service, a copy of 'Telecom Consumers Charter'.		No changes proposed.
	(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.		No changes proposed
18.	<b>18. Inspection and Auditing</b>		
	1. Every service provider shall maintain complete and accurate records of redressal of complaints by its Complaint Centre and the Appellate	1. The retention period should be left to discretion of TSPs.	<b>The existing clause to be retained:</b>  Every service provider shall maintain

Sr No.	Regulation	Remarks	Proposed Regulation
	Authority, for at least one year after disposal of the complaint/appeal as the case may be.		complete and accurate records of redressal of complaints by its Complaint Centre and the Appellate Authority.
	<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>		
	<p>(1) The authority may conduct periodic regulatory review of the redressal of complaints and appeals by the service providers in the following manner:</p> <p>a. Auditing and/or Inspection as described under regulation 18;</p> <p>b. Audit/Analysis of Quarterly Performance Reports submitted;</p> <p>c. Review based on Consumer Feedback</p>	<p>1. This clause <u>appears to introduce an additional layer of rigid enforcement through per-incident penalties and per-day default provisions, which may not be fully aligned with this broader regulatory approach.</u></p> <p>2. Today, telecom services are increasingly delivered through app-based communication platforms and digital ecosystems. Consumer experience may also be influenced by factors</p>	<b>We submit that this clause be deleted.</b>

Sr No.	Regulation	Remarks	Proposed Regulation	
	gathered via multiple channels;	<p>such as mobile handset compatibility, operating systems, application behaviour, and internet conditions, which may not always be within the direct control of the telecom service provider.</p> <p>3. In our respectful submission, <u>a more balanced and proportionate framework may better support the objective of light-touch regulation while still ensuring effective consumer protection and compliance oversight.</u></p>		
	(2) The Authority may establish a mechanism to seek reports from the Service Providers on consumer feedback received via various channels.			
	(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>(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> <p>a. Rupees One thousand only (Rs. 1000/-) per improper dismissal/disposal of complaint by service provider, and /or</p> <p>b. Rupees Five thousand only (Rs. 5000/-) per improper 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</p>			

Sr No.	Regulation	Remarks	Proposed Regulation
	a reasonable opportunity of representation against the contravention of the regulation observed by the authority;		
	<b>18. B. Violation of Compliances</b>		
	<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, 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>	<ol style="list-style-type: none"> <li>1. We submit that telcos already remain subject to extensive regulatory reporting and compliance obligations under various regulatory frameworks.</li> <li>2. <u>Hence, in line with the broader objective of promoting a balanced and facilitative regulatory framework, it may be appropriate to continue addressing such instances through monitoring and corrective engagement rather than introducing an additional punitive layer of enforcement.</u></li> <li>3. Moreover, the delays in filing QPRs may, in certain cases, arise due to operational, technical, system-related, or data reconciliation issues, particularly considering the scale and complexity of telecom operations.</li> <li>4. Such delays are generally procedural in nature and do not necessarily reflect any deficiency in consumer grievance redressal or service delivery.</li> <li>5. <u>Therefore, the proposed financial disincentive structure and high monetary ceilings appear disproportionate to the nature of the non-compliance.</u></li> </ol>	<b>We submit that this clause be deleted.</b>

Sr No.	Regulation	Remarks	Proposed Regulation
		<p><u>Hence, the FD should not be introduced; rather it should be reviewed and removed in other regulations as well.</u></p> <p>6. <u>Further, if the Authority still wants to introduce FD, then a graded or threshold-based approach should be introduced.</u></p>	
	<p><b>18.C. Consequences for failure of Service Provider to pay Financial Disincentive</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 be liable to pay simple interest on the outstanding amount of financial disincentive, 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.</p>		<p><b>We submit that this clause be deleted.</b></p>
	<p>(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.</p>		<p><b>We submit that this clause be deleted.</b></p>
	<p><b>18. D. The amount payable by way of financial disincentive under these regulations shall be remitted to such head of account as may be specified by the Authority.</b></p>		<p><b>We submit that this clause be deleted.</b></p>

Sr No.	Regulation	Remarks	Proposed Regulation
19.	<p><b>19. Application of other laws not barred</b></p> <p>The provisions of these regulations shall be in addition to, and not in derogation of, any other law for the time being in force.</p>		No changes proposed.
20.	<p><b>20. Reckoning of time limit for the purposes of these regulations</b></p> <p>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.</p>		No changes proposed.
21.	<p><b>21. These regulations not to apply in certain cases</b></p> <p>(1) Nothing contained in these regulations shall apply to any matter or issue for which--</p> <p>(a) any proceedings before any court or tribunal are pending; or</p> <p>(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.</p>		No changes proposed.
22.	<p><b>22. Repeal and saving</b></p> <p>(1) The Telecom Consumers Protection and Redressal of Grievances Regulations, 2007 (3 of 2007) is hereby repealed.</p> <p>(2) Notwithstanding such repeal, anything done or any action taken under the said regulations shall be deemed to have been done or taken</p>		No changes proposed.

Sr No.	Regulation	Remarks	Proposed Regulation
	under the corresponding provisions of these regulations.		
23.	<b>23. Interpretation</b>		
	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.