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

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1. We thank the Authority for providing us the opportunity to share counter comments to the **Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026.** COAI reiterates its primary submission that the telecom industry remains fully committed to ensuring timely, effective, and consumer-centric grievance redressal. However, several proposals in the draft, if implemented in their current form, would introduce disproportionate compliance burdens, operational complexities, and significant costs without commensurate consumer benefit.

2. Further, we reiterate that 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 devices, mobile applications, app-based communication platforms, and data-intensive services.

3. Accordingly, the consumer experience is shaped by multiple digital ecosystem components beyond the control of telecom networks. Therefore, to ensure technological neutrality and uniform consumer protection, app-based communication service providers offering functionally equivalent voice, messaging, and video services should also be brought within the ambit of these regulations.

4. The following counter comments are submitted in response to specific stakeholder submissions-

A. Reduction of Appeal Filing Window

1) Some stakeholders have submitted that reducing the appeal filing window from 30 days to 15 days may disproportionately affect rural consumers, senior citizens, persons with disabilities, and consumers with limited digital literacy.

COAI counter comments:

a) In this regard, we submit that the reduction of the appeal filing timeline from 30 days to 15 days is both reasonable and consumer-friendly. The Explanatory Memorandum rightly notes that dissatisfied consumers generally file appeals without much delay, and the existing period was considered too long, leading to prolonged uncertainty and delayed resolution.

b) The proposed 15-day window continues to provide consumers with sufficient time to understand the complaint resolution, gather relevant documents, and file an appeal through multiple accessible channels including mobile application, website/portal, complaint centre, email, post, or in person.

c) It is further submitted that telecom service providers are already subject to strict timelines for complaint resolution under the Quality of Service Regulations, 2024, TCCCPR, 2018, and TCPR, 2012. Extending the appeal filing period to 30 days would prolong the overall grievance lifecycle without corresponding benefit to either party.

d) Therefore, the existing 15-day appeal filing window, coupled with the 45-day condonation provision, strikes the appropriate balance between expeditious resolution and procedural fairness.

B. <u>24x7 Complaint Centre Operations</u>

1) A few of the stakeholders have supported the proposal for round-the-clock complaint centre operations, stating that telecom services are essential infrastructure and grievance support must be continuously available.

2) Some stakeholders have also stated that round the clock Complaint Centre Operations reflects the requirements of a digital-first economy and would enhance consumer convenience and accessibility.

<u>COAI counter comments:</u>

a) We respectfully submit that the existing operating window of 0800 hrs to 2400 hrs adequately meets the practical needs of the overwhelming majority of consumers. Extending operations to round-the-clock would entail substantial additional costs, including night-shift staffing, supervision, and manpower allocation, without any proportionate benefit being demonstrated.

b) It is further submitted that IVR-based complaint registration and consumer support facilities are already available on a round-the-clock basis, thereby ensuring continuous accessibility for consumers even outside the 0800-2400 hrs window.

c) Additionally, time-sensitive issues such as SIM/mobile blocking and fraud reporting are already handled by the DoT's Sanchar Saathi portal, which operates effectively.

d) Therefore, the existing provision allowing operations between 0800 hrs and 2400 hrs remains the most balanced and efficient approach, and the same should be retained. In case the Authority still decides to amend this, then at best it should be extended to 0600 hours and that too be kept as a hybrid customer support ecosystem, allowing both automation and agent (AI or human) assistance at the choice of TSP.

C. **Multilingual IVR Support**

1) **Some stakeholders have supported the proposal requiring IVR support in all official state languages, stating that this improves inclusivity, accessibility, and consumer empowerment.**

COAI counter comments:

a) We respectfully submit that mandating 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.

b) Addition of multiple language options, which are low in volume, may also result in overly complex IVR structures, which could adversely impact ease of navigation and overall consumer experience.

c) Expanding IVR support to such low-volume languages (other than Hindi and English) presents significant challenges. It requires substantial one-time and ongoing operational costs, increases implementation effort, and risks degrading overall IVR performance by overcomplicating the system architecture.

d) We also reiterate that regulators in other sectors, **including RBI, SEBI and the Department of Consumer Affairs**, do not mandate support for all official languages in their IVR systems. Similar flexibility should be provided to telcos as well.

e) Therefore, the proviso mandating support for all official languages of the state(s) should be deleted, and the earlier provision allowing service in the local language of the service area in addition to Hindi and English should be retained.

