

**CONSUMER PROTECTION ASSOCIATION
HIMMATNAGAR
DIST. : SABARKANTHA
GUJARAT**



Comments on

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

Executive Summary and General Comments:

The draft is directionally correct in expanding consumer-protection obligations to the Telecommunications Act, 2023 authorisation environment, in modernising complaint channels, in requiring more disclosure, and in strengthening TRAI's audit/review powers. But it should be materially revised before finalisation. In particular, the proposed deletion of the Advisory Committee, the shift to an employee-controlled Appellate Authority, the reduction of the consumer's appeal filing window from 30 days to 15 days, and the very low proposed financial disincentives would make the framework more operator-controlled at precisely the time when telecom services have become more essential, more converged, and more digitally mediated.

The correct policy objective is not merely “faster disposal.” It is faster, fairer, independently reviewable, digitally accessible, and

technologically neutral redressal. The TRAI Act requires protection of consumer interests, quality-of-service oversight, periodic surveys, and transparency in regulation. The Consumer Protection Act, 2019 likewise recognizes the consumer’s right to be informed, to be heard, and to seek redressal. Any amendment to TCCRR should strengthen those rights, not compress them.

Comments :

What the draft gets right?

The strongest feature of the draft is its basic attempt to align TCCRR with the Telecommunications Act, 2023, which moves the sector toward an authorisation-based framework. Section 3 of the 2023 Act requires authorisation for provision of telecommunication services and operation of networks, while the Act also expressly enables flexible and technologically neutral spectrum use. That means complaint rights should attach to the service received by the consumer, not to a legacy licence label or network architecture.

That approach is also justified by actual market evolution. TRAI’s March 2026 subscription data show a converged market in which broadband is being delivered over multiple layers: about 46.51 million fixed wired broadband subscriptions, 17.10 million fixed wireless broadband subscriptions, and 1,002.27 million mobile wireless broadband subscriptions. TRAI’s top providers also span both fixed and wireless models, including FTTH/fiber and wireless access. In policy terms, this means that 5G/FWA, FTTH, neutral-host style delivery arrangements, cloud-native operating models, and future 6G

evolutions all point in the same direction: uniform baseline consumer rights across delivery technologies.

The draft is also right to recognize that complaint handling is now multi-channel. TRAI's own 2024 QoS analysis records that providers have launched alternate customer-service interfaces such as mobile apps, web interfaces, and chatbots, but also notes that consumers still face complicated workflows and complex navigation in these channels, and that telephone traffic has not gone away. That is exactly the right diagnosis: digital systems are necessary, but they are not enough on their own.

The proposed Consumer Corner, quarterly performance reporting, online post-resolution survey, and TRAI's enhanced review/audit powers are also constructive in principle. They fit the TRAI Act's transparency mandate and its role in conducting periodic surveys to protect consumers. But these tools must be made more independent, more comparable across providers, and more accessible if they are to be meaningful rather than formalistic.

Comments on Clause 1 — “Short Title, Extent and Commencement”

Clause 1 of the draft amendment is foundational in nature because it determines the legal applicability, territorial jurisdiction, and operational commencement of the amended grievance redressal regime. Although the proposed clause is broadly appropriate and consumer-oriented in intent, certain improvements are necessary to ensure effective implementation, legal certainty, consumer awareness, and practical enforceability.

1. Support for Uniform Nationwide Applicability

The proposal that the regulations shall apply throughout the territory of India deserves strong support from the consumer perspective.

Justification:

Telecommunication services are no longer localized utilities but constitute an essential national digital infrastructure supporting:

- banking,
- digital payments,
- e-governance,
- telemedicine,
- education,
- emergency communication,
- e-commerce,
- cybersecurity-linked authentication systems.

Consumers frequently use telecom services across Licensed Service Areas through roaming, broadband portability, OTT-linked telecom usage, and pan-India digital platforms. Therefore, fragmented or region-specific grievance frameworks would create inconsistency in consumer rights and enforcement standards.

A uniform nationwide applicability ensures:

- equal protection for all telecom consumers irrespective of geography,
- standardization of complaint handling,
- regulatory consistency,

- ease of compliance monitoring by TRAI,
- elimination of ambiguity regarding jurisdiction,
- improved transparency and accountability of service providers.

This becomes particularly important for consumers residing in:

- rural areas,
- tribal regions,
- border districts,
- aspirational districts,
- digitally underserved areas, where telecom grievance redressal systems are often weak or inaccessible.

Accordingly, the clause promoting pan-India applicability should be retained.

2. The Proposed 30-Day Commencement Period Requires Reconsideration

The draft provides that the regulations shall come into force after 30 days from publication in the Official Gazette.

While consumer organizations generally support early implementation of stronger grievance safeguards, the present amendment introduces extensive structural, technological, procedural, and compliance-related obligations upon service providers.

Justification:

The amendment mandates significant operational changes including:

- restructuring of IVRS systems,
- integration of mobile application complaint systems,
- web portal complaint filing architecture,
- multilingual complaint handling,
- complaint tracking interfaces,
- online consumer survey mechanisms,
- accessibility features for Persons with Disabilities,
- enhanced KPI reporting systems,
- complaint monitoring infrastructure,
- AI/chatbot integration,
- backend compliance reporting systems,
- revised appellate workflows.

These changes require:

- software development,
- server integration,
- cybersecurity testing,
- multilingual deployment,
- staff training,
- operational audits,
- consumer communication systems.

A rigid 30-day implementation period may result in:

- hurried and unstable implementation,
- technical failures,

- inconsistent compliance across service providers,
- increased consumer confusion,
- breakdown of complaint handling systems during migration,
- superficial “paper compliance” instead of effective consumer protection.

Poor implementation harms consumers more than phased implementation because a dysfunctional grievance system directly impacts consumers’ ability to seek timely relief.

3. Recommendation for Phased Implementation Framework

A phased implementation mechanism would better serve consumer interest while ensuring sustainable compliance.

Suggested Amendment:

“These regulations should come into force within ninety (90) days from the date of publication in the Official Gazette:

Provided that the Authority may prescribe phased implementation timelines for provisions requiring substantial technological, infrastructural, or operational modifications.

Provided further that provisions relating to complaint registration, complaint acknowledgement, accessibility for Persons with Disabilities, and appeal filing mechanisms shall be implemented within thirty (30) days.”

Justification:

This approach balances:

- consumer interest,
- implementation feasibility,
- technological readiness,
- service continuity,
- regulatory practicality.

Core consumer rights should become operational immediately, while backend technological systems may be given reasonable implementation timelines.

Such phased enforcement:

- reduces systemic disruption,
- improves implementation quality,
- prevents temporary collapse of grievance systems,
- ensures meaningful compliance,
- protects consumers from transition-related service failures.

This approach is also consistent with principles of:

- proportional regulation,
- reasonable compliance burden,
- administrative fairness,
- effective governance.

4. Need for Mandatory Consumer Awareness Prior to Enforcement

The commencement clause should additionally mandate consumer awareness measures before operational enforcement.

Justification:

A grievance redressal framework becomes meaningful only when consumers are aware of:

- their rights,
- complaint filing procedures,
- escalation mechanisms,
- appellate remedies,
- timelines,
- digital complaint platforms,
- accessibility options,
- tracking systems.

A significant percentage of telecom consumers, particularly:

- senior citizens,
- rural users,
- low-digital-literacy subscribers,
- economically weaker consumers,
- Persons with Disabilities, remain unaware of existing grievance mechanisms.

Without awareness:

- rights remain ineffective,
- complaint underreporting increases,
- service providers escape accountability,
- consumer dissatisfaction continues despite regulatory reform.

Therefore, TRAI should mandate that before commencement:

- service providers issue multilingual SMS awareness campaigns,
- complaint procedures be displayed prominently on apps and websites,
- awareness messages be included in telecom bills,
- public notices be issued through newspapers and electronic media,
- simplified consumer guides be published in regional languages.

5. Transitional Protection for Pending Complaints and Appeals

The amendment introduces major structural changes including deletion of the Advisory Committee framework and revised appellate procedures.

Justification:

In absence of transitional provisions:

- pending complaints may face procedural uncertainty,
- consumers may lose procedural safeguards,
- appeals may become delayed due to migration issues,
- disputes regarding applicable procedure may arise.

Therefore, a savings or transition clause is necessary.

Suggested Provision:

“All complaints and appeals pending on the date of commencement of these regulations shall continue under the previous framework unless the consumer opts otherwise.”

This protects:

- procedural fairness,
- continuity of justice,
- consumer expectations,
- legal certainty.

6. Need for Enhanced Regulatory Monitoring During Initial Implementation

The first six months after implementation should be treated as a regulatory transition phase.

Justification:

Large-scale grievance-system restructuring often leads to:

- complaint spikes,
- technical glitches,
- unresolved ticket migration,
- IVRS malfunction,
- delayed responses,
- inaccurate complaint categorization.

Consumers should not suffer because of implementation-stage deficiencies.

Accordingly, TRAI should:

- mandate monthly compliance reports during the first six months,
- conduct periodic audits,
- publish implementation status reviews,
- monitor unresolved complaint backlogs,
- undertake random testing of complaint systems.

This will strengthen public confidence and ensure accountability during rollout.

Concluding Consumer Position

Clause 1 is generally appropriate and consumer-oriented in spirit. However, from the standpoint of consumer welfare, regulatory effectiveness, and practical enforceability, the commencement provision requires strengthening through:

- phased implementation,
- mandatory consumer awareness,
- transitional safeguards,
- prioritization of core consumer rights,
- enhanced regulatory oversight during rollout.

A carefully structured commencement framework will ensure that the amendment functions not merely as a formal legal reform, but as a genuinely

effective, accessible, transparent, and consumer-centric grievance redressal regime capable of addressing the rapidly evolving challenges of India’s telecom ecosystem.

Comments on Clause 2 — “Applicability & Definitions”

The proposed amendments relating to Applicability and Definitions under Regulation 1(3) and Regulation 2 are broadly progressive and consumer-centric because they attempt to modernize the grievance redressal framework in line with technological evolution and the authorization-based regime introduced under the Telecommunications Act, 2023.

However, certain provisions require strengthening, clarification, and consumer-protective safeguards to ensure that the applicability framework does not create regulatory gaps, uneven consumer protection, or ambiguity in enforcement.

I. COMMENTS ON APPLICABILITY PROVISIONS

(Regulation 1(3))

1. Broad Applicability to All Access and Internet Service Providers is Supported

The proposed expansion of applicability to:

- Unified Access Service Licence holders,
- Unified Licence holders,
- Internet Service Authorization holders,

- entities operating under authorization under the Telecommunications Act, 2023,

is strongly supported from the consumer perspective.

Justification:

Telecommunication services today are technology-neutral and platform-integrated. Consumers do not distinguish between:

- telecom licensees,
- authorization holders,
- broadband providers,
- wireless providers,
- internet-based telecom platforms.

From the consumer standpoint, the essential issue is whether:

- the service works properly,
- complaints are resolved,
- billing is fair,
- grievance mechanisms function effectively.

Therefore, all entities providing telecom connectivity or internet access should be uniformly subject to consumer grievance obligations.

This amendment appropriately closes possible regulatory gaps arising due to transition from the licensing regime under the Indian Telegraph Act, 1885 to the authorization framework under the Telecommunications Act, 2023.

Without such harmonization:

- consumers may face confusion regarding applicable grievance forums,
- entities may attempt regulatory arbitrage,
- accountability may weaken during legal transition.

Hence, the widened applicability framework should be retained.

2. Concern Regarding Voluntary Compliance for Small ISPs

The amendment proposes that smaller ISPs below the subscriber threshold may voluntarily follow the regulations.

This provision requires reconsideration from the consumer protection perspective.

Justification:

Consumers purchasing services from smaller ISPs are equally entitled to:

- fair complaint handling,
- timely grievance resolution,
- billing transparency,
- access to appellate mechanisms.

Consumer rights cannot depend solely upon:

- size of service provider,
- subscriber base,
- turnover.

In many rural and semi-urban areas, small ISPs are the primary providers of internet services. Exempting them from mandatory compliance may create:

- unequal consumer protection,
- regulatory fragmentation,
- consumer exploitation risks,
- absence of formal complaint systems.

Further, internet connectivity has now become an essential digital utility affecting:

- education,
- telemedicine,
- digital payments,
- governance services,
- emergency communication.

Therefore, weaker protection for consumers of small ISPs would be contrary to the principles of digital inclusion and equitable consumer rights.

Suggested Amendment

Instead of complete voluntary compliance, TRAI may adopt a phased proportional compliance model.

Suggested Text:

“Provided that Internet Service Providers having subscriber base below the prescribed threshold shall comply with minimum mandatory grievance

redressal obligations including complaint registration, complaint acknowledgement, escalation mechanism, and timeline disclosure.”

Justification:

This approach balances:

- consumer protection,
- operational feasibility,
- proportional compliance burden.

Basic grievance safeguards should never become optional.

II. COMMENTS ON DEFINITIONS

(Regulation 2)

3. Definition of “Access Service” Requires Consumer-Centric Expansion

The revised definition of “Access Service” is broadly appropriate.

However, the definition should explicitly recognize:

- digital communication interfaces,
- IP-enabled communication,
- emerging telecom technologies,
- integrated broadband communication ecosystems.

Justification:

Telecom services are rapidly evolving toward:

- IP-based communication,
- app-integrated telecom services,
- hybrid telecom-data services,
- cloud communication frameworks.

A narrow interpretation may later create disputes regarding:

- applicability,
- complaint jurisdiction,
- consumer rights over emerging telecom services.

Accordingly, the definition should remain technology-neutral and future-ready.

4. Definition of “Complaint Monitoring System” Requires Stronger Transparency Obligations

The proposed insertion of “Complaint Monitoring System” is welcome.

Justification:

A robust complaint monitoring system is essential for:

- transparency,
- accountability,
- auditability,
- consumer trust.

However, the current definition focuses primarily on system architecture rather than consumer rights.

The definition should additionally require:

- real-time complaint tracking,
- complaint history visibility,
- downloadable complaint records,
- timestamped actions,
- escalation visibility,
- audit logs.

Without such safeguards:

- complaints may be closed arbitrarily,
- complaint history may disappear,
- consumers may lack documentary evidence.

Suggested Addition

“The Complaint Monitoring System shall provide consumers real-time status visibility, complaint history, timestamped actions, escalation tracking, and downloadable records.”

Justification:

This strengthens:

- evidentiary transparency,

- audit integrity,
- regulatory oversight,
- consumer confidence.

5. Definition of “Grievance Redressal Mechanism” Should Include Accountability Principles

The insertion of the term “Grievance Redressal Mechanism” is appropriate.

However, the definition currently emphasizes only structural interworking.

Justification:

A consumer-centric grievance mechanism must also embody:

- fairness,
- transparency,
- accessibility,
- accountability,
- non-discrimination,
- time-bound action.

Without incorporating these principles, service providers may maintain technically compliant systems that remain practically ineffective.

Suggested Addition

“The Grievance Redressal Mechanism shall operate in a fair, transparent, accessible, accountable, and time-bound manner.”

Justification:

This aligns the regulation with:

- natural justice principles,
- digital governance standards,
- constitutional fairness obligations,
- consumer protection objectives.

6. Definition of “Service Query” Should Not Be Used to Downgrade Complaints

The insertion of “Service Query” is useful for categorization purposes.

However, there is a serious consumer risk that service providers may deliberately classify genuine complaints as mere “queries” to:

- avoid complaint timelines,
- reduce reported complaint numbers,
- avoid regulatory scrutiny,
- manipulate KPI statistics.

Justification:

Telecom operators often use categorization practices to dilute complaint statistics.

Therefore, the regulation should clearly distinguish:

- informational queries,

- service requests,
- actual complaints.

Suggested Safeguard

“No complaint involving billing dispute, service deficiency, network failure, unauthorized activation, tariff issue, or consumer harm shall be categorized merely as a Service Query.”

Justification:

This prevents:

- complaint suppression,
- KPI manipulation,
- artificial reduction of complaint data,
- weakening of consumer rights.

7. Definition of “Survey” Requires Independence and Safeguards

The proposed online consumer survey mechanism is progressive.

However, the definition should incorporate safeguards against manipulation.

Justification:

Consumer satisfaction surveys conducted solely by service providers may suffer from:

- selective triggering,

- coercive closure,
- biased survey design,
- non-neutral presentation,
- suppression of dissatisfied responses.

Hence, TRAI should prescribe:

- standardized survey formats,
- neutral language,
- mandatory random audits,
- retention of raw survey data,
- anti-manipulation safeguards.

8. Deletion of “Advisory Committee” Definition Raises Consumer Representation Concerns

The deletion of the “Advisory Committee” definition reflects the proposed removal of the committee framework.

While simplification of appeal procedures may improve speed, complete elimination of independent consumer representation creates concerns.

Justification:

The Advisory Committee previously provided:

- consumer representation,
- independent scrutiny,
- participatory accountability,

- external oversight.

Its removal may increase:

- concentration of decision-making within service providers,
- risk of biased appellate decisions,
- absence of independent consumer voice.

Instead of total removal, TRAI should consider:

- digital advisory consultation,
- virtual participation,
- panel-based oversight,
- consumer ombudsman models.

9. Definition of “Service Provider” Should Include Responsibility for Outsourced Agencies

The revised definition of “Service Provider” is acceptable.

However, telecom companies increasingly outsource:

- customer care,
- field support,
- billing,
- complaint handling,
- digital support systems.

Suggested Clarification:

“Service Provider shall remain fully responsible for acts and omissions of outsourced agencies, contractors, franchisees, and digital grievance platforms.”

Justification:

Without such clarification:

- accountability may become diffused,
- service providers may blame third-party vendors,
- consumers may face denial of liability.

Ultimate accountability must remain with the licensed/authorized entity.

Concluding Consumer Position

The proposed amendments relating to Applicability and Definitions are broadly progressive and necessary for modernization of the telecom grievance redressal framework. However, stronger consumer safeguards are required to ensure that:

- regulatory modernization does not dilute accountability,
- small ISP consumers are not left under-protected,
- complaint categorization is not misused,
- grievance systems remain transparent and auditable,
- consumer representation is preserved,
- technology evolution does not create regulatory loopholes.

A strong definitional framework is essential because definitions determine:

- scope of consumer rights,
- jurisdiction,
- accountability,
- enforceability,
- future interpretation of the entire regulatory regime.

Therefore, the definitions under the proposed amendment should be interpreted and strengthened in a manner that maximizes consumer protection, transparency, accessibility, and regulatory accountability.

Comments on Clause 3 — “Complaint Centre, IVRS, Digital Channels, and Accessibility for Persons with Disabilities (PwDs)”

The proposed amendments under Clause 3 relating to Complaint Centres, IVRS architecture, digital grievance channels, AI-enabled systems, and accessibility for Persons with Disabilities (PwDs) are among the most significant consumer-centric reforms in the draft regulation.

The amendments recognize the transformation of telecom services from traditional voice-centric systems to digitally integrated, app-based, always-on communication ecosystems. From the standpoint of consumers, these provisions substantially improve:

- accessibility,
- transparency,
- convenience,
- responsiveness,

- inclusivity,
- grievance traceability.

However, certain provisions require additional safeguards to prevent misuse, technological exclusion, automated denial of grievances, and digital discrimination.

I. COMMENTS ON COMPLAINT CENTRES

1. Support for 24×7 Complaint Centre Accessibility

The amendment proposing round-the-clock accessibility of Complaint Centres is strongly supported.

Justification:

Telecommunication services have become critical public utilities supporting:

- banking transactions,
- digital identity verification,
- emergency communication,
- telemedicine,
- e-governance,
- remote education,
- business operations,
- disaster response systems.

Service disruptions occurring at night can have severe consequences including:

- financial losses,
- inability to access emergency services,
- authentication failures,
- interruption of healthcare services,
- cybersecurity risks.

Consumers therefore require grievance access on a 24×7 basis.

The earlier framework restricting accessibility between 0800 hrs and 2400 hrs no longer reflects present digital realities.

The proposed amendment appropriately recognizes that telecom connectivity is now an essential continuous service.

2. Need for Mandatory Human Escalation Availability

The provision requiring access to a human customer care representative within IVRS and digital systems is highly consumer-friendly.

Justification:

One of the largest consumer grievances today is:

- endless IVRS loops,
- inability to reach human support,
- automated complaint closure,
- chatbot dependency,
- scripted responses without resolution.

