

தென்னிந்திய நுகர்வோர் அமைப்புகளின் கூட்டமைப்பு
കൺസോർഷ്യം ഓഫ് സൗത്ത് ഇന്ത്യ കൺസ്യൂമർ ഓർഗനൈസേഷൻസ് (COSICO)
సాఫ్ ఇండియా కన్స്യూమర్ ఆర్గనైజేషన్స్ (COSICO) కన్సర్టియం
ದಕ್ಷಿಣ ಭಾರತದ ಗ್ರಾಹಕ ಸಂಘಟನೆಗಳ ಒಕ್ಕೂಟ ®

COSICO/DR -CG-7/5

11th June 2026

Shri Vivek Khare
Advisor (CA),
Telecom Regulatory Authority of India
4th, 5th, 6th & 7th Floor, Tower F
World Trade Centre, Nauroji Nagar
New Delhi 110029

Sir (s)

Warm greetings from COSICO®

We refer to the Telecom Consumer Complaint Redressal regulation fourth Amendment 2026. We submit our suggestion, Comments, remarks, recommendations as follows: -

This is the most important aspect of Consumer Protection and needs to be strengthened. Right to redressal is one of the fundamental rights enshrined in the Consumer Protection Act 1986 & 2019 as also in the United Nations Charter.

The spirit of this is enshrined by the wisdom of Mahatma Gandhi who stated: -

“A consumer is the most important visitor on our premises. He is not dependent on us; we are on him. He is not an interruption to our work; he is the purpose of it. We are not doing a favour to a Consumer by giving him an opportunity; infact he is doing us a favour by giving us an opportunity to service him”.

- 1) The Consumer Protection Act 2019 has established and strengthened the Redressal Commissions where compensation of damage including for mental agony and all other incidentals are compensated. However, this is covered under the Act of Parliament.

- 2) The redressal commissions and also Courts insist that every Consumer has exhausted all avenues available which includes the Regulatory system. Which is also reasonable and appropriate. However, if any regulator absolves its responsibility and withdraws totally from addressing this issue then it is sad and would further burden the Commissions.
- 3) Whereas TRAI has made best attempts to do justice to Consumers; there seems to be some pressure from powerful lobbies in the industry that opposes any effort to bring in change.
- 4) Understandable as an Officer of Jio handling Grievance got into an argument to distinguish between “**Consumer**” & “**Customer**”. This may be silly but conveys the attitude. Distinction that we understand is that a customer is more of a business entity / interest Which is what they were trying to relate or communicate. So, they would prefer to treat every grievance from that point of view of expenditure-payout and ARPU. Not withstanding that it is a very narrow and short-sighted outlook.
- 5) We do recognise the fact that TRAI has made several sincere attempts and proposed positive ideas including on Ombudsman scheme which is even now available in Banking & Insurance. The outcome as they have openly admitted is that inspite of strong views expressed by Consumer Organisations they were over ruled because TSPs and their Associations didn’t agree or vehemently opposed.
- 6) The compromise that was arrived or imposed was a 3 tier system Viz: 1st at the Company level then it goes to the next level where in an Advisory Committee with participation of CAG is allowed and then it goes to the Appellate authority by the Company.
- 7) This is flawed **ab initio** because you can’t have the Judge; Jury and executioner being the same. Basic commonsense is that you can’t expect justice from the TSP who would only defend their paymasters and not accept with an independent mind that something wrong has taken place. This is the fundamental problem which we can even provide evidence.
- 8) We have also proof that the TSP accepts that there has been deficiency but justifies them with procedural or their internal problems of providing better infrastructure. How is it justified when the Consumer has to bear the brunt of all of their shortcomings.

- 9) This would not be the case if an independent authority like the district – State-National Commissions or Courts. They would definitely have passed orders for compensation for the grievance sometimes including expenses and in many cases for “mental agony” etc.
- 10) So, if TRAI is unable to reign in the industry for whatever reasons, our humble suggestion is to make an arrangement with the National Commission for an Adalat or similar arrangement for speedier justice. We are willing to join a delegation if TRAI so wants to take it forward.
- 11) TRAI in its explanatory notes has clearly explained the failure of the system and has provided statistics also. While we appreciate the authorities for putting out facts; the inference of failure of Advisory Committee (Participation of CAG) is totally unwarranted or factually wrong. Ground situation are totally different.
- 12) The role of the member of an Advisory Committee has not been defined or guidelines for participation been defined. So how can they be blamed for discontinuing it. Again, TSPs under report or don't follow any guidelines as the explanatory note itself describes, This being the case how can the CAG be indicted?
- 13) But to substitute it with other measures which according to us is an over reach and legally not tenable or enforceable is just a hogwash.
- 14) TRAI isn't able to take strong punitive action within its powers but goes over board with disincentive which is nothing but a fine will not pass the test of law if challenged.
- 15) It is also ironical if not practical to provide an escape route stating that they would get an opportunity to explain. If so who would decide the issue? How fair would it be? Gives room to several unwarranted questions. Also shows the authorities in poor light. Hence should be omitted.
- 16) Earlier experience in the “**Call drop**” shouldn't be ignored. All the averments that TRAI hasn't invested for infrastructure.
- 17) Audits are welcome but proper guidelines and should be done by external agency which can include CAGs also so that they can be more authentic and effective. Otherwise, it would be cosmetic and no use.

18) Lastly; the Complaints can be grouped and TRAI can decide how each of them can be treated under QOS providing for compensation for each deficiency. This has worked in the Electricity sector (KEREC) which was termed as “**Standards of Performance**” and it wasn’t challenged.

1	Network issues
2	Billing
3	Spam calls
4	Others: (Specify)*

In Conclusion; we should arrive at a fool proof highly professional method of resolving amicably the Grievances rather than make futile attempts in the initial stage itself.

Sd..

C P Krishnamurthy

Organising Secretary; Consortium of South India Consumer Organisations (COSICO)