D. **Publication of Information in Newspapers**

1) **Some stakeholders have stated that the newspaper publication requirement improves consumer awareness and transparency.**

COAI counter comments:

a) We reiterate that the existing print-based requirement does not effectively serve consumer outreach, as grievance redressal is time-sensitive and requires immediate access to information. Newspaper distribution in rural and remote areas remains irregular and limited, which substantially undermines the effective dissemination of public notifications.

b) Consumer behaviour has shifted decisively toward digital engagement, with users increasingly relying on mobile applications, websites, and assisted channels rather than print media. 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.

c) 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.

d) Thus, 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. Instead, TRAI may opt for a more practical solution of six-monthly SMS broadcast to address this requirement.

E. Separate 'Appeal' Option in IVRS and Digital Portals

1) One of the stakeholders has stated t*he explicit categorization into: Complaints, Appeals, Service Requests/Queries, is particularly beneficial.*

COAI counter comments:

a) We reiterate that the existing complaint handling mechanism on web portals/websites as well as mobile applications is already dynamic, robust, and adequately serves consumer needs. The proposal to introduce a separate "Appeal" option in digital portals may not be necessary.

b) Moreover, the introduction of a distinct "Appeal" category at the initial registration stage risks creating confusion for consumers, who may not clearly distinguish between a first-time complaint and an appeal. Further, 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.

c) Therefore, the existing complaint and service request options are sufficient to capture all consumer issues, and any appeal against a complaint resolution can be handled through the same channel without requiring a separate menu option.

F. Online Consumer Survey and Reporting Obligations

1) **One of the stakeholders has submitted that introducing online consumer survey is a significant step towards modernising the telecom consumer protection framework and strengthening accountability within the sector.**

2) **Another stakeholder have stated that Quarterly Performance Reports (QPRs) is one of the most significant consumer-centric reforms. Further, this is a shift from a limited appeal-focused reporting framework to a broader complaint and appeal reporting mechanism.**

COAI counter comments:

a) We submit that 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.

b) 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.

c) Accordingly, the existing reporting and monitoring framework should be continued. The proposed Regulation 14.A (Online Consumer Survey) and the extensive KPI reporting requirements under Regulation 15(2) should be deleted.

G. Financial Disincentives for Improper Complaint Disposal

1) **Some stakeholders have stated that introduction of Financial Disincentives for improper complaint disposal is a "significant and necessary reform" that will strengthen accountability.**

COAI counter comments:

a) We reiterate that 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 telcos, who are already subject to regulatory levies substantially higher than global benchmarks.

b) Furthermore, this would result in overlapping regulatory penalties for substantially similar service outcomes already governed under the Quality of Service Regulations.

c) Therefore, the current framework should be continued to avoid unnecessary financial and operational burden. Regulations 18.A, 18.B, 18.C, and 18.D relating to financial disincentives should be deleted.

H. Consumer Corner section

1) Some stakeholders have welcomed the proposal to establish dedicated "Consumer Corner" sections and strengthen public disclosure requirements and have further suggested periodic monitoring and compliance verification by the Authority to ensure effective implementation and accessibility.

COAI counter comments:

a) We submit that the proposed requirement for a separate "Consumer Corner" may not be necessary, as service providers are already displaying information relating to Complaint Centres and consumer grievance redressal mechanisms on their websites and digital platforms in compliance with the existing TRAI's directions dated 12th March, 2026 regarding the display of consumer care information on websites and mobile applications.

b) Further, prescribing a dedicated "Consumer Corner" on the homepage, along with additional disclosure and reporting obligations, may lead to duplication of information and existing processes without providing any significant additional benefit to consumers.

c) We further submit that the introduction of additional monitoring, periodic reporting and compliance verification mechanisms over and above the existing regulatory requirements may increase administrative and compliance burdens on service providers without any demonstrated need.

d) The current framework already provides for regulatory oversight and compliance through applicable reporting obligations and directions issued by the Authority. Accordingly, we respectfully submit that the existing disclosure framework is adequate and that the current provisions should be continued.

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