Consumers frequently face frustration because:

- automated systems cannot understand complex grievances,
- elderly consumers struggle with IVRS navigation,
- rural consumers face language barriers,
- AI systems often misclassify complaints.

Therefore, mandatory human escalation is essential for:

- fairness,
- accountability,
- effective dispute resolution,
- consumer trust.

Suggested Strengthening

“Every consumer shall have the right to connect with a human representative within a reasonable waiting period not exceeding three minutes.”

Justification:

Without measurable standards:

- operators may technically comply while practically denying human access,
- consumers may remain trapped in automated systems,
- complaint fatigue may discourage grievance filing.

II. COMMENTS ON IVRS ARCHITECTURE

3. Standardized IVRS Structure is Strongly Supported

The standardized multi-level IVRS framework is a positive reform.

Justification:

Presently, telecom operators maintain inconsistent IVRS structures causing:

- consumer confusion,
- delayed complaint registration,
- misrouting of grievances,
- increased abandonment rates.

Standardization improves:

- ease of navigation,
- procedural predictability,
- consumer convenience,
- auditability of complaint systems.

The explicit categorization into:

- Complaints,
- Appeals,
- Service Requests/Queries, is particularly beneficial.

4. IVRS Depth Should Be Limited

While the structure is welcome, the regulation should impose a maximum navigation depth.

Justification:

Consumers are often subjected to:

- excessively layered menus,
- long audio advertisements,
- repetitive promotional messages,
- hidden complaint options.

This results in:

- denial of effective access,
- frustration,
- abandoned complaints.

Suggested Addition

“No consumer should be required to navigate beyond three IVRS levels before reaching complaint registration or human assistance.”

Justification:

This prevents:

- artificial complexity,
- delay tactics,
- complaint suppression by design.

5. Promotional Messages Should Not Obstruct Complaint Filing

The regulation should prohibit forced promotional announcements before complaint access.

Justification:

Many operators currently:

- play advertisements,
- force promotional listening,
- delay access to complaint options.

This is unfair because grievance redressal is a statutory consumer right, not a marketing opportunity.

Suggested Provision

“Complaint access through IVRS shall not be delayed by promotional or marketing content exceeding ten seconds.”

III. COMMENTS ON DIGITAL CHANNELS

(Web Portals, Mobile Apps, AI Systems)

6. Mandatory Digital Complaint Channels are Strongly Supported

The requirement for complaint filing through:

- websites,
- portals,
- mobile applications,

is highly consumer-centric.

Justification:

Modern consumers increasingly rely upon:

- app-based interaction,
- digital self-service,
- asynchronous communication,
- online complaint tracking.

Digital channels provide:

- documentary evidence,
- complaint traceability,
- transparency,
- reduced dependency on call centres.

This is especially useful for:

- working professionals,
- hearing-impaired users,
- consumers in noisy environments,
- broadband users,
- digitally literate youth.

7. Complaint Tracking Visibility Must Be Mandatory

The amendment requiring status updates is strongly appreciated.

However, stronger transparency obligations are needed.

Suggested Addition

Consumers should have access to:

- complaint timestamps,
- assigned department,
- escalation history,
- officer handling status,
- expected resolution timeline,
- closure reason.

Justification:

Without visibility:

- complaints may be silently closed,
- consumers may lose evidence,
- accountability becomes weak.

Complaint tracking should function similarly to:

- courier tracking systems,
- banking dispute systems,
- e-commerce grievance dashboards.

8. Voice Note Facility is Highly Consumer-Friendly

The provision permitting voice-note-based grievance submission is progressive.

Justification:

This benefits:

- semi-literate consumers,
- elderly consumers,
- regional language users,
- visually impaired consumers,
- consumers unable to type lengthy complaints.

This improves inclusivity and reduces digital barriers.

IV. COMMENTS ON AI, CHATBOTS, AND AUTOMATED SYSTEMS

9. AI-Based Grievance Systems Require Strong Consumer Safeguards

The draft permits usage of:

- chatbots,
- AI agents,
- new-age customer support solutions.

While innovation is welcome, strong safeguards are essential.

Justification:

AI systems may:

- misclassify complaints,
- generate inaccurate responses,
- deny escalation,
- create opaque decision-making,
- disproportionately disadvantage vulnerable users.

Consumers should never be forced into AI-only grievance systems.

Suggested Safeguards

“AI or chatbot systems shall not independently close complaints without human verification.”

“Consumers shall have an unconditional right to human escalation.”

“Automated decisions materially affecting complaint disposal shall remain reviewable by human representatives.”

Justification:

This protects consumers against:

- algorithmic opacity,
- automated injustice,
- denial of due process.

V. COMMENTS ON PwD ACCESSIBILITY

10. PwD Accessibility Provisions are Strongly Supported

The inclusion of dedicated accessibility provisions for Persons with Disabilities is one of the most progressive aspects of the draft.

Justification:

Digital access is now inseparable from:

- constitutional dignity,
- equality,
- right to life,
- access to essential services.

PwDs often face:

- inaccessible IVRS systems,
- non-readable mobile apps,
- inability to communicate complaints,
- lack of assistive support.

The proposed provisions appropriately recognize accessibility as a consumer right rather than a welfare measure.

11. Accessibility Standards Should Be Specifically Mandated

The regulation currently refers generally to Government guidelines.

More specific compliance obligations are required.

Suggested Addition

Service providers should comply with:

- WCAG accessibility standards,
- screen-reader compatibility,
- voice navigation systems,
- sign-language support where feasible,
- accessible CAPTCHA alternatives,
- high-contrast visual modes,
- text resizing capability.

Justification:

Generic references may result in inconsistent implementation.

Specific standards improve:

- enforceability,
- auditability,
- measurable compliance.

12. Dedicated PwD Helpline Should Be Mandatory

The regulation should mandate:

- priority routing,
- dedicated helplines,
- reduced waiting time,
- trained accessibility support personnel.

Justification:

PwD consumers often face disproportionate difficulty in:

- complaint registration,
- authentication,
- escalation.

Accessibility support should therefore be specialized rather than merely symbolic.

VI. COMMENTS ON DATA PROTECTION AND DIGITAL RIGHTS**13. Digital Complaint Platforms Must Ensure Privacy Protection**

The regulation should include explicit obligations regarding:

- complaint data security,
- voice-note privacy,
- AI data usage,
- retention safeguards,
- cyber protection.

Justification:

Complaint systems may collect sensitive data including:

- financial details,
- identity information,
- location data,

- usage records.

Without safeguards:

- consumer privacy risks increase,
- data misuse becomes possible.

VII. CONCLUDING CONSUMER POSITION

Clause 3 represents a major modernization of the telecom grievance ecosystem and is strongly supported in principle. The proposed reforms significantly improve:

- accessibility,
- digital convenience,
- procedural transparency,
- inclusivity,
- consumer empowerment.

However, the regulation should be strengthened through:

- mandatory human escalation rights,
- limits on IVRS complexity,
- anti-automation safeguards,
- transparency obligations,
- measurable accessibility standards,
- protection against complaint suppression,
- privacy and cybersecurity safeguards.

If strengthened appropriately, Clause 3 can become one of the most important consumer-centric telecom grievance reforms introduced in India’s digital communications sector.

Comments on Clause 4 — “Consumer Information & Consumer Corner”

The proposed amendments relating to publication of consumer information, multilingual disclosure obligations, mobile application visibility, and establishment of a “Consumer Corner” are highly progressive and strongly consumer-oriented.

These provisions recognize that consumer protection is not limited merely to grievance resolution, but also includes:

- transparency,
- accessibility of information,
- awareness of rights,
- informed decision-making,
- visibility of accountability mechanisms.

In the telecom sector, information asymmetry between telecom operators and consumers remains one of the largest structural barriers to effective consumer protection. Therefore, stronger disclosure obligations are essential.

However, certain safeguards and enhancements are necessary to ensure that the “Consumer Corner” becomes a meaningful public accountability mechanism rather than merely a symbolic compliance feature.

I. COMMENTS ON MULTILINGUAL CONSUMER INFORMATION

1. Mandatory Publication in Hindi, English, and Official State Languages is Strongly Supported

The amendment requiring publication of consumer information in:

- Hindi,
- English,
- official language(s) of the state(s) in the Licensed Service Area,

is strongly supported.

Justification:

Telecom services are mass public services used by consumers across:

- rural areas,
- tribal populations,
- semi-urban regions,
- elderly populations,
- digitally less-literate users.

Many consumers are unable to:

- understand English-language legal terminology,
- navigate grievance systems,
- interpret tariff disclosures,
- comprehend complaint escalation rights.

Use of official regional languages improves:

- consumer awareness,
- inclusivity,
- procedural accessibility,
- effective exercise of rights.

It also aligns with:

- constitutional linguistic principles,
- digital inclusion objectives,
- consumer empowerment goals.

The earlier use of the term “local language” was ambiguous and inconsistently implemented.

The revised formulation is therefore a welcome clarification.

II. COMMENTS ON “CONSUMER CORNER”

2. Establishment of “Consumer Corner” is a Major Consumer-Centric Reform

The requirement that every service provider maintain a prominently visible “Consumer Corner” on the homepage is strongly welcomed.

Justification:

At present, consumers often struggle to locate:

- complaint procedures,
- appellate authority details,
- timelines,
- escalation channels,
- service rights,
- performance reports.

Many operators:

- bury complaint links deep within websites,
- prioritize marketing over grievance visibility,
- use confusing navigation systems.

A mandatory Consumer Corner directly improves:

- transparency,
- ease of access,
- accountability,
- visibility of consumer rights.

This reform shifts telecom governance from:

- operator-centric information architecture to
- consumer-centric information architecture.

3. Consumer Corner Should Be Mandatory Across All Platforms

While the draft refers to websites and apps, stronger uniformity is needed.

Suggested Addition

“The Consumer Corner shall be prominently accessible through:

- website homepage,
- mobile applications,
- customer dashboards,
- login pages,
- telecom self-care portals.”

Justification:

Many consumers interact exclusively through:

- mobile apps,
- digital dashboards,
- self-care interfaces.

Consumer rights should not remain hidden behind multiple navigation layers.

III. COMMENTS ON TRANSPARENCY AND ACCOUNTABILITY

4. Publication of Complaint and Appeal Statistics is Strongly Supported

The proposal requiring publication of:

- Consumer Satisfaction Survey reports,
- Quarterly Performance Reports (QPRs),

is highly consumer-centric.

Justification:

Transparency in grievance performance creates:

- public accountability,
- reputational pressure,
- informed consumer choice,
- comparative evaluation among operators.

Currently, consumers have almost no visibility into:

- complaint disposal efficiency,
- average resolution timelines,
- unresolved complaints,
- appeal outcomes,
- consumer satisfaction levels.

Mandatory publication transforms grievance data into a public accountability instrument.

This may encourage:

- competitive improvement,
- service quality enhancement,
- consumer-centric governance.

5. Raw Data Disclosure Should Be Standardized

The regulation should prescribe standardized disclosure formats.

Justification:

Without uniform reporting formats:

- operators may selectively present favorable data,
- comparisons become difficult,
- transparency becomes cosmetic.

Suggested Provision

“TRAI should prescribe a standardized public disclosure template for Consumer Corner disclosures.”

Justification:

This enables:

- comparability,
- independent analysis,
- consumer research,
- public oversight,
- regulatory benchmarking.

IV. COMMENTS ON CONSUMER EDUCATION**6. Consumer Corner Should Include “Know Your Rights” Section**

The draft should explicitly require publication of consumer rights.

Suggested Addition

The Consumer Corner should contain:

- complaint filing rights,
- appeal rights,
- tariff rights,
- VAS deactivation rights,
- refund rules,
- network outage rights,
- spam complaint rights,
- compensation provisions,
- QoS benchmarks.

Justification:

Most telecom consumers remain unaware of:

- available remedies,
- escalation rights,
- statutory timelines,
- regulatory protections.

Consumer protection becomes ineffective if rights are unknown.

The Consumer Corner should therefore function not merely as a complaint page, but as a digital consumer rights charter.

V. COMMENTS ON ACCESSIBILITY AND DIGITAL INCLUSION

7. Consumer Corner Should Be Fully Accessible to Persons with Disabilities

The regulation should explicitly require:

- screen-reader compatibility,
- text resizing,
- high-contrast modes,
- keyboard navigation,
- voice-assisted navigation.

Justification:

Accessibility is a constitutional and digital inclusion issue.

PwD consumers should not face barriers in accessing:

- complaint systems,
- rights information,
- escalation mechanisms.

Consumer information accessibility is as important as complaint accessibility.

VI. COMMENTS ON SEARCHABILITY AND VISIBILITY

8. Consumer Information Should Not Be Hidden Through Dark Patterns

The regulation should prohibit:

- deceptive interface designs,
- hidden complaint links,
- misleading navigation,
- complaint suppression architecture.

Justification:

Some operators deliberately:

- prioritize promotional content,
- obscure complaint channels,
- create confusing menus,
- reduce visibility of escalation options.

This undermines effective consumer access.

Suggested Provision

“Consumer information and grievance links shall not be concealed, deprioritized, or obscured through interface design practices.”

VII. COMMENTS ON UPDATION AND AUTHENTICITY

9. Consumer Corner Information Must Be Continuously Updated

The regulation should mandate:

- periodic updating,
- timestamped disclosures,
- archival access to previous reports.

Justification:

Outdated information may:

- mislead consumers,
- impair grievance filing,
- obstruct escalation.

Consumers should know:

- whether information is current,
- whether complaint authorities remain valid,
- whether timelines have changed.

Suggested Provision

“All Consumer Corner disclosures shall contain last updated timestamps.”

VIII. COMMENTS ON MOBILE APPLICATION INTEGRATION**10. Mandatory Mobile App Disclosure is Strongly Supported**

The amendment extending disclosure obligations to mobile applications is highly consumer-friendly.

Justification:

Modern telecom consumers increasingly use:

- self-care apps,
- mobile dashboards,

- digital payment interfaces.

Many consumers never visit websites.

Therefore:

- complaint rights,
- escalation systems,
- consumer information, must remain fully accessible through apps.

This significantly improves:

- convenience,
- accessibility,
- real-time grievance interaction.

IX. COMMENTS ON PUBLIC ACCOUNTABILITY

11. TRAI Should Create Centralized Public Consumer Dashboard

The regulation should additionally empower TRAI to create a centralized public dashboard aggregating:

- complaint performance,
- consumer satisfaction,
- operator-wise statistics,
- appeal disposal rates.

Justification:

Currently, consumers cannot easily compare:

- operator grievance efficiency,
- complaint responsiveness,
- resolution quality.

Public benchmarking would:

- improve competition,
- incentivize compliance,
- strengthen accountability.

X. CONCLUDING CONSUMER POSITION

Clause 4 relating to Consumer Information and Consumer Corner is one of the most transparency-oriented reforms in the proposed amendment and is strongly supported from the consumer perspective.

The amendments appropriately recognize that:

- informed consumers are empowered consumers,
- transparency is essential for accountability,
- visibility of rights is central to effective grievance redressal.

However, the provisions should be strengthened through:

- standardized disclosure formats,
- mandatory rights education,
- anti-dark-pattern safeguards,

- accessibility requirements,
- real-time updating obligations,
- stronger public transparency architecture.

If implemented effectively, the proposed Consumer Corner framework can become a transformative public accountability mechanism in India’s telecom sector by making grievance systems more transparent, accessible, measurable, and consumer-centric.

Clause 5 – Complaint Monitoring System

Consumer Complaints at a glance :

Annexure: Classification of Telecom Consumer Complaints

Table: Standardized Classification Framework for Telecom Consumer Complaints

Sr. No.	Primary Category	Sub-Category	Nature of Complaints	Illustrative Issues Reported by Consumers	Regulatory Relevance (TRAI Framework)
1	Infrastructure-Related Issues	Network Infrastructure	Deficiencies in telecom network deployment and coverage	Poor signal strength, call drops, no network, lack of 4G/5G availability, indoor coverage issues	QoS Regulations (Network Availability, Call Drop Norms)
		Transmission	Failures in	Fiber cuts, high	QoS +

Sr. No.	Primary Category	Sub-Category	Nature of Complaints	Illustrative Issues Reported by Consumers	Regulatory Relevance (TRAI Framework)
		& Backhaul	backbone connectivity systems	latency, packet loss, network outage during peak hours	Network Performance Monitoring
		Power & Physical Infrastructure	Site-level operational failures	Tower shutdown due to power failure, DG/battery backup failure	Infrastructure Reliability Norms
		Capacity & Spectrum Constraints	Network congestion due to inadequate capacity	Slow data speed during peak hours, call blocking	Spectrum Efficiency & QoS Compliance
2	Service Quality (QoS) Issues	Voice Services	Quality degradation in voice communication	Call drops, echo, one-way voice, call setup failure	QoS (Voice Call Quality Standards)
		Data Services	Deficiency in mobile internet services	Slow internet, buffering, frequent disconnection	QoS (Data Speed & Latency Norms)
		Broadband/FTTH	Fixed-line service issues	No connectivity, frequent	Broadband QoS Regulation

Sr. No.	Primary Category	Sub-Category	Nature of Complaints	Illustrative Issues Reported by Consumers	Regulatory Relevance (TRAI Framework)
				downtime, speed mismatch with plan	s
3	Commercial & Billing Issues	Billing Errors	Financial discrepancies in billing	Excess billing, incorrect charges, duplicate billing	Tariff Orders & Consumer Protection
		Tariff Transparency	Lack of clarity in pricing	Misleading “unlimited” plans, hidden FUP limits	Tariff Regulation Compliance
		Refund & Deposit	Delay or denial of refunds	Non-refund of security deposit, wrongful deductions	Consumer Protection Regulations
4	Unsolicited Communications (UCC)	Spam Calls	Unwanted voice communications	Telemarketing calls despite DND registration	TCCCPR, 2018
		Spam SMS	Unsolicited messages	Promotional/fraud SMS	TCCCPR, 2018
		Fraud Communicati	Scam-related communicati	Phishing calls, OTP fraud,	Consumer Safety &

Sr. No.	Primary Category	Sub-Category	Nature of Complaints	Illustrative Issues Reported by Consumers	Regulatory Relevance (TRAI Framework)
		ons	ons	impersonation	Anti-Fraud Framework
5	Complaint Handling & Redressal Issues	Complaint Registration	Barriers in lodging complaints	IVRS complexity, non-functional apps/portals	TCCRR Regulations
		Resolution Deficiency	Improper complaint closure	Complaint closed without resolution, repeated complaints	TCCRR (Complaint Lifecycle)
		Appellate Mechanism	Ineffective escalation	Delay in appeals, lack of independence	TCCRR (Appellate Authority Provisions)
6	Digital Platform Issues	App/Portal Functionality	Failure of digital grievance systems	App crash, login failure, complaint tracking issues	Digital Complaint Systems (New TCCRR Amendments)
		AI/Chatbot Systems	Inefficiency in automated systems	No human escalation, irrelevant responses	Emerging Regulatory Concern

Sr. No.	Primary Category	Sub-Category	Nature of Complaints	Illustrative Issues Reported by Consumers	Regulatory Relevance (TRAI Framework)
7	Regulatory Compliance Issues	QoS Violations	Non-adherence to service benchmarks	Call drop beyond limits, poor network performance	QoS Regulations
		MNP Issues	Issues in number portability	Delay, rejection without reason	MNP Regulations
		Consumer Information	Lack of transparency	Non-display of consumer rights, charter	Consumer Awareness Norms
8	Accessibility & Inclusion Issues	PwD Accessibility	Lack of inclusive systems	Services not accessible for disabled users	Accessibility Mandates
		Language Barriers	Lack of regional language support	Complaint systems only in English/Hindi	Consumer Inclusion Policies
		Digital Divide	Exclusion of rural/elderly users	Difficulty using apps/online systems	Digital Inclusion Policy
9	Security & Privacy Issues	Data Privacy	Misuse of personal data	Unauthorized sharing of user data	Data Protection & Telecom Security
		SIM & Identity	Identity	SIM swap fraud, KYC	Telecom Security

Sr. No.	Primary Category	Sub-Category	Nature of Complaints	Illustrative Issues Reported by Consumers	Regulatory Relevance (TRAI Framework)
		Fraud	misuse	misuse	Framework
10	Value Added Services (VAS) Issues	Unauthorized Activation	Services activated without consent	Caller tunes, subscriptions auto-activated	Consumer Consent Norms
		Deactivation Issues	Difficulty in stopping services	Delayed deactivation, continued billing	Consumer Protection

Suggested Additional Classification Layer (For TRAI Consideration)

Category Type	Description
Infrastructure-Driven Complaints	Complaints arising due to network, capacity, or physical infrastructure deficiencies
Service Delivery Complaints	Complaints related to quality of voice/data services
Process & Redressal Complaints	Complaints arising due to inefficiencies in grievance handling
Commercial Complaints	Billing, tariff, and financial disputes
Security & Consumer Protection Complaints	Fraud, spam, and privacy violations

Policy Recommendations with Legal and Regulatory Backing

1. Reclassification of Consumer Complaints into Infrastructure and Non-Infrastructure Categories

It is respectfully submitted that the present complaint redressal framework does not distinguish between infrastructure-driven deficiencies and service/process-related complaints, resulting in regulatory opacity and ineffective enforcement.

TRAI, in exercise of its powers under Section 11(1)(b)(i) and (v) of the TRAI Act, 1997, is mandated to ensure:

- compliance with quality of service standards, and
- protection of consumer interest.

Accordingly, it is recommended that:

- A mandatory bifurcation of complaints into:
 - Infrastructure-related complaints (network coverage, congestion, fiber cuts, etc.)
 - Non-infrastructure complaints (billing, customer service, etc.)

be introduced in the Quarterly Performance Reports (QPRs).

Rationale: Infrastructure deficiencies directly reflect operator investment obligations, and their masking under general complaint categories undermines regulatory oversight.

2. Introduction of “True Resolution Rate” in place of “Closure Rate”

At present, service providers report complaints disposed/closed, which does not reflect actual consumer satisfaction.

The Draft Regulation itself recognizes the need for consumer feedback on a 1–5 satisfaction scale.

Therefore, it is recommended that:

- TRAI mandate reporting of:
 - “True Resolution Rate” = Percentage of complaints rated 4 or 5 by consumers
 - Separate disclosure for:
 - Complaints
 - Appeals

Legal Basis:

- Section 11(1)(b)(v) – Protection of consumer interest
- Principle of Natural Justice – A complaint cannot be deemed resolved without satisfaction of the aggrieved party

Rationale: Closure without satisfaction amounts to procedural compliance but substantive failure.

3. Mandatory Disclosure of Repeat Complaint Index (RCI)

A significant regulatory gap exists wherein repeated complaints on the same issue are not tracked, allowing systemic deficiencies to persist unnoticed.

It is recommended that:

- TRAI introduce a Repeat Complaint Index (RCI) defined as:
 - Number of complaints filed by the same consumer for the same issue within a defined period
- RCI must be:
 - Reported operator-wise
 - Linked to penalty thresholds

Legal Basis:

- Section 11(1)(b)(i) – Ensuring technical compatibility and effective service delivery
- Persistent issues indicate failure of compliance with QoS norms

4. Strengthening Independence and Accountability of Appellate Authority

The proposed framework allows Appellate Authority to be an employee of the service provider, which raises concerns regarding institutional bias.

It is recommended that:

- Appointment of Appellate Authority should:
 - Ensure functional independence
 - Include external oversight mechanism, or
 - Be subject to periodic audit by TRAI

Legal Basis:

- Doctrine of Fair Hearing (Audi Alteram Partem)
- Consumer Protection Act, 2019 – Right to fair adjudication

Rationale: An internal authority adjudicating against its own organization compromises consumer confidence and natural justice.

5. Mandatory Human Escalation Mechanism in Digital Complaint Systems

While digital platforms (apps, chatbots, IVRS) improve accessibility, over-reliance on automated systems may deny effective grievance redressal, especially for vulnerable consumers.

It is recommended that:

- Every complaint system must include:
 - Mandatory human escalation option
 - Defined maximum response time for human intervention

Legal Basis:

- Right to Access Justice under constitutional principles
- TRAI's consumer protection mandate

Rationale: Algorithmic decision-making cannot replace human adjudication in grievance matters.

6. Strengthening Financial Disincentives for Non-Compliance

The proposed penalties (₹1,000 / ₹5,000) may not act as effective deterrents for large telecom operators.

It is recommended that:

- Financial disincentives should be:
 - Proportionate to the scale of violation
 - Linked with:
 - Number of affected consumers
 - Duration of non-resolution
 - Repeat violations

Legal Basis:

- Principle of Proportionality in Regulatory Enforcement

Rationale: Nominal penalties risk becoming cost of doing business, rather than deterrents.

7. Special Protection for Vulnerable Consumers (Elderly, Rural, PwD)

Digital-first complaint systems risk excluding:

- Elderly consumers
- Rural population
- Persons with Disabilities (PwD)

It is recommended that:

- Service providers must:

- Provide offline complaint mechanisms
- Ensure regional language support
- Establish dedicated assistance channels for PwD

Legal Basis:

- Rights of Persons with Disabilities Act, 2016
- Constitutional principles of equality (Article 14)

8. Linking Complaint Data with Network Investment Obligations

It is submitted that repeated infrastructure-related complaints indicate deficiency in network planning and investment.

It is recommended that:

- TRAI should:
 - Map complaint data geographically
 - Mandate time-bound infrastructure augmentation in high-complaint zones

Legal Basis:

- Section 11(1)(b)(i) – Ensuring compliance with QoS standards

Rationale: Complaint data should serve as a regulatory trigger for network improvement, not merely reporting.

9. Mandatory Public Disclosure of Consumer Satisfaction Scores

Transparency is essential for informed consumer choice.

It is recommended that:

- Operator-wise publication of:
 - Complaint resolution rates
 - Consumer satisfaction scores
 - Repeat complaint index

be made publicly available on TRAI and operator websites.

Legal Basis:

- Right to Information principles
- TRAI’s mandate for transparency and consumer awareness

Concluding Submission

In conclusion, it is respectfully submitted that the proposed regulatory framework, while progressive, must evolve from a process-oriented compliance system to a consumer outcome-oriented regulatory regime.

The focus must shift from:

- “Complaints Closed” → “Complaints Resolved to Consumer Satisfaction”

Only then can the objectives of:

- Consumer Protection

- Service Quality Improvement
- Trust in Telecom Ecosystem

be meaningfully achieved.

Comments on Clause 5 — “Complaint Monitoring System”

The proposed amendments relating to the Complaint Monitoring System (CMS) under Regulation 6 are highly significant and represent one of the core structural reforms in the proposed grievance redressal framework.

The draft appropriately recognizes that modern telecom grievance redressal cannot function effectively without:

- real-time digital monitoring,
- complaint traceability,
- transparent workflow systems,
- audit-ready architecture,
- continuous consumer communication.

The proposed provisions substantially strengthen:

- accountability,
- transparency,
- consumer visibility,
- grievance tracking,
- regulatory oversight.

However, from a consumer protection perspective, additional safeguards are necessary to ensure that the Complaint Monitoring System becomes a genuinely consumer-centric accountability infrastructure rather than merely an internal operational software platform.

I. GENERAL CONSUMER POSITION ON COMPLAINT MONITORING SYSTEM

1. Strong Support for Mandatory Complaint Monitoring System

The proposal requiring all service providers to establish a web-based or similar architecture-based Complaint Monitoring System is strongly supported.

Justification:

Telecom consumers today frequently face:

- complaint disappearance,
- repeated complaint registration,
- inconsistent responses,
- lack of traceability,
- denial of prior interactions,
- arbitrary closure of complaints.

A centralized Complaint Monitoring System is essential because it:

- creates an auditable digital trail,
- prevents complaint suppression,

- improves accountability,
- enhances transparency,
- enables evidence-based regulatory supervision.

This reform is especially important considering the rapidly increasing volume of telecom complaints noted in the Explanatory Memorandum.

The CMS framework therefore deserves strong support.

II. COMMENTS ON SYSTEM ARCHITECTURE

2. Technology-Neutral Architecture Approach is Appropriate

The amendment replacing the earlier narrow terminology “Web Based Complaint Monitoring System” with broader language such as:

“world wide web based client server architecture or other similar architecture-based Complaint Monitoring System”

is appropriate and future-ready.

Justification:

Telecom technology ecosystems are rapidly evolving toward:

- cloud-based systems,
- AI-assisted platforms,
- app-based architectures,
- distributed systems,
- omnichannel interfaces.

A technology-neutral framework prevents:

- regulatory obsolescence,
- interpretational disputes,
- limitation of innovation.

This ensures long-term adaptability while maintaining consumer protection objectives.

III. COMMENTS ON PUBLIC DISCLOSURE OF CMS

3. Mandatory Public Disclosure of CMS URL is Strongly Supported

The requirement to publish the CMS URL through:

- newspapers,
- SMS,
- email,
- telephone bills,

is highly consumer-friendly.

Justification:

Many consumers remain unaware of:

- complaint tracking systems,
- online grievance platforms,
- escalation rights,

- digital complaint status tools.

Telecom operators frequently provide complaint mechanisms with:

- poor visibility,
- hidden navigation,
- inadequate publicity.

Mandatory disclosure improves:

- accessibility,
- transparency,
- public awareness,
- procedural fairness.

This is particularly important for:

- rural consumers,
- senior citizens,
- low-digital-literacy users.

4. Six-Monthly Consumer Communication is Welcome but Insufficient

The requirement to communicate CMS details every six months through SMS and/or email is appreciated.

However, additional periodic visibility mechanisms are needed.

Justification:

Consumers often search for complaint systems only during service failures. Awareness messages sent once in six months may:

- be ignored,
- deleted,
- forgotten.

Suggested Strengthening

The CMS information should also be:

- permanently visible on telecom apps,
- displayed on monthly bills,
- accessible from homepage banners,
- included in onboarding messages for new customers.

Justification:

Consumer rights information should remain continuously visible rather than periodically communicated.

IV. COMMENTS ON REAL-TIME TRACKING AND STATUS VISIBILITY

5. Regular Status Updates are Strongly Supported

The proposed requirement that consumers receive:

- regular updates,
- status information,
- actions taken,

- projected timelines, through application interface, SMS, and email until final resolution is strongly welcomed.

Justification:

One of the most common consumer grievances is:

- lack of communication after complaint registration,
- uncertainty regarding action taken,
- indefinite waiting periods.

Mandatory status updates significantly improve:

- transparency,
- predictability,
- trust,
- procedural fairness.

Consumers should never be forced to repeatedly contact customer care merely to know complaint status.

6. Detailed Complaint Lifecycle Visibility Should Be Mandatory

The regulation should further mandate visibility of:

- complaint registration timestamp,
- assigned officer/department,
- field technician assignment,
- escalation status,

- reopening history,
- closure reason,
- timeline breaches.

Justification:

Without detailed lifecycle visibility:

- complaints may be artificially shown as resolved,
- timelines may be manipulated,
- accountability becomes weak.

Complaint tracking should function similarly to:

- banking dispute systems,
- logistics tracking systems,
- consumer dispute dashboards.

Suggested Provision

“Consumers shall have access to complete complaint lifecycle history including timestamps, escalation actions, reassignment details, and closure rationale.”

V. COMMENTS ON COMPLAINT CLOSURE SAFEGUARDS

7. Complaint Closure Without Consumer Confirmation Should Be Restricted

The draft currently allows closure communication with survey links.

However, stronger safeguards are needed against premature closure.

Justification:

Telecom operators frequently:

- close complaints without actual resolution,
- mark complaints resolved after unsuccessful contact attempts,
- close complaints automatically through backend systems.

This creates:

- artificial improvement in KPIs,
- suppression of unresolved grievances,
- consumer dissatisfaction.

Suggested Safeguard

“No complaint shall be finally closed without:

- consumer confirmation, or
- documented resolution evidence, or
- clear closure justification visible to the consumer.”

Justification:

This protects consumers against:

- arbitrary disposal,
- statistical manipulation,

- non-transparent complaint handling.

VI. COMMENTS ON DATA RETENTION AND AUDITABILITY

8. Complaint History Retention Should Be Extended

The regulation should mandate retention of complaint records for at least three years instead of one year.

Justification:

Telecom disputes often involve:

- recurring billing issues,
- repeated network failures,
- chronic service deficiencies,
- litigation or consumer commission proceedings.

Consumers may require historical complaint records for:

- evidence,
- compensation claims,
- regulatory complaints,
- legal proceedings.

One-year retention may be insufficient.

Suggested Amendment

“Complaint records and complaint lifecycle data should be retained for a minimum period of three years.”

VII. COMMENTS ON INTEROPERABILITY AND MULTI-CHANNEL ACCESS

9. Omnichannel Complaint Synchronization Should Be Mandatory

The regulation should ensure that complaints registered through:

- IVRS,
- mobile app,
- website,
- email,
- physical centres,
- chatbot, are integrated into a unified complaint database.

Justification:

Currently, many operators maintain fragmented systems leading to:

- duplicate complaints,
- inconsistent tracking,
- conflicting status information.

Consumers should receive:

- one unified docket number,
- one consolidated complaint history,
- synchronized status updates.

VIII. COMMENTS ON AI AND AUTOMATED COMPLAINT HANDLING

10. AI-Based Complaint Systems Require Transparency Obligations

As telecom systems increasingly use:

- AI classification,
- automated workflows,
- chatbot escalation, additional safeguards are necessary.

Justification:

Algorithmic systems may:

- wrongly categorize complaints,
- deprioritize serious grievances,
- close complaints automatically,
- disadvantage vulnerable consumers.

Suggested Provision

“The Complaint Monitoring System shall maintain audit logs of automated decisions, classifications, escalations, and closures.”

Justification:

This improves:

- algorithmic accountability,
- auditability,
- regulatory supervision.

IX. COMMENTS ON ACCESSIBILITY AND DIGITAL INCLUSION

11. Complaint Monitoring System Must Be Fully Accessible to PwDs

The CMS should comply with:

- screen-reader compatibility,
- voice-assisted interfaces,
- keyboard navigation,
- accessible CAPTCHA alternatives,
- multilingual accessibility.

Justification:

Digital complaint systems should not exclude:

- visually impaired users,
- hearing-impaired users,
- elderly consumers,
- low-literacy users.

Accessibility is an essential consumer right.

X. COMMENTS ON REGULATORY OVERSIGHT

12. TRAI Should Have Real-Time Supervisory Access

The regulation should empower TRAI to:

- access anonymized complaint dashboards,

- conduct real-time monitoring,
- detect complaint spikes,
- identify systemic failures.

Justification:

Quarterly reporting alone may be insufficient for:

- urgent service disruptions,
- mass outages,
- large-scale billing failures,
- cyber incidents.

Real-time monitoring improves:

- regulatory responsiveness,
- preventive intervention,
- evidence-based enforcement.

XI. COMMENTS ON PRIVACY AND CYBERSECURITY

13. Complaint Monitoring System Must Incorporate Strong Data Protection Safeguards

The CMS handles highly sensitive data including:

- identity information,
- billing records,

- location-linked service issues,
- communication records.

Suggested Provision

“Service providers shall implement appropriate cybersecurity, encryption, access-control, and privacy safeguards for Complaint Monitoring Systems.”

Justification:

Without safeguards:

- consumer data breaches,
- unauthorized access,
- profiling risks, may increase.

XII. COMMENTS ON PERFORMANCE TRANSPARENCY

14. Consumers Should Have Visibility into Systemic Performance

The Complaint Monitoring System should publish:

- average resolution time,
- complaint backlog,
- service-area-wise trends,
- resolution percentages.

Justification:

Transparency improves:

- consumer trust,
- competition among operators,
- public accountability.

XIII. CONCLUDING CONSUMER POSITION

Clause 5 relating to the Complaint Monitoring System is one of the strongest and most technologically progressive components of the proposed amendment and is strongly supported from the consumer perspective.

The proposed framework substantially enhances:

- transparency,
- traceability,
- accountability,
- accessibility,
- consumer empowerment.

However, the regulation should be strengthened further through:

- lifecycle transparency,
- anti-premature-closure safeguards,
- extended data retention,
- auditability of automated systems,
- privacy protection,
- omnichannel integration,

- stronger TRAI supervisory access.

If implemented effectively with these safeguards, the Complaint Monitoring System can become the backbone of a modern, transparent, evidence-driven, and consumer-centric telecom grievance redressal ecosystem in India.

Comments on Clause 6 — “Acknowledgement & Communication of Complaints”

The proposed amendments relating to acknowledgement and communication of complaints under Regulation 7 are highly consumer-centric and represent a major improvement in transparency, traceability, and procedural accountability within the telecom grievance redressal framework.

The provisions appropriately recognize that grievance redressal is not merely about complaint disposal, but also about:

- timely acknowledgement,
- continuous communication,
- procedural visibility,
- informed consumer participation,
- digital traceability.

In the telecom sector, consumers frequently suffer not only due to service deficiencies, but also due to:

- absence of complaint acknowledgement,
- lack of updates,

- uncertainty regarding complaint status,
- disappearance of complaint records,
- arbitrary closure without communication.

The proposed amendments substantially address these long-standing deficiencies. However, certain additional safeguards are necessary to ensure that the communication framework remains transparent, verifiable, accountable, and consumer-centric.

I. COMMENTS ON ACKNOWLEDGEMENT OF COMPLAINTS

1. Mandatory Docket Number System is Strongly Supported

The continuation and strengthening of the docket-number-based complaint acknowledgement system is strongly supported.

Justification:

The docket number acts as:

- proof of complaint registration,
- digital evidence,
- tracking identifier,
- escalation reference,
- accountability anchor.

Without a unique complaint identifier:

- complaints may be denied,

- complaint history may disappear,
- consumers may repeatedly re-register complaints,
- escalation becomes difficult.

A mandatory docket system is therefore fundamental to procedural fairness and transparency.

2. Communication Through SMS and Email is Highly Consumer-Friendly

The amendment requiring communication through:

- SMS,
- email (where available),

is strongly welcomed.

Justification:

Consumers today increasingly depend upon digital communication for:

- proof preservation,
- timeline verification,
- complaint escalation,
- legal documentation.

SMS and email acknowledgements:

- create verifiable evidence,
- reduce disputes,
- improve transparency,

- strengthen consumer confidence.

This is especially important because many telecom disputes later escalate to:

- consumer commissions,
- TRAI complaints,
- legal proceedings.

Digital acknowledgement therefore becomes an important evidentiary safeguard.

II. COMMENTS ON COMMUNICATION OF ACTION TAKEN

3. Mandatory Communication of Action Taken is Strongly Supported

The requirement that consumers be informed regarding:

- action taken,
- complaint status,
- appellate procedure,

is highly consumer-centric.

Justification:

One of the major consumer grievances under the existing framework has been:

- absence of status communication,
- vague responses,

- silent closure of complaints,
- lack of escalation guidance.

Mandatory communication improves:

- procedural transparency,
- consumer awareness,
- accountability,
- fairness.

Consumers should never be left uncertain regarding:

- whether action was taken,
- whether the complaint is pending,
- whether escalation rights remain available.

III. COMMENTS ON APPELLATE RIGHTS COMMUNICATION

4. Mandatory Communication of Appeal Procedure is Extremely Important

The amendment requiring communication of the appeal procedure along with complaint disposal is strongly appreciated.

Justification:

Many telecom consumers remain unaware of:

- their appellate rights,
- timelines for appeal,

- mode of filing appeal,
- existence of Appellate Authorities.

As a result:

- dissatisfied consumers abandon grievances,
- procedural rights remain underutilized,
- accountability weakens.

Mandatory disclosure of appeal rights ensures:

- informed participation,
- procedural fairness,
- meaningful access to remedies.

This is consistent with principles of natural justice and consumer empowerment.

IV. COMMENTS ON COMMUNICATION QUALITY AND CONTENT

5. Communications Should Be Clear, Specific, and Non-Generic

The regulation should prohibit vague or templated closure messages.

Justification:

Currently, many telecom operators send generic responses such as:

- “issue resolved,”
- “appropriate action taken,”

- “network optimized,” without providing meaningful details.

Such communications:

- frustrate consumers,
- reduce transparency,
- prevent informed appeals.

Suggested Provision

“Complaint disposal communications shall clearly specify:

- action taken,
- basis of resolution,
- date and time of action,
- technical findings where applicable,
- reason for rejection or closure, if any.”

Justification:

Meaningful communication is essential for:

- informed consumer decision-making,
- effective appeal filing,
- transparency.

V. COMMENTS ON TIMELINESS OF COMMUNICATION

6. Complaint Acknowledgement Should Be Instantaneous

The regulation should explicitly require immediate acknowledgement upon complaint registration.

Justification:

Delayed acknowledgement creates:

- uncertainty,
- possibility of complaint denial,
- procedural disputes.

Digital systems today are fully capable of:

- real-time acknowledgement,
- automated timestamp generation,
- instant docket creation.

Suggested Provision

“Complaint acknowledgement along with docket number shall be generated immediately upon registration.”

VI. COMMENTS ON MULTILINGUAL COMMUNICATION

7. Communication Should Be in Consumer-Preferred Language

The regulation should ensure that:

- complaint acknowledgement,
- updates,

- closure communications,
- appeal information, are communicated in the language selected by the consumer.

Justification:

Consumers often struggle to understand:

- technical English terminology,
- legal language,
- procedural instructions.

Multilingual communication improves:

- accessibility,
- procedural clarity,
- inclusiveness,
- digital participation.

This is especially important for:

- rural consumers,
- elderly users,
- low-literacy subscribers.

VII. COMMENTS ON TRANSPARENCY OF DELAYS

8. Delay Communication Requirements are Strongly Supported

The broader framework requiring communication regarding delays and revised timelines is strongly appreciated.

Justification:

Consumers frequently experience:

- indefinite waiting periods,
- repeated follow-ups,
- absence of realistic timelines.

Mandatory disclosure of:

- reasons for delay,
- revised resolution timelines, improves:
- transparency,
- predictability,
- accountability.

Suggested Strengthening

Service providers should additionally categorize delays as:

- technical delay,
- field-service delay,
- dependency-related delay,
- external infrastructure delay.

Justification:

This prevents use of vague excuses and improves auditability.

VIII. COMMENTS ON DIGITAL RECORD PRESERVATION

9. Consumers Should Have Downloadable Complaint Records

The regulation should mandate downloadable complaint history.

Justification:

Consumers may require records for:

- appeals,
- consumer commission cases,
- TRAI complaints,
- legal evidence,
- compensation claims.

Suggested Provision

“Consumers shall be able to download complaint acknowledgement, status history, communications, and closure reports from the complaint portal or mobile application.”

IX. COMMENTS ON PROTECTION AGAINST FALSE CLOSURE

10. Closure Communication Should Include Reopening Facility

The regulation should provide consumers a limited right to reopen complaints.

Justification:

Complaints are often:

- closed prematurely,
- marked resolved despite persistence of issue,
- closed after temporary restoration.

Suggested Provision

“Consumers shall be permitted to reopen complaints within seven days where the issue persists or reoccurs.”

Justification:

This prevents:

- artificial complaint closure,
- manipulation of KPIs,
- repeated complaint registration.

X. COMMENTS ON ACCESSIBILITY FOR PERSONS WITH DISABILITIES**11. Complaint Communications Must Be Accessible**

The regulation should ensure accessibility of communications through:

- screen-reader compatible formats,
- voice-based updates,
- accessible mobile notifications.

Justification:

PwD consumers should not face barriers in:

- receiving acknowledgements,
- understanding complaint status,
- accessing escalation rights.

Accessibility is a core consumer right.

XI. COMMENTS ON DATA PRIVACY AND SECURITY

12. Complaint Communication Systems Should Ensure Data Protection

The regulation should mandate safeguards against:

- unauthorized disclosure,
- phishing risks,
- spoofed complaint messages,
- complaint data leaks.

Justification:

Complaint communications may contain:

- account information,
- billing data,
- identity details,
- location-linked service information.

Telecom complaint systems must therefore maintain:

- encryption,
- secure authentication,
- verified sender identification.

XII. COMMENTS ON PERFORMANCE ACCOUNTABILITY

13. Communication Failures Should Attract Regulatory Scrutiny

The regulation should clarify that:

- failure to acknowledge complaints,
- failure to communicate status,
- misleading closure communication, constitute regulatory non-compliance.

Justification:

Communication is not a procedural formality; it is an essential component of grievance redressal.

A complaint system without proper communication effectively becomes non-transparent and consumer-hostile.

XIII. CONCLUDING CONSUMER POSITION

Clause 6 relating to Acknowledgement and Communication of Complaints is strongly consumer-oriented and significantly strengthens:

- transparency,
- traceability,
- procedural fairness,
- accountability,
- consumer empowerment.

The proposed amendments appropriately recognize that telecom grievance redressal must operate as a continuous communication process rather than merely an internal complaint disposal exercise.

However, the framework should be further strengthened through:

- mandatory detailed closure explanations,
- multilingual communication,
- downloadable records,
- complaint reopening rights,
- anti-false-closure safeguards,
- accessibility standards,
- stronger data protection obligations.

If implemented effectively, the proposed communication framework can substantially improve consumer trust in the telecom grievance redressal ecosystem and reduce dissatisfaction arising from opaque complaint handling practices.

Comments on Clause 7 — “Complaint Redressal Timelines”

The proposed amendments relating to complaint redressal timelines under Regulation 8 are strongly consumer-centric and represent a significant modernization of the telecom grievance redressal framework.

The amendments appropriately recognize that:

- delayed grievance redressal effectively amounts to denial of consumer rights,
- telecom services today constitute essential digital infrastructure,
- modern digital ecosystems require rapid response mechanisms,
- consumer trust depends heavily upon time-bound resolution.

The proposed linkage of complaint redressal timelines with:

- Quality of Service Regulations,
- Telecom Commercial Communications Customer Preference Regulations (TCCCPR),
- Telecom Consumers Protection Regulations (TCP),

is broadly appropriate and desirable because it promotes:

- regulatory harmonization,
- consistency,
- uniform enforcement standards.

However, from the consumer protection perspective, additional safeguards, compensatory mechanisms, and stricter accountability provisions are

necessary to ensure that timelines are not merely declaratory but effectively enforceable.

I. GENERAL CONSUMER POSITION ON TIMELINES

1. Strong Support for Time-Bound Complaint Resolution

The proposed framework mandating resolution of complaints within specified timelines is strongly supported.

Justification:

Telecommunication services today support:

- banking transactions,
- digital identity verification,
- UPI payments,
- telemedicine,
- online education,
- emergency communication,
- remote work,
- e-governance.

Therefore, delayed complaint resolution can result in:

- financial losses,
- inability to access essential services,
- cybersecurity risks,
- digital exclusion,

- denial of emergency access.

A grievance redressal framework without enforceable timelines becomes ineffective in practice.

Time-bound redressal:

- improves accountability,
- reduces consumer anxiety,
- increases operational discipline,
- enhances public trust.

II. COMMENTS ON LINKAGE WITH QoS REGULATIONS

2. Harmonization with QoS and TCCCPR Frameworks is Appropriate

The amendment linking complaint timelines with:

- QoS Access & Broadband Regulations, 2024,
- TCCCPR, 2018,
- TCPR, 2012,

is strongly welcomed.

Justification:

Previously, fragmentation across regulatory frameworks often created:

- inconsistent interpretations,
- ambiguity in complaint handling,

- uneven compliance standards.

Regulatory harmonization improves:

- clarity,
- enforceability,
- operational consistency,
- consumer understanding.

This also ensures that:

- UCC complaints,
- billing disputes,
- network complaints,
- broadband issues, are handled within structured timelines.

III. COMMENTS ON DEFAULT THREE-DAY TIMELINE

3. Default Three-Day Resolution Timeline is Broadly Consumer-Friendly

The proposal that complaints for which no separate timeline exists should be resolved within three days is highly consumer-oriented.

Justification:

In absence of specified timelines, service providers frequently:

- delay action indefinitely,
- deprioritize complaints,
- keep grievances pending without accountability.

A default three-day limit:

- prevents regulatory gaps,
- ensures minimum accountability,
- reduces indefinite pendency.

This provision is particularly important for:

- service queries escalating into complaints,
- technical issues lacking category-specific timelines,
- emerging digital service disputes.

4. Certain Critical Complaints Require Faster Resolution

While the three-day framework is generally appropriate, certain complaints require priority resolution within shorter timelines.

Suggested Categorization

The regulation should prescribe accelerated timelines for:

- emergency service disruption,
- total network outage,
- SIM deactivation,
- fraudulent SIM swap,
- financial fraud linked to telecom service,
- unauthorized VAS activation,
- broadband outage affecting businesses or hospitals.

Justification:

Some telecom grievances directly affect:

- financial security,
- cybersecurity,
- emergency access,
- public safety.

A uniform timeline for all complaints may not adequately protect consumers in high-risk situations.

IV. COMMENTS ON DELAY ACCOUNTABILITY

5. Delays Beyond Prescribed Timelines Should Trigger Automatic Accountability

The regulation presently requires communication of delays but does not sufficiently impose consumer-centric consequences for timeline violations.

Justification:

Without consequences:

- timelines may become merely advisory,
- operators may normalize delayed resolution,
- consumer rights weaken.

Suggested Provision

“Where complaints are not resolved within prescribed timelines, the consumer shall automatically become entitled to:

- delay notification,
- revised resolution timeline,
- escalation rights,
- and compensation wherever applicable.”

Justification:

Automatic accountability:

- improves compliance discipline,
- discourages deliberate delay,
- strengthens consumer confidence.

V. COMMENTS ON COMPENSATION FOR DELAY

6. Compensation Framework Should Be Introduced for Excessive Delay

The regulation should provide for automatic compensation in specified cases of delayed complaint resolution.

Justification:

Consumers frequently suffer:

- monetary losses,
- productivity loss,
- mental harassment,

- disruption of essential services.

At present, consumers often spend:

- significant time,
- repeated follow-ups,
- additional expenses, without meaningful consequences for operators.

Suggested Provision

“Where complaint resolution exceeds prescribed timelines without reasonable justification, consumers should receive automatic compensation or service credits.”

Justification:

Compensation:

- internalizes compliance costs,
- incentivizes timely resolution,
- recognizes consumer harm.

This approach is already followed in:

- banking systems,
- airline compensation,
- electricity regulations,
- broadband service standards in several jurisdictions.

VI. COMMENTS ON TIMELINE TRANSPARENCY

7. Consumers Must Receive Clear Timeline Visibility

The regulation should require:

- expected resolution time,
- revised timeline,
- escalation deadline, to be communicated at every stage.

Justification:

Consumers frequently complain that:

- timelines are unclear,
- no expected resolution date is provided,
- delays occur without explanation.

Transparent timelines improve:

- predictability,
- trust,
- procedural fairness.

Suggested Addition

“Consumers shall be informed of:

- prescribed benchmark timeline,
- expected completion date,
- reasons for delay,
- revised estimated completion date.”

VII. COMMENTS ON REPEATED COMPLAINTS

8. Recurring Complaints Should Trigger Special Escalation

The regulation should recognize repeated unresolved complaints as systemic failures.

Justification:

Consumers often repeatedly complain regarding:

- chronic network issues,
- recurring billing errors,
- repeated broadband instability.

Repeated complaint cycles indicate:

- ineffective resolution,
- superficial closure,
- systemic service deficiencies.

Suggested Provision

“Where substantially similar complaints recur three or more times within six months, the complaint shall automatically escalate to higher supervisory review.”

Justification:

This prevents:

- repetitive superficial closures,
- artificial KPI improvement,
- endless complaint cycles.

VIII. COMMENTS ON UCC COMPLAINT TIMELINES

9. Strong Support for Inclusion of UCC Complaint Timelines

The explicit inclusion of TCCCPR-linked complaint timelines is strongly supported.

Justification:

Unsolicited Commercial Communication (UCC):

- significantly impacts consumer privacy,
- contributes to fraud risks,
- causes harassment,
- undermines trust in telecom systems.

Consumers frequently experience:

- delayed action on spam complaints,
- repeated spam from same entities,
- poor visibility into action taken.

The amendment appropriately recognizes UCC as a major consumer protection issue.

IX. COMMENTS ON SYSTEMIC OUTAGE COMPLAINTS

10. Large-Scale Service Outages Require Special Timelines

The regulation should provide separate provisions for:

- mass outages,
- cyber incidents,
- widespread network failure.

Justification:

During major outages:

- thousands of complaints may arise simultaneously,
- standard complaint timelines may become impractical.

However, consumers still require:

- real-time updates,
- estimated restoration timelines,
- public communication.

Suggested Provision

“In cases of large-scale outages, service providers shall publish periodic public updates regarding restoration progress and expected resolution timelines.”

X. COMMENTS ON APPEAL-RELATED TIMELINES

11. Reduction of Appeal Filing Window from 30 to 15 Days Requires Safeguards

The proposal reducing appeal filing time from 30 days to 15 days requires careful reconsideration from a consumer perspective.

Justification:

While faster resolution is desirable:

- many consumers may not immediately understand closure communication,
- rural consumers may face digital access issues,
- elderly consumers may require additional time,
- consumers may initially believe issues are resolved before recurrence.

A shorter limitation period may unintentionally reduce access to appeals.

Suggested Alternative

“The appeal period may remain thirty days, or at minimum, extendable upon reasonable cause.”

Justification:

Procedural fairness should not be sacrificed solely for administrative speed.

XI. COMMENTS ON PERFORMANCE REPORTING

12. Timeline Compliance Data Should Be Publicly Disclosed

The proposal for quarterly KPI reporting is strongly supported.

Justification:

Public disclosure of:

- average resolution time,
- delayed complaints,
- pending complaints, creates:
- transparency,
- reputational accountability,
- informed consumer choice.

This may incentivize:

- competition on service quality,
- faster complaint handling.

XII. COMMENTS ON REGULATORY ENFORCEMENT

13. Timeline Violations Should Trigger Regulatory Review

The financial disincentive framework under Regulation 18A is strongly welcomed.

Justification:

Without enforcement:

- timelines become symbolic,

- compliance weakens.

Financial disincentives:

- create deterrence,
- improve seriousness of compliance,
- encourage systemic improvements.

However, repeat offenders should face enhanced scrutiny.

XIII. CONCLUDING CONSUMER POSITION

Clause 7 relating to Complaint Redressal Timelines is one of the most important consumer-centric reforms in the proposed amendment and is strongly supported in principle.

The proposed framework substantially improves:

- accountability,
- predictability,
- transparency,
- regulatory harmonization,
- consumer confidence.

However, stronger safeguards are necessary regarding:

- automatic compensation,
- repeated complaints,
- emergency complaint prioritization,

- delay accountability,
- appeal limitation fairness,
- public outage communication,
- stricter enforcement mechanisms.

If strengthened appropriately, the proposed timeline framework can significantly improve the effectiveness, responsiveness, and credibility of India's telecom consumer grievance redressal ecosystem.

Comments on Clause 8 — “Appeal Filing Mechanism”

Draft Change: Reduction of Appeal Filing Window from 30 Days to 15 Days

The proposed amendment reducing the time available to consumers for filing an appeal before the Appellate Authority from thirty (30) days to fifteen (15) days requires careful reconsideration from the standpoint of consumer rights, procedural fairness, accessibility, and natural justice.

While the objective of expediting the appellate process is understandable and broadly desirable, the proposed reduction may unintentionally weaken consumer protection by restricting reasonable access to appellate remedies, particularly for vulnerable and digitally disadvantaged consumers.

Accordingly, the proposed reduction from 30 days to 15 days is not fully supported in its present form and requires modification with suitable safeguards.

I. GENERAL CONSUMER POSITION

1. Appeal Mechanism is a Fundamental Consumer Protection Safeguard

The appellate mechanism under TCCRR serves as the final internal remedy available to telecom consumers before they are compelled to:

- approach consumer commissions,
- file legal proceedings,
- complain to regulatory authorities,
- seek judicial intervention.

Justification:

The appeal stage is therefore not a mere procedural formality but an essential safeguard against:

- improper complaint disposal,
- arbitrary closure,
- inadequate redressal,
- biased first-level decision-making.

Reducing the appeal filing period excessively may:

- deny practical access to remedies,
- disproportionately affect vulnerable consumers,
- increase unresolved grievances,
- undermine trust in the grievance framework.

The regulation should therefore prioritize substantive consumer justice over administrative speed alone.

II. CONSUMER CONCERNS REGARDING REDUCTION TO 15 DAYS

2. Fifteen Days May Be Inadequate for Many Consumers

The proposed reduction from 30 days to 15 days may appear administratively efficient but may create serious practical difficulties for consumers.

Justification:

Telecom consumers often:

- initially believe the complaint has been resolved,
- discover recurrence of the issue after several days,
- require time to understand technical responses,
- need to gather documents and evidence,
- wait to observe whether the promised corrective action actually works.

In many cases:

- network problems recur,
- billing disputes reappear in subsequent billing cycles,
- temporary restorations fail again,
- promised service quality improvements do not materialize immediately.

A shorter appeal period may therefore prematurely extinguish consumer rights before the actual effectiveness of redressal can be assessed.

III. IMPACT ON VULNERABLE CONSUMERS

3. The Reduced Appeal Window May Disproportionately Harm Vulnerable Users

The proposed reduction may disproportionately affect:

- rural consumers,
- senior citizens,
- Persons with Disabilities,
- low-digital-literacy users,
- economically weaker consumers,
- consumers in remote areas.

Justification:

Such consumers often face:

- delayed awareness of closure messages,
- difficulty accessing portals or apps,
- limited email usage,
- language barriers,
- delayed understanding of appellate rights.

Many consumers do not regularly:

- check SMS,
- access email,
- monitor complaint portals.

A reduced limitation period may therefore effectively deny access to appeals for a large segment of consumers.

This would be contrary to:

- principles of inclusivity,
- digital equity,
- consumer accessibility,
- natural justice.

IV. PROCEDURAL FAIRNESS AND NATURAL JUSTICE

4. Consumer Rights Should Not Be Curtailed Solely for Administrative Convenience

The Explanatory Memorandum states that dissatisfied consumers generally file appeals without much delay and that the existing period was considered “too long.”

However, from a consumer rights perspective, procedural timelines should not be shortened solely based on administrative assumptions.

Justification:

A limitation period should:

- maximize fairness,
- ensure adequate opportunity,
- account for practical realities,

- protect weaker parties.

Telecom operators possess:

- sophisticated systems,
- dedicated legal teams,
- automated complaint platforms.

Consumers, by contrast, are often:

- individual subscribers,
- non-technical users,
- information-disadvantaged parties.

Therefore, procedural balance requires preserving a reasonable opportunity for appeal.

V. RETAINING 30 DAYS WOULD BETTER SERVE CONSUMER INTEREST

5. The Existing 30-Day Appeal Window Should Preferably Continue

The existing 30-day framework strikes a more balanced approach between:

- efficiency,
- accessibility,
- procedural fairness.

Justification:

Thirty days:

- provides reasonable reflection time,
- accommodates delayed realization of unresolved issues,
- allows document collection,
- accommodates digital access limitations,
- reduces procedural exclusion.

Importantly, there is no evidence presented in the Explanatory Memorandum showing that:

- the 30-day filing window itself caused major delays,
- consumers were abusing the timeline,
- appellate inefficiency primarily arose from delayed consumer filing.

The actual delays appear to have arisen more from:

- advisory committee processes,
- internal operational inefficiencies,
- procedural complexity.

Therefore, reducing consumer appeal rights may not effectively address the root cause of delay.

VI. ALTERNATIVE CONSUMER-FRIENDLY APPROACH

6. If Reduction is Retained, Delay Condonation Safeguards Must Be Included

If TRAI nevertheless proceeds with a shorter appeal window, then flexible safeguards are essential.

Suggested Amendment

“The Appellate Authority may entertain an appeal filed beyond fifteen days, if sufficient cause for delay is shown by the consumer.”

Justification:

This ensures:

- procedural fairness,
- flexibility,
- protection against genuine hardship.

Such provisions are common across:

- consumer law,
- civil law,
- administrative law,
- quasi-judicial proceedings.

Without condonation provisions:

- genuine grievances may be rejected on technical grounds,
- substantive justice may suffer.

VII. NEED FOR MANDATORY COMMUNICATION OF APPEAL DEADLINE

7. Consumers Must Be Clearly Informed About Appeal Time Limits

The regulation should mandate that:

- every closure communication,
- every complaint disposal message, must prominently specify:
- appeal deadline,
- mode of appeal,
- appellate contact details.

Justification:

Many consumers remain unaware:

- that appeal rights exist,
- that timelines apply,
- that delay may bar further remedy.

Without clear communication:

- procedural rights become illusory.

Suggested Provision

“Every complaint closure communication shall prominently mention:

- the right to appeal,
- appeal procedure,
- exact last date for filing appeal.”

VIII. DIGITAL ACCESS ISSUES

8. Telecom Service Disruptions Themselves May Prevent Timely Appeal Filing

Ironically, many telecom complaints involve:

- network failure,
- internet disruption,
- broadband outages,
- OTP failures,
- app malfunction.

Justification:

In such cases:

- consumers may be unable to access digital appeal systems within short timelines.

This becomes particularly problematic where:

- appeals rely heavily upon digital interfaces,
- telecom access itself is impaired.

A longer appeal period therefore protects consumers against technological barriers caused by the service provider itself.

IX. RISK OF FORCED LITIGATION

9. Overly Restrictive Appeal Timelines May Increase External Litigation

If consumers lose access to internal appeals due to short limitation periods, they may increasingly:

- approach consumer commissions,
- file legal proceedings,
- complain directly to TRAI,
- seek judicial remedies.

Justification:

This may:

- increase litigation burden,
- reduce effectiveness of internal grievance systems,
- increase adversarial disputes.

A stronger internal appeal mechanism with reasonable timelines is therefore beneficial for:

- consumers,
- service providers,
- regulators alike.

X. COMPARATIVE REGULATORY PRINCIPLES

10. Consumer Protection Laws Generally Favor Liberal Access to Remedies

Across consumer jurisprudence, procedural rules are generally interpreted liberally in favor of consumers because:

- consumers are weaker parties,

- service providers possess superior bargaining power,
- information asymmetry exists.

Justification:

A restrictive appellate timeline may:

- conflict with consumer welfare principles,
- weaken access to justice,
- reduce substantive fairness.

Consumer protection frameworks should remain:

- facilitative,
- accessible,
- rights-oriented, rather than excessively procedural.

XI. SUGGESTED CONSUMER-FRIENDLY ALTERNATIVE DRAFT

Suggested Redraft:

“A consumer may prefer an appeal within thirty (30) days from:

- receipt of unsatisfactory complaint resolution; or
- expiry of prescribed complaint resolution timeline.

Provided that the Appellate Authority may entertain appeals filed beyond the prescribed period upon sufficient cause being shown.”

XII. CONCLUDING CONSUMER POSITION

The objective of expediting appellate grievance resolution is appreciated and supported in principle. However, the proposed reduction of the appeal filing window from 30 days to 15 days may unintentionally:

- weaken consumer rights,
- reduce accessibility,
- disadvantage vulnerable consumers,
- increase procedural exclusion,
- undermine natural justice.

The existing 30-day framework better balances:

- efficiency,
- accessibility,
- fairness,
- practical consumer realities.

Accordingly:

- the existing 30-day appeal period should preferably be retained; or
- at minimum, delay-condonation safeguards and mandatory appeal-right communication mechanisms should be incorporated.

A consumer grievance framework must prioritize meaningful access to justice over mere procedural acceleration.

Clause 9 – Appellate Authority Structure (Regulation 10)

Draft Change: Appellate Authority must be a senior-management employee.

Executive summary

The draft change to Regulation 10 that requires the Appellate Authority to be “a regular employee in the senior management of the service provider with at least 5 years of experience” should not be retained as drafted. It may improve speed and internal accountability, especially when read with the draft’s shorter appeal timelines and quarterly reporting to the CEO or Board, but it materially weakens perceived and actual independence unless additional safeguards are built in. As drafted, it does not specify independence criteria, prohibited reporting lines, recusal, conflict disclosure, minimum adjudicatory qualifications, or any independent second look. Those omissions matter because the same draft also removes the existing Advisory Committee that currently includes a consumer-organisation representative, and the current 2012 framework expressly required the Appellate Authority to consider that committee’s advice and record reasons if it departed from it. [1]

From a consumer standpoint, the best course is redraft, not outright rejection. A pure external appellate officer would maximize independence, but it may be harder to implement uniformly across all providers and licensed service areas within the compressed timelines the draft now contemplates. A hybrid model is therefore preferable: allow an internal senior officer only if they are structurally independent from the business unit under appeal, subject to recusal and conflict rules, reasoned written orders, public reporting, and a mandatory external review path for rejected or high-impact appeals. That approach better balances independence, expertise, speed, cost, and consumer trust.[2]

What the draft changes and why it matters

Under the present 2012 TCCRR, the Appellate Authority may consist of one or more persons as decided by the service provider. But that flexibility was offset by an Advisory Committee comprising one consumer-organisation representative and one service-provider representative; the Appellate Authority had to give due consideration to that advice and record reasons if it disagreed. The 2012 explanatory memorandum shows TRAI adopted that structure after consultation because consumer organisations wanted a stronger, more credible appeal layer and service providers resisted outside participation in decision-making. [1]

The 2026 draft moves in the opposite direction. It makes the Appellate Authority an internal senior-management employee with at least five years' experience, deletes the Advisory Committee, shortens appeal processing, and adds quarterly reporting to the CEO or Board. The speed and oversight elements are positive for consumers. But independence becomes more fragile because internal management is being strengthened at the same time that the existing consumer-participation check is being removed. The draft is also silent on whether the appellate officer can belong to, supervise, or be supervised by the same business unit whose action is under challenge. That is a serious conflict-of-interest gap.[1]

A further concern is decision quality and reviewability. The current 2012 Regulation 14 requires a reasoned order in writing, stating points for determination and the decision thereon. In the draft text supplied, the proposed appellate disposal clause speaks of examining the appeal and

giving a final decision within 15 days, but does not clearly preserve the existing explicit requirement of a reasoned written order. If independence is being diluted, the duty to issue a speaking order becomes even more, not less, important.[3]

Consumer impact assessment

Requiring the appellate authority to be a senior management employee creates a reasonable apprehension of institutional bias. The officer will remain within the operator's hierarchy, incentives, and performance environment. In telecom disputes, appeals frequently concern billing, disconnection, service quality, porting, UCC handling, refunds, waiver of charges, accessibility failures, or actions by customer care and operations. Those issues often affect cost, revenue realization, complaint metrics, and churn. An appellate design that places the decision-maker inside senior management, without ring-fencing, makes "the company judging its own cause" a plausible consumer perception. Even if many officers act fairly, the architecture still suppresses trust. [4]

The practical argument for the draft is speed. A senior internal officer can access systems, direct departments, and implement remedies faster than an external person. That is real value, especially when Ofcom and ACMA both emphasize that providers must have clear complaint procedures and prompt internal handling before matters go to independent ADR or ombudsman channels. But comparative practice shows that speed is not treated as a substitute for independence. In the UK, providers must maintain complaint procedures and belong to an approved ADR scheme; ADR bodies are

independent, impartial, and free to use once internal resolution fails or deadlock arises. In Australia, ACMA directs consumers first to complain to the provider, then to the independent TIO if still dissatisfied; the TIO describes itself as free, fair, and independent. [5]

On expertise, “senior management” and “five years’ experience” are not enough. Seniority may indicate administrative authority, but not adjudicatory competence. Appeal quality depends on understanding contract interpretation, consumer law, telecom regulation, evidence assessment, proportional remedies, accessibility obligations, and procedural fairness. A senior sales, network, finance, or revenue-assurance executive could satisfy the draft as written yet still be ill-suited to decide quasi-adjudicatory appeals. Minimum qualifications should therefore go beyond seniority and include telecom regulation, consumer affairs, law, compliance, dispute resolution, or public administration. [6]

On accountability, the draft’s quarterly reporting to the CEO or Board is worth retaining, but it is only internal oversight. It cannot substitute for impartiality. By contrast, the current TCCRR history shows TRAI deliberately used consumer participation and reasoned decision-making as credibility devices, and Indian telecom law more broadly has long recognized independent adjudicatory structures, including TDSAT, to protect both service-provider and consumer interests. That broader legal pattern supports adding, not reducing, adjudicatory distance at the appeal stage. [7]

Comparative and Indian legal context

The international pattern is clear. In the UK, Ofcom requires communications providers to have an accessible complaints code of practice, to take prompt and active steps to resolve complaints, and to belong to an approved ADR scheme. Those ADR schemes are independent, impartial, and free, and customers may go to them after six weeks or earlier with a deadlock letter. In Australia, ACMA similarly requires the consumer to complain to the provider first, but then points dissatisfied complainants to the Telecommunications Industry Ombudsman, an independent and free body. These systems do not make the carrier's own senior management the last meaningful word on the dispute. [5]

Indian telecom precedent also counsels caution. TRAI's own 2012 explanatory memorandum recorded strong consumer dissatisfaction with the earlier grievance structure and considered giving the appellate layer more consumer participation. The final 2012 model therefore included a consumer representative in the Advisory Committee and required reasons where the Appellate Authority differed from that advice. The present draft removes both those trust-building features while internalizing the appellate function further. That is a policy regression from the consumer's perspective unless new safeguards are added. [1]

Recommendation and precise redraft

Recommendation: Redraft. Do not retain the "senior management employee" requirement in its present bare form.

Suggested substitute text for Regulation 10(2), with consequential safeguards:

“The Appellate Authority shall be a fit and proper person with not less than ten years’ experience in telecommunications, consumer affairs, law, regulation, compliance, public administration, or dispute resolution. A service provider may appoint either an independent external person or a regular employee not below senior management:

Provided that where a regular employee is appointed, such employee shall not have had direct operational, commercial, revenue, billing, network, or customer-care responsibility for the subject matter under appeal during the preceding one year, and shall, for purposes of appellate functions, report directly to the Chief Executive Officer or a Board-level committee and not to any business unit whose action is under appeal.

Provided further that the Appellate Authority shall disclose any conflict of interest, recuse in any case giving rise to a reasonable apprehension of bias, and pass a reasoned written order.

Provided also that every service provider shall provide, in such categories of cases as may be specified by the Authority, a further review by an independent external reviewer or panel empanelled in the manner specified by the Authority.”

This wording preserves implementation flexibility while curing the main consumer risks: lack of independence, undefined expertise, unregulated conflicts, and absence of independent escalation. It also aligns with the

draft’s speed objective because it does not require an external body in every routine appeal. [8]

Options comparison and implementation safeguards

Model	Independence	Speed	Expertise	Cost	Consumer trust	Enforceability
Senior management employee only	Low	High	Variable	Low	Low	Medium
Independent external appellate officer	High	Medium	High if qualifications prescribed	High	High	High
Hybrid model	Medium-High	High	High	Medium	High	High

This assessment is inferential, based on the present TRAI design, the previous TCCRR safeguards, and the UK/Australia complaint models that combine internal handling with independent review. [9]

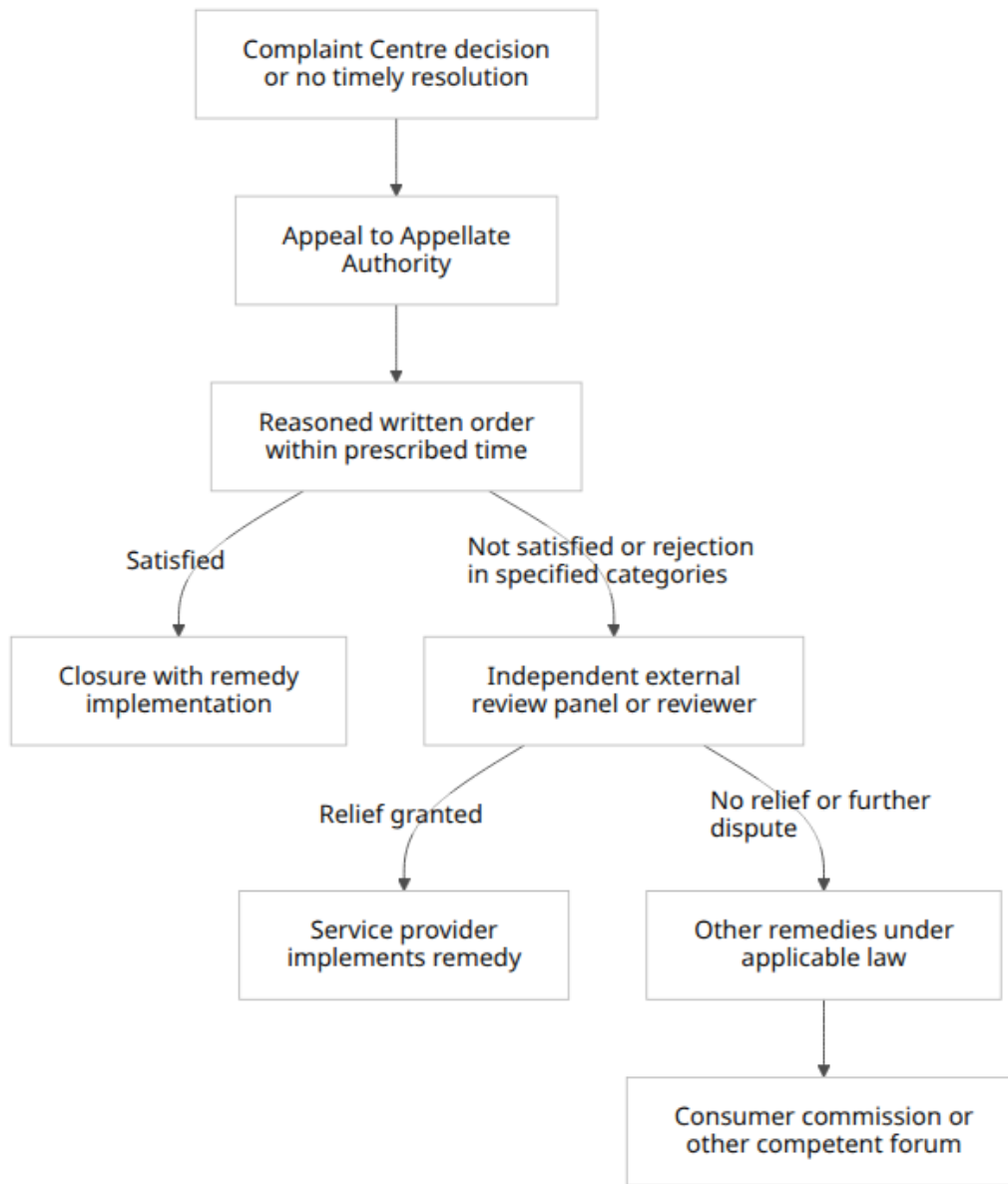
For implementation, the most important safeguards are these. First, define “senior management” and prohibit the appellate officer from sitting in the same reporting chain as the impugned unit. Second, restore or preserve the requirement of a reasoned written order. Third, mandate disclosure and recusal. Fourth, require publication in quarterly reports of appeal outcomes, reversals, compensation/refunds granted, average disposal time, and repeat complaints on the same issue. Fifth, require an independent reviewer for rejected appeals, disconnection disputes, accessibility/PwD disputes, high-value billing disputes, and systemic issues. Sixth, keep the draft’s CEO/Board

reporting and link non-compliance to the draft's financial-disincentive framework. [4]

Consumer-facing text and escalation path

Suggested consumer notice

“If you are dissatisfied with the action taken on your complaint, you may file an appeal within 15 days through the app, website, email, complaint centre, post, or in person. Your appeal will be examined by an Appellate Authority that is independent of the business unit whose action you are challenging. You will receive an appeal number immediately and a reasoned written decision within 15 days. If you remain dissatisfied, you may seek review through the independent review mechanism specified by the Authority and may also pursue any other remedy available under law.” [4]



Assumptions and limitations

This report assumes the uploaded draft text accurately reflects the proposed amendment and notes as unspecified: the meaning of “senior management,” tenure security, prohibited reporting lines, recusal rules, conflict disclosure,

minimum adjudicatory qualifications beyond five years' experience, and any regulator-recognised independent review body. It also notes that the browser could access UK and Australian primary sources directly, but FCC primary pages were intermittently unavailable; the U.S. comparison therefore rests on accessible public descriptions of the FCC's complaint-handling structure rather than directly fetched FCC guidance. [10]

[1] [3] [6] [7] https://traf.gov.in/sites/default/files/2024-10/TCCR_Regulations_05Jan2012.pdf

https://traf.gov.in/sites/default/files/2024-10/TCCR_Regulations_05Jan2012.pdf

[2] [5] [9] <https://www.ofcom.org.uk/phones-and-broadband/service-quality/adr-schemes>

<https://www.ofcom.org.uk/phones-and-broadband/service-quality/adr-schemes>

[4] [8] <https://www.ofcom.org.uk/phones-and-broadband/service-quality/problem-with-your-phone-provider>

<https://www.ofcom.org.uk/phones-and-broadband/service-quality/problem-with-your-phone-provider>

[10] https://en.wikipedia.org/wiki/Federal_Communications_Commission

https://en.wikipedia.org/wiki/Federal_Communications_Commission

Clause 10 – Deletion of Advisory Committee (Regulation 11 & 13) :

Why the Advisory Committee should not be deleted?

From a consumer-protection and telecom-policy standpoint, the public record does not presently prove that the Advisory Committee was the primary cause of delay or weakened efficiency in the appellate grievance redressal process. What the published 2026 draft does contain is a set of assertions: that the committee was “not found to be functioning effectively,” that scheduling difficulties and unavailability of members “often resulted in delays,” and that the overall timeline was “often going beyond 40 days.” What the draft does not publish is the evidence one would normally expect before removing the only mandated consumer-side participation in the appellate stage: no year-wise industry appellate dataset, no average disposal-time study, no operator-wise delay attribution, and no case-list showing delays directly caused by the Advisory Committee. [1]

That evidentiary gap matters because the Advisory Committee was introduced in 2012 for a very specific reason. TRAI recorded that consumer organisations wanted representation in the appellate layer, while service providers and industry bodies resisted having any “outside agency” in the decision-making apparatus. TRAI’s compromise was a two-member Advisory Committee with one consumer-organisation representative and one service-provider representative, feeding advice into the Appellate Authority rather than replacing it. In other words, the consumer member was not an accident or excess; it was the minimum structural safeguard TRAI inserted after service providers resisted fuller consumer participation. [2]

The strongest policy position for opposing deletion is therefore this: TRAI has not yet discharged the burden of proof that deleting consumer representation is necessary, proportionate, or aligned with consumer interest and natural justice. If speed is the objective, the less restrictive approach is to reform the Advisory Committee's functioning, digitise it, tighten its timeline, and publish performance metrics—rather than abolish the consumer seat altogether. [3]

What the legal and policy record shows?

Why the consumer member was created?

TRAI's 2007 consultation paper diagnosed a complaint-handling problem rooted largely in service-provider-side deficiencies: private providers often had no effective customer-facing grievance office; franchisees and agents did not attend to complaints; service providers had not effectively implemented the common charter; many complainants were not informed of resolution or even acknowledgement; and complaints forwarded by TRAI were sometimes not replied to, replied to late, or replied to without root-cause analysis. The same consultation paper said consumers needed a speedy, effective, independent and inexpensive redressal mechanism within the company structure. [4]

When TRAI redesigned the regime in 2012, it recorded that many consumer organisations believed the old system had not been effective and wanted an appellate structure with consumer representation. TRAI initially proposed a three-member Appellate Authority including a consumer-side member, but service providers opposed the idea because they did not want an outside agency inside the decision-making apparatus. TRAI then settled on a two-

member Advisory Committee consisting of one consumer-organisation representative and one service-provider representative to advise the Appellate Authority on every appeal. [5]

That 2012 design also built in several independence and transparency protections. The consumer-side Advisory Committee member had a fixed term, could not be removed before completion of tenure without TRAI's prior written approval, and the Appellate Authority had to give due consideration to the committee's advice. If the Appellate Authority decided contrary to that advice, it had to record reasons in writing. The secretariat also had to keep records of the appeal, the service provider's reply, the Advisory Committee's advice, and the Appellate Authority's decision. [6]

What the 2026 draft now says?

The 2026 draft proposes to delete the Advisory Committee and the related scrutiny stage. The explanatory note says the committee was not functioning effectively, that it created loss of trust in the appellate process, and that practical challenges such as scheduling difficulties and member unavailability often resulted in delays. The same note says the existing stepwise process often took more than 40 days, and proposes a new model under which the Appellate Authority would redress the appeal within 15 days of receipt. The draft also seeks to make the Appellate Authority a regular senior-management employee of the service provider and requires quarterly reporting up to the board and CEO, along with online consumer surveys. [7]

Those proposals improve internal management oversight, but they also make the appellate function more internal to the provider, not less. The consumer-

side structural counterweight disappears, while the decision-maker becomes more explicitly part of senior management. That is the core tension in the proposal. [1]

Direct answers to the evidentiary questions

The public record on appellate volumes and disposal

The existing 2012 regulations require every service provider to file quarterly reports showing only the number of appeals received, disposed of, and pending. They do not require publication of average disposal time. TRAI’s own 2026 draft effectively acknowledges this limitation by saying the old reporting requirement—appeals disposal only—was inadequate and that a new reporting framework with defined metrics is needed. [8]

The best publicly retrievable figures found are scattered across operator-quarter disclosures and TRAI annual reports, not in a single official annual industry table:

Requested item	Best public evidence located
<p>Year-wise number of complaints received at the Appellate Authority</p>	<p>No centralized TRAI year-wise industry series was found in the public record we reviewed.</p> <p>What exists publicly is dispersed operator-quarter reporting. For example, Jio’s quarter ended September 2024 shows 958 appeals received, 924 disposed, and 185 pending. Jio’s quarter ended December 2025 shows, by summing the circle-wise rows, 708 appeals received, 655 disposed, and 193 pending. [9]</p>
<p>Average disposal time</p>	<p>No published average disposal-time series</p>

Requested item	Best public evidence located
<p>with Advisory Committee involvement</p>	<p>was found. The current rules publish counts, not average days. The rule-based workflow under the 2012 regulations allows approximately 39 days from receipt to disposal: acknowledgement within 3 days, forwarding to service provider within 3 days, service-provider reply in 7 days, placement before Advisory Committee within 2 days, Advisory Committee advice in 15 days, placement before Appellate Authority within 2 days, and Appellate Authority decision within 10 days. [6]</p>
<p>Cases where delay was directly attributable to the Advisory Committee</p>	<p>We did not find any public case-list, operator report, or TRAI annexure identifying specific appeals delayed because the Advisory Committee could not meet. The 2026 draft gives only a general assertion about scheduling difficulties and member unavailability; it does not publish examples or a dataset. [7]</p>
<p>Comparative data showing delays caused by TSP non-compliance or incomplete submissions</p>	<p>TRAI’s 2007 consultation documented that complaints forwarded by TRAI were sometimes not replied to, replied to very late, or replied to without root-cause analysis. It also recorded broader service-provider weaknesses in complaint handling. In 2013, Consumer VOICE told TRAI that the process seemed to start afresh at the Appellate Authority, appeals were not always acknowledged, and consumers had no recourse if an appeal was not registered. Those are TSP/process-side issues, not evidence of Advisory Committee-caused delay. [10]</p>

Requested item	Best public evidence located
<p>Justification for removing consumer representatives when only a small share reaches appellate stage</p>	<p>The published materials do not supply a proportionality analysis. Publicly available examples actually show very small appellate volumes: in one Airtel March 2021 broadband subgroup report, 84,470 complaints produced 6 appeals received; in one Airtel wireline subgroup report, 22,995 complaints produced 9 appeals received. Jio, a provider serving over 488 million subscribers in FY 2024-25, reported 958 appeals in a quarter ended September 2024. Numerically, the appellate docket is tiny, so the case for eliminating consumer representation to save process time needs stronger proof than TRAI has yet published. [11]</p>
<p>Assessment of impact on transparency, independence, and consumer trust</p>	<p>Existing rules require the Appellate Authority to record reasons when it disagrees with the Advisory Committee, and the records must preserve the committee’s advice. Deletion removes both the external consumer voice and the written “reason-for-disagreement” discipline, while the draft simultaneously shifts the Appellate Authority more firmly into senior management. That change is likely to reduce visible independence and could weaken consumer trust unless replaced by an equally credible external safeguard. [8]</p>

What can be said about the “2–5%” issue?

On the public evidence we reviewed, some escalation rates appear lower than 2–5%, not higher. In Airtel’s March 2021 subgroup reports, appeals were a tiny fraction of complaint volumes in the cited service-area groupings. That does not prove the whole sector behaves the same way, but it does show the appellate docket is numerically small enough that deleting consumer representation to gain speed should be justified by hard data, not inference.

[12]

Just as importantly, low appellate penetration cannot automatically be read as proof that the appellate stage is unnecessary. TRAI itself recorded in 2012 that surveys found low consumer awareness of the complaint-redressal mechanism and dissatisfaction with existing redressal. Earlier survey material and TRAI’s 2008 release also pointed to very low awareness of grievance redressal mechanisms. Consumer VOICE later told TRAI that appeals were not always acknowledged and the process could restart at the appellate stage. So a low appellate count may reflect awareness, access, trust, and acknowledgement problems, not lack of consumer need. [13]

What the available data suggest about the real sources of delay?

The 2012 rule-based appellate workflow matters because it shows where delay can occur. Of the roughly 39 days permitted by the existing regulatory design, the Advisory Committee’s advice stage accounts for 15 days, while the remaining 24 days are allocated to other steps such as secretariat handling, service-provider reply, and final decision by the Appellate Authority. By simple arithmetic, even if the Advisory Committee were perfectly

eliminated, not all delay would disappear; much of the timeline sits elsewhere in the workflow. [6]

The stronger public evidence of dysfunction actually lies on the service-provider and process side. TRAI's 2007 consultation recorded no or late replies, absence of root-cause analysis, weak implementation of the common charter, and poor frontline grievance handling. Consumer VOICE added that complaints seemed to begin afresh at the appellate stage, that not all complaints were acknowledged, and that consumers lacked recourse if the Appellate Authority did not register the complaint. These are classic indicators of poor process design, weak acknowledgement controls, and weak accountability—not specific proof that the consumer representative caused the delay. [10]

Even operator reports that show appeals disposed beyond the specified time limit do not attribute the cause to the Advisory Committee. For example, an Airtel March 2021 broadband subgroup report shows 7 appeals to be decided, of which 2 were disposed beyond the specified time limit. A cited wireline subgroup report shows 9 appeals to be decided, of which 1 was disposed beyond the specified time limit. Those records establish that delay existed, but they do not prove the delay came from the Advisory Committee rather than internal provider response or secretariat handling. [12]

There is also a broader scale mismatch between appellate data and complaints surfacing elsewhere. TRAI annual reports show the Authority received 51,927 telecom complaints in FY 2021-22, 44,096 in FY 2022-23, and 44,734 in FY 2023-24, all of which were forwarded to service providers for

appropriate action. Those volumes are far larger than the quarter-level appellate counts publicly visible in individual operator disclosures. The reasonable inference is that the appellate stage is only one narrow slice of the complaint ecosystem, and failure analysis should cover the full pipeline rather than focus only on the Advisory Committee. [14]

Impact on transparency, independence, and consumer trust

The existing model does not give the Advisory Committee decision-making power; it gives it an advisory and accountability function. That is precisely why the requirement that the Appellate Authority record reasons when it departs from the committee's advice is so important. It creates a documentary record of whether the provider's final internal appellate decision aligned with, or ignored, the consumer-side input. Removing the committee removes that record. [6]

Independence is also being reduced in structural terms. Under the draft, the Appellate Authority is meant to be a regular employee in senior management of the service provider. If, at the same time, the consumer-organisation seat is deleted, the appellate layer becomes more clearly an internal managerial function of the same entity whose conduct is being challenged. TRAI proposes internal board oversight and consumer surveys, which are useful additions, but they are not equivalent to retaining an external consumer participant in the appeal process itself. [7]

On trust, the history is important. TRAI introduced consumer representation because it wanted to strengthen the appellate process, and it did so after recording that service providers resisted outside participation. Deleting that

representation now—without publishing a compelling evidence base—will predictably be read by many consumers and consumer bodies as a move from a mixed review structure to a provider-only appellate structure. That perception risk is real even if the service provider acts fairly in individual cases, because trust depends not only on the outcome but on whether the process visibly looks balanced. [15]

As a matter of sound regulatory practice, the proposal to delete the Advisory Committee cannot be accepted in its present form. The issue is not whether delays exist in the appellate process—delays may very well exist—but whether Telecom Regulatory Authority of India has correctly diagnosed their source and has chosen a proportionate, evidence-based remedy. On both counts, the current proposal falls short.

At the outset, the Authority must be pressed to establish a credible evidentiary foundation before proceeding with any structural dilution of consumer safeguards. A reform of this nature cannot rest on broad assertions of “delay” or “inefficiency.” It requires disaggregated, verifiable data. Specifically, TRAI should be required to publish, for at least the past five years, operator-wise and year-wise data covering: the number of appeals received, disposed, and pending; average disposal time; proportion of cases exceeding prescribed timelines; and a clear classification of delay causes—whether attributable to internal processing, operator response time, procedural adjournments, or any role played by the Advisory Committee. Further, the Authority must disclose how often hearings were delayed due to non-availability of consumer representatives, how frequently the Appellate

Authority diverged from Advisory Committee advice, and how many consumer complaints have explicitly attributed delay to the committee mechanism.

Without such a dataset, the consultation remains assertion-led rather than evidence-led. Regulatory reform in a sector as critical as telecommunications cannot proceed on presumptions; it must be anchored in demonstrable causation. In the absence of this, the proposal risks being perceived not as a reform for efficiency, but as a structural weakening of consumer representation.

Even assuming that delays exist, the principle of proportionality must govern the choice of remedy. The appellate mechanism under the telecom consumer framework handles a relatively small docket when compared to the vast volume of complaints at the primary redressal level and the enormous subscriber base across service providers. Eliminating the only formally embedded consumer voice in the appellate process to optimise such a limited caseload is, on its face, a disproportionate intervention. More importantly, the regulatory timelines themselves indicate that a significant portion of the delay occurs outside the Advisory Committee stage. If more than half of the prescribed time is consumed in stages unrelated to the committee, then its removal cannot logically be justified as the primary solution.

A proportionate response would first identify and address the dominant sources of delay. Without that diagnosis, removing the Advisory Committee resembles a solution in search of a problem.

There are, moreover, several less restrictive and far more balanced alternatives available—options that can enhance efficiency without sacrificing consumer participation. The most practical approach would be to modernize the functioning of the Advisory Committee rather than abolish it. For instance, all committee sittings can be made virtual-by-default, eliminating logistical delays entirely. Routine matters can be handled through circulation-based advice, thereby reducing the need for formal sittings. The advisory window, currently set at fifteen days, can be rationalized to five or seven working days without undermining deliberative quality.

Additionally, a structured sitting calendar—weekly or monthly—can ensure predictability and prevent case accumulation. To address concerns regarding availability, TRAI may empanel a pool of reserve consumer representatives so that the absence of any one member does not stall proceedings. The scope of mandatory committee review can also be intelligently limited to defined categories such as billing disputes, disconnections, tariff mis-selling, service suspension, repeated unresolved complaints, and systemic grievances. Importantly, the existing safeguard requiring the Appellate Authority to record reasons when it departs from the Advisory Committee’s view should be retained, as it ensures accountability and transparency in decision-making.

If, despite these alternatives, the Authority remains inclined to simplify the appellate structure, then it must introduce robust transparency and accountability substitutes. At a minimum, anonymised appellate orders should be placed in the public domain to enable scrutiny and build trust. Quarterly performance reports should disclose key indicators such as

average disposal time, percentage of cases exceeding timelines, and categorised reasons for delay. Every appeal must receive an automatic acknowledgement with a trackable reference number, ensuring that no grievance disappears into procedural opacity. Furthermore, there must be an external escalation mechanism—either to TRAI itself or to an independent ombudsman-like body—in cases where the Appellate Authority fails to act within prescribed timelines.

These safeguards are not procedural luxuries; they are essential to maintaining consumer confidence in the system. Past stakeholder inputs, including those from established consumer bodies, have consistently emphasized the importance of acknowledgement mechanisms and post-appellate recourse precisely because of the asymmetry between individual consumers and large service providers.

Finally, the historical context of the regulation cannot be ignored. When the appellate framework was originally designed, service providers had expressed a preference for excluding external participants from the decision-making structure. The inclusion of the Advisory Committee—particularly the consumer-side representative—was a deliberate regulatory choice to preserve an element of independence and public accountability. Removing that representation now effectively completes the trajectory that service providers had initially advocated. In a regulatory exercise that is explicitly framed as consumer protection, such an outcome demands the highest level of justification.

In sum, the proposal to delete the Advisory Committee is premature, insufficiently justified, and disproportionate to the stated objective. A more balanced path lies in evidence-based diagnosis, procedural optimization, and targeted reforms that preserve the core principle of consumer representation. Any move to eliminate that principle without exhausting less intrusive alternatives would not only weaken the institutional design of the appellate mechanism but also risk eroding public trust in the regulatory framework itself.

A concise policy demand:

“TRAI should not delete the Advisory Committee unless and until it publishes a quantified impact assessment proving that committee functioning, and not TSP-side process failure, is the principal source of delay. If TRAI’s objective is speed, the proportionate response is to reform the committee’s functioning and publish performance metrics, while retaining consumer participation and the obligation to record reasons where the Appellate Authority differs from the consumer-side advice.” [3]

Open questions and limitations

A few items remain genuinely incomplete in the public domain we reviewed. We did not find a centralized official TRAI annual series for the number of appeals received at the Appellate Authority across all TSPs. We also did not find a published series for average disposal time with Advisory Committee involvement, nor a public case-list identifying specific delays directly caused by the Advisory Committee. Current public reporting appears to have focused

mainly on counts received, disposed, and pending, and TRAI's own draft says this reporting was inadequate. That incompleteness strengthens, rather than weakens, the case for opposing deletion until TRAI discloses a fuller evidence base. [8]

[1] [3] [7] https://www.trai.gov.in/sites/default/files/2026-05/Regulation_07052026.pdf

https://www.trai.gov.in/sites/default/files/2026-05/Regulation_07052026.pdf

[2] [5] [6] [8] [13] [15] https://www.trai.gov.in/sites/default/files/2024-10/Telecom-TCCRR0012012%20_0.pdf

https://www.trai.gov.in/sites/default/files/2024-10/Telecom-TCCRR0012012%20_0.pdf

[4] [10] https://www.trai.gov.in/sites/default/files/2024-09/consultation3jan07_1.pdf

https://www.trai.gov.in/sites/default/files/2024-09/consultation3jan07_1.pdf

[9] <https://myjiostatic.cdn.jio.com/jio/regulatory/regulatory-performance-reports-for-the-qe-sep24.pdf>

<https://myjiostatic.cdn.jio.com/jio/regulatory/regulatory-performance-reports-for-the-qe-sep24.pdf>

[11] [12] [16] https://assets.airtel.in/teams/simplycms/web/docs/FixedLine_CGR_Q4_JFM_2020-21_Final_010621.pdf

https://assets.airtel.in/teams/simplycms/web/docs/FixedLine_CGR_Q4_JFM_2020-21_Final_010621.pdf

[14] https://www.trai.gov.in/sites/default/files/2024-10/Annau_Report_23022023_0_0.pdf

https://www.trai.gov.in/sites/default/files/2024-10/Annau_Report_23022023_0_0.pdf

[17] <https://www.trai.gov.in/sites/default/files/2024-11/201308201129480468181voice%20comments.pdf>

<https://www.trai.gov.in/sites/default/files/2024-11/201308201129480468181voice%20comments.pdf>

TRAI's explanatory memorandum appears to justify deletion mainly on efficiency grounds. It notes that, in FY 2022-23, TRAI received 44,733 telecom complaints, while only 81 telecom complaints were referred by consumer organisations, which TRAI describes as about 0.18% of the total. TRAI also records the view that Advisory Committee hearings add scheduling and administrative burden. [8]

That evidence does not support deletion. It supports the opposite conclusion. If consumer-organisation referrals are such a small fraction of total complaints, then retaining a consumer-representative layer imposes only a narrow, targeted oversight burden concentrated on the small subset of disputes that are serious enough to escalate. In other words, the data show

that independent consumer participation is not a mass-processing obstacle; it is a quality-control safeguard for the hardest cases. [8]

TRAI's own earlier work also shows that the real problem lies elsewhere. In its 2016 consultation on telecom complaints and grievances, TRAI found huge disparities between operators in the number of appeals relative to complaints, and specifically said that this suggested TSPs were implementing and operating the grievance mechanism in different ways, including "differently defining what an appeal is and therefore what gets referred to the AA." In the quarter ending March 2016, some operators handled millions of complaints but only tens or hundreds of appeals, while others showed much larger appeal totals. That is evidence of classification inconsistency and operator-side process asymmetry, not evidence that consumer oversight is unnecessary. [9]

The market scale today makes the case for independent oversight even stronger. TRAI's March 2026 data show that mobile market shares were approximately Jio 39.21%, Airtel 37.74%, Vodafone Idea 15.68%, and BSNL 7.34%. Applied to the national wireless mobile subscriber base of 1,265.73 million, that is roughly 496.3 million Jio subscribers, 477.7 million Airtel subscribers, 198.5 million Vodafone Idea subscribers, and 92.9 million BSNL subscribers. For operators serving customer bases of that magnitude, it is not credible to argue that appeals should become less independent. [10]

Public company disclosures also suggest that complaint systems operate at very large volumes. Vodafone Idea's FY 2024-25 annual report records 5,789,606 customer complaints filed during the year, with 5,578 pending at

year-end. That disclosure, read together with TRAI's market-share data and historical evidence on low appeal volumes, strongly suggests that the population of complaints requiring deeper contestation is a small but consequential residual layer. That is exactly where a consumer representative belongs. This is an inference from the publicly available data, and it is a reasonable one. [11]

Comparative regulation points in the same direction. Mature jurisdictions do not respond to complaints complexity by removing independent review. Ofcom requires access to independent ADR; it decided in 2025 to reduce the threshold from 8 weeks to 6 weeks, after finding that 94% of complaints were resolved within 6 weeks and that consumers remaining open at 6 weeks should get faster access to ADR. ACMA requires telcos to tell consumers about the Telecommunications Industry Ombudsman at key points in the complaint journey. Singapore IMDA's ADR scheme mandates service-provider participation once the consumer elects ADR, and its process includes both online and manual routes. The FCC routes many telecom billing/service complaints to providers, who must respond within 30 days, and it has a specialist dispute-assistance path for accessibility complaints. The EU EECC also requires availability of out-of-court dispute resolution for end-users. The global pattern is clear: when internal complaint handling is insufficient, regulators add or accelerate independent review; they do not remove it. [12]

For that reason, the draft should retain the Advisory Committee, but modernise it. The right reform is not deletion; it is smarter design: digital

hearings, paper disposal where appropriate, tighter case filtering, fixed time windows, empanelled consumer representatives, and standardized appeal taxonomies.

Comments under the six-pillar framework

Advancement of technology. The draft should be explicitly recast around service-neutral consumer obligations. The Telecom Act, 2023's authorisation model and technology-neutral spectrum provisions support that approach. So does market reality: consumers today access connectivity through mobile broadband, FTTH, Wi-Fi, FWA, and hybrid models that increasingly blur legacy boundaries. Complaint rights, disclosure duties, billing transparency, and escalation rights should therefore apply uniformly across 5G/FWA, FTTH, enterprise-grade broadband offered to retail users, neutral-host arrangements where the consumer experience is mediated by a retail provider, and future 6G-era services. The legal trigger should be the consumer-facing telecommunications service, not the underlying network topology. [13]

Alignment with laws, standards, and regulatory principles. Uniform baseline consumer rights are consistent with the TRAI Act's mandate to protect consumers, ensure QoS, conduct surveys, and operate transparently. They are also consistent with consumer-protection jurisprudence in the broader statutory sense, because the Consumer Protection Act, 2019 recognizes rights to information, hearing, and redress. But consistency also requires proportionality. TRAI's own 2024 QoS regulation already applies to providers under the Telecommunications Act, 2023 while preserving a narrow ISP

exemption for entities with 10,000 or fewer subscribers. If TCCRR now eliminates all size-based proportionality, TRAI should explain why complaint redressal has to be more structurally burdensome than QoS compliance for the smallest providers. A better solution is universal baseline rights with tiered compliance obligations. [14]

Forward-looking regulatory approach. The draft is right to speak to apps, portals, QPRs, audits, and consumer surveys. But future-proof regulation should not hard-code a regulatory preference for one interface or one channel design. It should require outcomes: persistent complaint IDs, omnichannel continuity, interoperable logs, exportable transcripts, auditability, human escalation, and standardised data schemas that TRAI can compare across providers. That kind of architecture is better suited to cloud-native operations, AI triage, digital public infrastructure integration, and future sectoral convergence than a rulebook that focuses narrowly on whether a particular interface exists. [15]

Consumer first, transparency, and protection. The reduction of the consumer's appeal-filing period from 30 days to 15 days should be opposed. Mature regimes generally shorten the time for providers to respond or move consumers faster to independent redress; they do not solve delay by shrinking the consumer's opportunity to appeal. Ofcom is moving from 8 weeks to 6 weeks for access to ADR; the FCC gives providers 30 days to respond to complaints served by the agency; Singapore layers a 14-day pre-ADR notice into a process that culminates in mandatory ADR participation and binding determination. India should therefore keep the consumer's filing

window at 30 days while tightening provider-side disposal timelines and escalation obligations. [16]

The draft's digital-first provisions also need a stronger inclusion spine. The Supreme Court has held that digital access is an intrinsic component of the right to life and liberty, and specifically recognized that digital systems can exclude persons with disabilities, rural populations, senior citizens, and linguistic minorities. The DoT's 31 July 2025 instructions for provisioning telecom services to persons with disabilities require inclusive KYC choice, accessible alternatives, dedicated helpdesks, and trained staff. TRAI's own 2024 QoS analysis says consumers still face problems registering complaints because apps and web interfaces can have complicated workflows and complex navigation. The conclusion is straightforward: digital-by-default is acceptable; digital-only is not. Any mandatory app/web/chatbot provision must be paired with a preserved voice route, a visibly available human agent route, and accessibility by design. [17]

Practical implementation and proportionality. The removal of the turnover-based ISP exemption is justified in principle because turnover is a poor proxy for potential consumer harm. However, the answer is not to make a 5,000-subscriber rural ISP comply in the same way as a 500-million-subscriber national operator. The right model is: universal core rights, proportionate structural obligations. Smaller ISPs should still provide complaint registration, docketing, time-bound resolution, escalation, accessibility, and truthful disclosure. But TRAI can simplify the mechanics for micro and small providers by allowing shared complaint infrastructure, one regional appellate

function, standardized hosted portals, less frequent reporting, and risk-triggered rather than routine deep audit—while keeping consumers’ substantive rights intact. That is also broadly consistent with international practice, where baseline protections are broad but oversight intensity is often matched to risk and scale. [18]

International best practices. The most important global lesson is not that India should copy any one model; it is that all mature regimes are converging on three core design choices: universal baseline rights, independent external redress when internal handling fails, and published performance information. Ofcom-approved ADR, ACMA/TIO escalation, FCC-served complaints and accessibility dispute assistance, EU out-of-court dispute resolution rights, and IMDA’s mandatory ADR participation all point the same way. IMDA also publicly reports provider complaint rates per 10,000 subscribers, complaint resolution rates, and hotline/live-chat waiting times. TRAI should borrow that logic directly: if it wants digital grievance systems and consumer surveys to matter, it should publish comparable complaint-density, resolution, repeat-contact, and waiting-time metrics provider-wise and service-wise. [19]

Recommended changes for TRAI to consider

The following revisions would, in our view, make the regulation genuinely forward-looking, technology-neutral, consumer-centric, and globally benchmarked:

- Retain the Advisory Committee and reform it instead of deleting it. Keep a consumer-representative role at the appellate stage, but allow virtual sittings, document-only disposal for routine cases, strict timelines, and

an empanelled pool of registered consumer organisations or independent consumer experts. The evidence in the draft does not justify deletion; it shows the escalated caseload is limited and targeted. [20]

- **Strengthen the independence of the Appellate Authority.** An AA should not be merely a senior employee with five years' experience. It should be insulated from sales, billing, collections, and customer-acquisition functions; appointed for a fixed term; subject to conflict-disclosure rules; and required to issue reasoned orders. A mixed model with one internal appellate officer plus one external consumer/public-interest member would be stronger and closer to global best practice. [21]

- Do not reduce the consumer's appeal filing window from 30 days to 15 days. Keep 30 days for the consumer, but reduce provider-side response and escalation delays. If TRAI wants faster outcomes, it should compress operator processing time, not consumer rights. [16]

- Adopt universal baseline applicability with proportionate compliance tiers for small ISPs. Remove turnover as the threshold variable, but use subscriber base, complaint volume, and service criticality to calibrate reporting frequency, publication mechanics, and staffing requirements. TRAI already uses a 10,000-subscriber threshold in QoS; it can build from that logic without denying core complaint rights to any consumer. [22]

- Make the grievance architecture digital-by-design but never digital-only. Require omnichannel complaint lodging, persistent ticket IDs, searchable status tracking, downloadable complaint transcripts, bot-to-human escalation, voice support, multilingual disclosures, accessibility conformance, and dedicated PwD assistance. Where AI/chatbots are used, the system should clearly disclose that the user is interacting with AI and provide one-step transfer to a human representative. [23]
- Increase the deterrent value of enforcement and improve public reporting. A penalty of ₹1,000 for improper complaint disposal and ₹5,000 for improper appeal disposal is too low for providers serving tens or hundreds of millions of consumers. TRAI should consider complaint-volume-linked or revenue-linked escalation for repeated or systemic contraventions, longer data-retention periods than one year, provider-wise publication of complaint rates, first-contact resolution, repeat-contact rates, appeal overturn rates, average waiting time, and issue-wise complaint taxonomies. IMDA's complaint-rate-per-10,000 model is particularly worth borrowing. [24]

Open questions and limitations

A fully current, public, provider-wise dataset of appellate complaint volumes for all major operators was not readily verifiable from the public sources we reviewed in the time available. For that reason, the strongest quantitative evidence on complaint-versus-appeal ratios in this note comes from TRAI's own 2016 consultation record, read together with 2025-26 subscriber market

data and Vodafone Idea’s FY 2024-25 public complaint disclosure. That is a high-confidence basis for policy analysis, but it is not a full current operator-by-operator appellate census. TRAI should itself publish such data in standardized form. [25]

On the merits, however, the policy conclusion is clear even on the current evidence: support the widened scope and digital modernization, but strongly oppose the deletion of the Advisory Committee, oppose the shrinking of the consumer appeal window, harden the independence of the appellate tier, protect offline and accessible routes, and raise the level of deterrence and transparency. That would make the final regulation more consistent with the Telecom Act, 2023, the TRAI Act, consumer-protection principles, and mature global telecom regulation. [26]

[1] [2] [7] [8] [16] [20] [21] [24]
https://www.trai.gov.in/sites/default/files/2026-05/Regulation_07052026.pdf

https://www.trai.gov.in/sites/default/files/2026-05/Regulation_07052026.pdf

[3] [14]
<https://www.indiacode.nic.in/bitstream/123456789/1929/1/A199724.pdf>

<https://www.indiacode.nic.in/bitstream/123456789/1929/1/A199724.pdf>

[4] [13] [26] <https://egazette.gov.in/WriteReadData/2023/250880.pdf>

<https://egazette.gov.in/WriteReadData/2023/250880.pdf>

[5] [10] https://www.trai.gov.in/sites/default/files/2026-04/PR_No.53of2026.pdf

https://www.trai.gov.in/sites/default/files/2026-04/PR_No.53of2026.pdf

[6] [15] [18] [22] [23] https://tra.gov.in/sites/default/files/2024-10/Regulation_02082024.pdf

https://tra.gov.in/sites/default/files/2024-10/Regulation_02082024.pdf

[9] [25] https://www.trai.gov.in/sites/default/files/2025-09/Consultation_paper_28_july_2016l.pdf

https://www.trai.gov.in/sites/default/files/2025-09/Consultation_paper_28_july_2016l.pdf

[11] <https://www.myvi.in/content/dam/microsite/pdfs/annual-reports-page/annual-report/2024-25/VIL-Annual-Report-2024-25.pdf>

<https://www.myvi.in/content/dam/microsite/pdfs/annual-reports-page/annual-report/2024-25/VIL-Annual-Report-2024-25.pdf>

[12] [19] <https://www.ofcom.org.uk/phones-and-broadband/service-quality/adr-schemes>

<https://www.ofcom.org.uk/phones-and-broadband/service-quality/adr-schemes>

[17]

<https://cdnbbsr.s3waas.gov.in/s36ee69d3769e832ec77c9584e0b7ba112/uploads/2024/11/20250501496797524.pdf>

<https://cdnbbsr.s3waas.gov.in/s36ee69d3769e832ec77c9584e0b7ba112/uploads/2024/11/20250501496797524.pdf>

Comments on Clause 11 – Registration & Disposal of Appeals (Regulation 14)

Fairness vs Speed – Consumer Protection Perspective

The proposed amendment to Regulation 14 appears to prioritize rapid disposal of appeals through compressed timelines and simplified internal processing. While speedy grievance resolution is an important regulatory objective, the proposed framework must not dilute the fundamental principles of procedural fairness, transparency, natural justice, and reasoned adjudication. In consumer protection jurisprudence, speed is desirable, but fairness is indispensable. A fast but unfair appellate process ultimately weakens consumer confidence, increases repeat complaints, escalates litigation before Consumer Commissions and courts, and undermines the credibility of the telecom grievance redressal ecosystem.

The proposed draft therefore requires important safeguards to ensure that “speed” does not become a substitute for justice. Telecom consumers today face increasingly complex disputes involving wrongful billing, unauthorized deductions, failed recharges, network outages, quality of service deficiencies, SIM misuse, unsolicited commercial communication, cyber-fraud-linked telecom abuse, disconnection disputes, portability failures, accessibility barriers, and misleading tariff practices. Such matters often require examination of technical records, transaction logs, call detail data,

billing history, complaint correspondence, and system-generated evidence. Mechanical disposal within rigid timelines without ensuring meaningful hearing and proper examination may result in superficial justice rather than substantive justice.

The principle of natural justice requires that every consumer must receive:

- adequate opportunity to present the grievance,
- access to relevant records relied upon by the service provider,
- a fair hearing,
- an impartial evaluation of evidence, and
- a reasoned written order explaining the basis of the decision.

If timelines are reduced without strengthening procedural safeguards, appellate proceedings may become mere formalities designed to close complaints administratively rather than resolve disputes fairly. Such an approach would disproportionately harm rural consumers, elderly subscribers, digitally illiterate users, persons with disabilities, low-income prepaid consumers, and consumers lacking technical expertise. These categories of consumers frequently require additional assistance, clarification, and time to present their cases effectively.

The draft amendment must therefore clearly recognize that procedural fairness and consumer rights cannot be sacrificed merely for operational efficiency. Regulatory history itself demonstrates that telecom consumers have repeatedly complained not only about delay, but also about arbitrary closure of complaints without meaningful resolution. An appeal mechanism

exists precisely because first-level complaint handling may fail. If the appellate layer is also reduced to a speed-driven administrative process, the very purpose of appellate review stands defeated.

International best practices also support the principle that internal efficiency must coexist with independent and fair review mechanisms. In the United Kingdom, the communications regulator requires providers to maintain accessible complaint handling systems while preserving the consumer's right to approach independent Alternative Dispute Resolution mechanisms if internal resolution fails. Similarly, in Australia, unresolved telecom disputes may escalate to the independent Telecommunications Industry Ombudsman. These systems emphasize timely handling, but not at the cost of fairness, transparency, and accountability.

The proposed amendment also appears to reduce explicit emphasis on "reasoned written orders." This is a matter of serious concern. A speaking order is the backbone of appellate justice. It ensures accountability, prevents arbitrary disposal, enables regulatory audit, facilitates judicial review if necessary, and assures the consumer that the grievance was genuinely considered. If appeals are disposed through short, template-based closures without proper reasoning, consumers may perceive the process as biased and pre-determined in favor of service providers.

Accordingly, the following principles should be expressly incorporated into Regulation 14:

1. The prescribed disposal timelines should be treated as directory for consumer benefit and not as grounds for mechanical rejection or hurried disposal.
2. The regulation should explicitly preserve the consumer's right to:
 - submit documents and evidence,
 - receive acknowledgment,
 - obtain hearing through physical, telephonic, or digital mode,
 - receive status updates, and
 - obtain a reasoned written order.
3. The regulation should clarify that no appeal shall be rejected merely on technical or procedural grounds without giving the consumer an opportunity to rectify deficiencies.
4. Vulnerable consumers, senior citizens, persons with disabilities, rural consumers, and cyber-fraud victims should receive assisted grievance support and reasonable procedural relaxation.
5. All appellate decisions should contain:
 - issues for determination,
 - facts examined,
 - evidence relied upon,
 - reasons for acceptance or rejection, and
 - specific relief granted or denied.
6. The service provider should maintain digital audit trails of appeals and make anonymized appeal statistics publicly reportable to TRAI for transparency and systemic oversight.

7. The regulation should provide that systemic or repetitive complaints identified during appeal proceedings must be escalated internally for corrective action instead of treating them as isolated individual disputes.
8. Appeals involving billing disputes, disconnections, cyber-fraud-linked telecom misuse, accessibility barriers, or financial loss should receive enhanced scrutiny rather than summary disposal.

The proposed framework should therefore adopt a “fair and timely resolution” model rather than a “speed-only disposal” model. In consumer jurisprudence, justice delayed may be problematic, but justice hurried can be equally harmful. Sustainable consumer trust emerges not from statistical disposal rates, but from transparent, impartial, evidence-based, and consumer-centric grievance resolution.

Suggested Redraft (Consumer-Oriented)

“The Appellate Authority shall endeavor to dispose of appeals expeditiously and preferably within the prescribed timeline; however, such disposal shall be based upon principles of natural justice, fair hearing, transparency, and reasoned adjudication. Every appellant shall be given reasonable opportunity to present evidence, clarify deficiencies, and receive a speaking order containing reasons for the decision. No appeal shall be disposed of mechanically or rejected solely on procedural or technical grounds without affording an opportunity of rectification.”

Such a balanced formulation would align the regulation with constitutional fairness principles, global telecom grievance standards, and the core objective of consumer protection under the telecom regulatory framework.

Comments on Clause 12 – Online Consumer Survey (Regulation 14.A)

The proposal to introduce an Online Consumer Survey after closure of complaints and appeals is a welcome and progressive step. For the first time, the Telecom Consumers Complaint Redressal Regulations seek to measure consumer satisfaction directly rather than relying solely on operational statistics such as number of complaints disposed, disposal timelines, and pendency levels. This aligns with modern consumer-centric regulatory practices and can significantly improve accountability, transparency, and evidence-based regulation.

However, while the proposed Regulation 14.A is conceptually sound, its effectiveness will depend upon the quality, independence, representativeness, transparency, and regulatory use of the survey data. Mere collection of satisfaction ratings without appropriate safeguards may result in distorted outcomes that fail to reflect the actual consumer experience.

General Position

The Consumer Protection Association strongly supports the introduction of mandatory Online Consumer Surveys under Regulation 14.A. However, the

provision should be strengthened to ensure that the survey becomes a genuine consumer empowerment tool rather than a compliance formality.

The objective of grievance redressal is not merely closure of complaints but satisfactory resolution of consumer grievances. A complaint marked as "closed" by a service provider may still remain unresolved from the consumer's perspective. Therefore, measuring consumer satisfaction is an essential complement to measuring operational efficiency. The proposed survey mechanism can help bridge this gap.

Key Consumer Benefits

1. Shifts Focus from Disposal to Resolution

At present, most performance indicators focus on how many complaints are disposed of and how quickly they are closed. Such metrics often incentivize rapid closure rather than meaningful resolution.

The proposed survey introduces an outcome-based metric by asking consumers whether they are actually satisfied with the resolution provided.

This is a significant regulatory improvement because:

- Fast disposal does not necessarily mean fair disposal.
- Closure does not necessarily mean resolution.
- Resolution should be judged by the consumer, not solely by the service provider.

Therefore, consumer satisfaction scores should be treated as a Key Regulatory Performance Indicator (KRPI) alongside complaint disposal statistics.

2. Creates Direct Consumer Voice in Regulatory Oversight

For many years, TRAI has relied primarily on reports submitted by service providers.

The proposed survey introduces a mechanism through which consumers themselves become a source of regulatory intelligence.

This is particularly important because:

- Consumers often experience difficulties not reflected in formal reports.
- Many complaints are technically "closed" while consumers remain dissatisfied.
- Consumer perceptions provide early warning signals of systemic failures.

The survey mechanism can therefore serve as a valuable regulatory feedback loop.

3. Improves Accountability of Service Providers

Public disclosure of consumer satisfaction levels can create healthy competitive pressure among service providers.

When consumers can compare:

- Complaint resolution rates,
- Appeal success rates,
- Satisfaction scores,

service providers will have greater incentives to improve customer service quality.

The proposed publication of survey data through Quarterly Performance Reports is therefore strongly supported.

Concerns and Recommended Improvements

1. Survey Must Not Be Restricted to Online Mode Only

The draft regulation assumes that all consumers can conveniently participate through digital channels.

This assumption is problematic.

Many consumers are:

- Senior citizens,
- Rural subscribers,
- Feature phone users,
- Persons with disabilities,
- Digitally inexperienced consumers.

An exclusively online survey may systematically exclude these categories.

Recommendation:

The regulation should provide:

"Consumer feedback may be collected through SMS, IVRS, mobile application, website, email, assisted telephonic interaction, or any other accessible mode."

This will improve inclusiveness and representation.

2. Survey Must Be Independent of Complaint Closure Incentives

There is a risk that service providers may influence consumer responses through:

- Repeated reminders,
- Selective survey delivery,
- Persuasive messaging,
- Linking survey participation to service benefits.

Such practices may distort results.

Recommendation

The regulation should explicitly provide that:

"Survey participation shall be entirely voluntary and service providers shall not influence, induce, discourage or manipulate consumer responses."

3. Response Rate Must Be Reported

A major weakness in consumer surveys is non-response bias.

For example:

- 1,00,000 complaints closed.
- Only 500 consumers respond.
- Satisfaction reported as 90%.

Such results may not represent actual consumer sentiment.

Recommendation

TRAI should require publication of:

- Total complaints closed.
- Total surveys issued.
- Total surveys responded.
- Response rate (%).

Without response rates, satisfaction data can be misleading.

4. Five-Point Scale Alone is Insufficient

The proposed scale of 1 to 5 provides useful quantitative data but does not reveal why consumers are dissatisfied.

Recommendation

The survey should include optional qualitative questions such as:

- Was your complaint fully resolved?
- Was the resolution explained clearly?

- Was the response timely?
- Would you recommend the grievance process to others?
- What was the primary reason for dissatisfaction?

This information will help identify systemic issues.

5. Separate Reporting for Vulnerable Consumers

Consumer experience varies significantly across different consumer categories.

Recommendation

TRAI should consider separate analysis for:

- Senior citizens,
- Persons with disabilities,
- Rural consumers,
- Women consumers,
- Prepaid consumers,
- Broadband subscribers.

Such segmentation can reveal hidden service deficiencies.

6. Dissatisfaction Must Trigger Regulatory Review

The draft requires collection and publication of survey data but does not specify regulatory consequences for poor performance.

Recommendation

Where:

- More than 25% of respondents rate 1 or 2, or
- Satisfaction falls below a prescribed threshold for two consecutive quarters,

TRAI should initiate:

- Special audit,
- Regulatory review,
- Corrective action plan,
- Targeted inspection.

Otherwise the survey risks becoming a passive reporting exercise.

7. Survey Should Include Appeal-Specific Indicators

Appeals represent the highest internal grievance level.

The survey for appeals should therefore separately ask:

- Whether the consumer received a fair hearing.
- Whether the decision was reasoned and explained.
- Whether supporting evidence was considered.
- Whether the consumer felt treated fairly.

This would help measure procedural fairness in addition to satisfaction.

Additional Consumer-Centric Redraft

The following proviso may be added to Regulation 14.A:

"The Service Provider shall ensure that the survey mechanism is accessible, transparent, non-discriminatory and available through multiple communication channels including SMS, IVRS, mobile application, website, email and assisted telephonic interaction. The survey response shall be voluntary and free from any influence or inducement. The Service Provider shall report not only satisfaction scores but also survey participation rates, category-wise analysis and reasons for dissatisfaction. Persistent low satisfaction levels shall be subject to regulatory review by the Authority."

Conclusion

The Consumer Protection Association strongly supports the introduction of Regulation 14.A because it introduces a long-overdue consumer voice into the telecom grievance redressal framework. However, for the survey to become a meaningful regulatory instrument rather than a procedural formality, TRAI should strengthen the provision by ensuring inclusiveness, transparency, response-rate disclosure, qualitative feedback collection, protection against manipulation, and mandatory regulatory action where persistent dissatisfaction is observed.

A grievance redressal system should ultimately be judged not by how many complaints are closed, but by how many consumers believe their problems were genuinely resolved. Regulation 14.A provides TRAI with an opportunity to make consumer satisfaction the central measure of success in telecom grievance redressal.

Comments on Clause 13 – Quarterly Performance Reports (Regulation 15)

The proposed amendment relating to Quarterly Performance Reports (QPRs) is one of the most significant consumer-centric reforms in the Draft Telecom Consumers Complaint Redressal Regulations. The shift from a limited appeal-focused reporting framework to a broader complaint and appeal reporting mechanism represents a substantial improvement in transparency, accountability, and regulatory oversight. By requiring periodic public disclosure of complaint-handling performance, the regulation has the potential to transform grievance redressal from an internal administrative exercise into a measurable consumer protection instrument.

While the proposed framework deserves strong support, it should be further strengthened to ensure that the published reports genuinely reflect consumer experience and provide meaningful insights into service quality. Mere disclosure of complaint counts and average disposal times may not adequately reveal the true nature of consumer difficulties, recurring service deficiencies, or geographical disparities in service performance. A more comprehensive reporting architecture is therefore necessary.

One of the most important improvements that should be incorporated into the Quarterly Performance Reports is the classification of complaints into Infrastructure and Non-Infrastructure categories. At present, telecom complaints are often grouped together, making it difficult to distinguish between network-related deficiencies and administrative or commercial

failures. This distinction is critical because the corrective measures required for each category differ substantially.

Infrastructure-related complaints generally arise from deficiencies in the telecom network itself, such as poor coverage, call drops, network congestion, broadband outages, transmission failures, recurring service interruptions, inadequate capacity, or delayed restoration following technical faults. These complaints reflect the quality and resilience of the telecom infrastructure available to consumers and often require investment, maintenance, network optimization, or expansion measures.

Non-Infrastructure complaints, on the other hand, arise from billing disputes, wrongful deductions, recharge failures, tariff misinformation, unauthorized activation of services, SIM replacement issues, mobile number portability problems, customer care deficiencies, complaint-handling failures, unsolicited commercial communications, accessibility barriers, and procedural shortcomings. These complaints typically require improvements in customer service processes, internal controls, billing systems, and grievance handling mechanisms rather than network upgrades.

A mandatory Infrastructure versus Non-Infrastructure classification would enable consumers, regulators, policymakers, and service providers to identify whether recurring consumer dissatisfaction originates primarily from technical shortcomings or administrative failures. Such classification would also allow targeted regulatory interventions and improve accountability by

preventing operators from obscuring the root causes of complaints within broad aggregated statistics.

Another significant enhancement would be the introduction of a Repeat Complaint Index. One of the major shortcomings of traditional complaint reporting systems is that they measure the number of complaints disposed of but do not adequately assess whether the resolution was durable. A complaint that reappears shortly after closure is often a stronger indicator of service failure than a complaint that was resolved permanently on the first attempt.

The Repeat Complaint Index would provide a measure of recurring grievances and identify situations where complaints are repeatedly closed without effective resolution. High levels of repeat complaints may indicate superficial fixes, premature closure practices, inadequate root-cause analysis, or systemic service deficiencies. Such an index would shift regulatory attention from merely counting complaint closures to evaluating the quality and sustainability of resolutions.

From a consumer perspective, durability of resolution is just as important as speed of resolution. A grievance mechanism that repeatedly closes and reopens the same complaint cannot be considered effective. Therefore, the Repeat Complaint Index should become a mandatory performance indicator within the Quarterly Performance Reports. Service providers exhibiting high recurrence rates should be required to submit corrective action plans and be subject to enhanced regulatory scrutiny.

The proposed reporting framework should also incorporate detailed geographic mapping of complaints. Reporting at the Licensed Service Area level is useful but often too broad to reveal localized consumer issues. Telecom service quality frequently varies between districts, cities, towns, and rural regions within the same service area. Aggregated reporting can therefore mask serious local deficiencies.

District-wise reporting would allow identification of complaint hotspots and chronic problem areas. Urban-rural segmentation would further reveal disparities in service quality and grievance redressal outcomes. Such granular reporting would assist regulators in identifying underserved regions and would encourage service providers to address localized deficiencies rather than relying on favorable averages across larger service areas.

Geographic mapping would also improve public transparency by enabling consumers to compare service performance in their own areas. This information could influence consumer choice, encourage competition on service quality, and motivate providers to improve network performance in poorly performing regions.

The Quarterly Performance Reports should also move beyond absolute complaint counts and include normalized indicators that permit meaningful comparison between service providers. Large operators naturally receive more complaints due to their larger subscriber bases. Complaint rates should therefore be expressed relative to the number of subscribers or service

connections. Such normalization would enable fair comparison and prevent misleading interpretations based solely on raw complaint volumes.

In addition, the reports should disclose not only average resolution times but also measures that reflect the distribution of delays. Average figures often conceal long-pending complaints and extreme cases of consumer hardship. Publication of median resolution times, delayed complaint percentages, and backlog indicators would provide a more accurate picture of actual consumer experience.

Consumer satisfaction data should remain an important component of the reporting framework. However, satisfaction scores should be accompanied by information regarding participation rates and response levels to ensure that reported satisfaction figures accurately represent consumer sentiment. Low response rates may produce misleading conclusions and should therefore be interpreted cautiously.

The Quarterly Performance Reports should further include information regarding compensation provided to consumers, appeal outcomes, reopening of complaints, and instances where complaints were found to be improperly closed. These indicators would help evaluate not only operational efficiency but also fairness and effectiveness of grievance redressal.

Transparency can be strengthened by requiring publication of reports in accessible digital formats rather than static documents alone. Searchable, downloadable, and machine-readable disclosures would facilitate independent analysis by consumer organizations, researchers, media, and

civil society groups. Such openness would contribute to stronger public oversight and informed consumer decision-making.

The effectiveness of the reporting framework will also depend upon robust data governance. Standardized definitions, common reporting formats, uniform complaint taxonomies, and periodic audits are essential to ensure consistency across service providers. Without standardization, comparative analysis may become unreliable and consumers may be misled by inconsistent reporting practices.

From a consumer protection perspective, the most important objective of Quarterly Performance Reports should be to identify patterns of consumer harm, recurring service deficiencies, and systemic weaknesses before they escalate into widespread dissatisfaction. The reports should therefore serve not merely as compliance documents but as dynamic regulatory tools that support preventive intervention, evidence-based policymaking, and continuous improvement in telecom service quality.

In conclusion, Clause 13 represents a major step forward in strengthening transparency and accountability within the telecom grievance redressal framework. The proposal is strongly supported. However, it should be enhanced through mandatory Infrastructure versus Non-Infrastructure classification, introduction of a Repeat Complaint Index, district-level and urban-rural geographic mapping, normalized complaint metrics, stronger consumer satisfaction reporting, compensation disclosures, and standardized reporting practices. These improvements would transform

Quarterly Performance Reports into a powerful consumer protection mechanism capable of driving meaningful improvements in service quality, grievance redressal, and consumer confidence across the telecommunications sector.

Comments on Clause 14 – Regulatory Review & Financial Disincentives (Regulation 18A)

The introduction of Regulation 18A relating to Regulatory Review and Financial Disincentives is one of the most important and welcome reforms proposed in the Draft Telecom Consumers Complaint Redressal Regulations. A grievance redressal framework can only be effective when compliance obligations are accompanied by meaningful accountability mechanisms. In the absence of enforcement, complaint handling requirements often become procedural formalities rather than genuine consumer protection measures. The proposed provision therefore deserves strong support as it introduces a regulatory mechanism capable of ensuring that consumer rights are respected in practice and not merely recognized on paper.

The telecom sector has undergone significant transformation over the past decade. Telecommunications services have evolved from basic voice communication to essential digital infrastructure supporting financial transactions, digital identity authentication, healthcare services, education, governance, commerce, emergency communications, and social participation. Consequently, deficiencies in telecom services can have serious consequences for consumers, affecting not only convenience but

also economic and social well-being. In such an environment, service providers must be held accountable for maintaining effective complaint redressal systems.

The proposed power of regulatory review is particularly important because complaint statistics alone often fail to reveal the actual quality of grievance resolution. Service providers may report high disposal rates while consumers continue to experience dissatisfaction, repeated complaints, premature closure of grievances, or unresolved service deficiencies. A structured regulatory review mechanism enables the Authority to examine not only numerical performance indicators but also the effectiveness, fairness, and integrity of complaint handling systems.

From a consumer perspective, the Authority should be empowered to conduct periodic and risk-based reviews of grievance redressal performance. Such reviews should examine patterns of complaints, repeat complaint levels, appeal outcomes, consumer satisfaction ratings, timeline compliance, complaint closure practices, and systemic service deficiencies. Regulatory oversight should focus on identifying underlying causes of consumer dissatisfaction rather than merely verifying procedural compliance.

The introduction of financial disincentives is equally important. Experience across regulated sectors demonstrates that voluntary compliance alone is often insufficient to ensure consistent adherence to consumer protection obligations. Financial consequences create a direct incentive for service providers to invest in stronger grievance redressal systems, improve

customer service processes, maintain accurate records, and address recurring consumer issues proactively.

From a consumer welfare perspective, financial disincentives should not be viewed as punitive measures but as instruments of regulatory accountability. Their primary purpose should be to encourage corrective behavior and deter practices that undermine consumer rights. Effective enforcement promotes a culture of compliance and ensures that service providers internalize the cost of poor grievance handling rather than transferring those costs to consumers.

The proposed framework should specifically treat the following practices as serious violations warranting regulatory action:

- Failure to acknowledge complaints within prescribed timelines.
- Delayed resolution of complaints beyond regulatory limits.
- Repeated non-compliance with grievance redressal obligations.
- Improper closure of complaints without resolution.
- Failure to communicate complaint status updates.
- Misclassification of complaints as service requests or queries.
- Failure to maintain accessible complaint channels.
- Submission of inaccurate or misleading performance reports.
- Non-publication of mandatory consumer information.
- Failure to provide accessibility support for persons with disabilities.
- Repeated failure to comply with appellate procedures.

Particular attention should be given to complaint closure practices. Many consumer grievances arise not because complaints remain open, but

because they are closed prematurely without meaningful resolution. Closure statistics should therefore never be treated as the sole indicator of performance. Regulatory review should evaluate whether complaint resolution was durable, fair, and satisfactory from the consumer's perspective.

The Authority should also utilize consumer satisfaction surveys, repeat complaint data, appeal outcomes, and complaint reopening rates as important indicators of service provider performance. A provider demonstrating high complaint closure rates but simultaneously exhibiting high dissatisfaction levels, high appeal rates, or significant complaint recurrence should be subject to enhanced scrutiny. Such patterns may indicate systemic deficiencies that require corrective intervention.

Transparency should form a key component of the enforcement framework. Regulatory findings should be periodically published in the public domain so that consumers can understand how service providers are performing in relation to grievance redressal obligations. Public disclosure of compliance performance can create positive competitive pressure and encourage service providers to improve customer experience.

The regulatory review framework should also incorporate a graduated approach to enforcement. Minor procedural lapses may justify warnings or corrective directions, whereas repeated or systemic violations should attract stronger financial consequences. Persistent non-compliance over multiple

reporting periods should trigger enhanced monitoring, special audits, mandatory corrective action plans, and increased financial disincentives.

Consumer interests would further be strengthened if financial disincentives were linked to measurable performance indicators. Repeated delays in complaint resolution, excessive appeal overturn rates, high repeat complaint levels, chronic non-compliance with reporting obligations, and persistent consumer dissatisfaction should all be considered relevant factors while determining enforcement action. Such an approach would encourage continuous improvement rather than mere minimum compliance.

An important principle that should guide implementation of Regulation 18A is proportionality. The objective should not be to maximize penalties but to maximize consumer protection outcomes. Enforcement should focus on preventing consumer harm, improving service quality, strengthening accountability, and ensuring that grievance redressal systems function effectively. Financial disincentives should therefore be accompanied by requirements for corrective action, process improvement, staff training, system upgrades, and enhanced consumer communication wherever necessary.

The Authority should also retain flexibility to conduct special reviews in cases involving large-scale service disruptions, widespread billing disputes, major network failures, cybersecurity incidents, mass unsolicited commercial communication complaints, or recurring consumer grievances across

multiple service areas. Such proactive oversight would enable early intervention before consumer harm becomes widespread.

From a broader policy perspective, Regulation 18A represents a shift from passive compliance monitoring to active consumer protection governance. It recognizes that consumer rights are meaningful only when supported by effective enforcement mechanisms. A grievance redressal framework without accountability may generate complaints, but it cannot generate consumer confidence.

In conclusion, Clause 14 relating to Regulatory Review and Financial Disincentives is strongly supported from the consumer perspective. The proposed provision has the potential to significantly strengthen accountability, improve complaint handling standards, enhance transparency, and promote better service quality across the telecommunications sector. However, its effectiveness will depend upon rigorous implementation, transparent review processes, objective performance indicators, meaningful financial consequences for non-compliance, and a continued focus on actual consumer outcomes rather than procedural statistics alone. Properly implemented, Regulation 18A can become the cornerstone of a modern, consumer-centric telecom grievance redressal framework that balances regulatory oversight, industry accountability, and consumer welfare.

Additional Consumer-Centric Recommendations on the Draft TCCRR (Beyond the Specific Clauses) :

The proposed amendments to the Telecom Consumers Complaint Redressal Regulations constitute a substantial improvement over the existing framework and introduce several important reforms relating to accessibility, transparency, complaint monitoring, consumer surveys, reporting obligations, and regulatory oversight. However, considering the rapid evolution of telecommunications services and increasing consumer dependence on digital connectivity, there remain several areas where additional consumer-centric safeguards can further strengthen the regulatory framework.

These recommendations are not directly covered under the individual clauses but are important from the broader perspective of consumer welfare, regulatory effectiveness, and future-readiness.

Consumer Rights Charter

Every Telecom Service Provider should be required to publish a standardized Consumer Rights Charter approved by TRAI.

The Charter should clearly explain:

- Consumer rights.
- Complaint filing procedures.
- Appeal rights.
- Compensation entitlements.
- Network quality expectations.
- Protection against unsolicited communications.

- Rights relating to billing and tariffs.
- Rights of vulnerable consumers.

Many consumers remain unaware of their legal protections. A standardized Consumer Rights Charter would improve awareness and reduce information asymmetry between consumers and service providers.

Automatic Compensation Framework

The present framework focuses primarily on complaint resolution but provides limited direct compensation to consumers affected by service failures.

The regulations should introduce automatic compensation for specified events such as:

- Prolonged network outages.
- Delayed restoration of services.
- Wrongful disconnection.
- Failed recharge transactions.
- Delay in refund processing.
- Unauthorized activation of value-added services.
- Failure to comply with prescribed complaint resolution timelines.

Consumers should not be required to file separate claims for obtaining compensation where service provider fault is clearly established.

Such a framework would create strong incentives for preventive compliance.

Special Protection for Senior Citizens and Vulnerable Consumers

The regulations should establish a dedicated grievance category for:

- Senior citizens.
- Persons with disabilities.
- Rural consumers.
- Consumers with limited digital literacy.

These consumers often face greater difficulty in navigating digital complaint systems and understanding procedural requirements.

Special provisions may include:

- Priority complaint handling.
- Assisted grievance registration.
- Extended appeal periods.
- Dedicated customer support channels.
- Human-assisted service options.

Consumer protection should focus particularly on those who face the greatest barriers in accessing remedies.

Telecom Fraud and Cybersecurity Complaints

Telecom networks increasingly serve as the gateway for financial transactions and digital identity systems.

The regulations should introduce a separate category for:

- SIM swap fraud.
- OTP interception complaints.
- Fraudulent mobile number misuse.
- Identity theft linked to telecom services.
- Telecom-assisted cybercrime.

Such complaints should receive expedited handling because delays can result in substantial financial loss.

A dedicated fraud-response mechanism would significantly improve consumer protection.

Mandatory Root Cause Analysis for Repeated Complaints

Many complaints arise repeatedly due to unresolved systemic issues.

The regulations should require service providers to conduct root-cause analysis where:

- Similar complaints exceed a prescribed threshold.
- Complaint recurrence persists over multiple quarters.
- Particular geographic areas exhibit abnormal complaint levels.

Regulators should focus not only on individual complaint disposal but also on eliminating the underlying causes of consumer dissatisfaction.

Independent Consumer Audit Mechanism

Periodic independent audits of grievance redressal systems should be mandated.

The audit should evaluate:

- Complaint registration practices.
- Closure procedures.
- Consumer communication quality.
- Appeal handling.
- Consumer satisfaction levels.
- Accessibility compliance.

Independent audits would provide greater confidence in reported performance data and reduce the risk of self-reporting bias.

Public Telecom Complaint Dashboard

TRAI should establish a centralized public dashboard displaying:

- Complaint volumes.
- Resolution timelines.
- Consumer satisfaction scores.
- Appeal statistics.
- Repeat complaint rates.
- Geographic complaint trends.

A public dashboard would:

- Improve transparency.

- Empower consumers.
- Encourage competition based on service quality.
- Enable evidence-based public discussion.

Consumers should be able to compare service providers before making purchasing decisions.

Mandatory Service Outage Disclosure

Telecom Service Providers should be required to publicly disclose significant service disruptions.

The disclosure should include:

- Nature of outage.
- Geographic impact.
- Estimated restoration timeline.
- Actual restoration timeline.
- Consumer compensation, where applicable.

Consumers often experience outages without receiving any meaningful explanation.

Transparent outage reporting would improve accountability and consumer trust.

Artificial Intelligence Governance in Complaint Handling

As service providers increasingly deploy artificial intelligence and automated decision-making systems, the regulations should require:

- Human review options.
- Transparency regarding automated decisions.
- Audit trails for AI-generated outcomes.
- Protection against algorithmic bias.

Consumers should never be denied meaningful human review solely because a complaint was processed through automated systems.

Complaint Reopening Rights

Consumers should have a right to reopen complaints where:

- The issue reoccurs shortly after closure.
- The resolution proves ineffective.
- New evidence becomes available.

This would discourage superficial complaint closure practices and improve resolution quality.

Stronger Consumer Representation in Regulatory Review

Consumer organizations should be formally involved in periodic review of grievance redressal performance.

Such participation could include:

- Consultation processes.

- Public hearings.
- Consumer advisory panels.
- Structured stakeholder feedback mechanisms.

Consumer voices should remain central to the evolution of the regulatory framework.

Standardized Complaint Classification System

TRAI should prescribe a uniform complaint taxonomy applicable to all service providers.

This would improve:

- Comparability.
- Transparency.
- Regulatory analysis.
- Public understanding.

Uniform classification would prevent inconsistent reporting practices and improve reliability of performance metrics.

Multilingual Consumer Protection Ecosystem

All critical consumer interactions should be available in:

- English.
- Hindi.
- Official state languages.

This should include:

- Complaint registration.
- Appeal filing.
- Consumer education materials.
- Status updates.
- Satisfaction surveys.

Language barriers remain a significant obstacle to effective consumer protection.

Consumer Awareness Obligations

Service providers should conduct periodic awareness campaigns regarding:

- Complaint rights.
- Appeal mechanisms.
- Fraud prevention.
- Telecom safety.
- Consumer protection measures.

An informed consumer is the strongest foundation of an effective grievance redressal system.

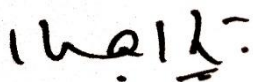
Conclusion

While the proposed amendments significantly strengthen the existing TCCRR framework, the regulations can be made substantially more consumer-centric through additional measures focusing on:

- Consumer rights awareness,
- Automatic compensation,
- Cyber-fraud protection,
- Vulnerable consumer safeguards,
- Independent audits,
- Public transparency,
- Root-cause elimination,
- AI accountability,
- Complaint reopening rights,
- Consumer participation in regulatory oversight.

The ultimate objective of telecom regulation should not merely be complaint disposal but the creation of a transparent, accountable, accessible, and consumer-trust-based ecosystem where consumers receive timely, fair, and effective remedies. These additional recommendations would help transform the TCCRR from a complaint management framework into a comprehensive consumer protection framework for India's rapidly evolving digital communications sector.

Thanks.



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