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8th June 2026

To,

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

Sir,

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

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

We are pleased to attach our comments/suggestions on the above consultation paper.

Thanking you,
Yours Sincerely

GOPAL RATNAM V
Secretary
Consumer Care Society

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

1. Introduction

Telecommunication services today constitute an essential public utility and form the backbone of digital commerce, financial inclusion, governance, education, healthcare, and emergency communication. In this context, an effective consumer grievance redressal framework is indispensable for protecting consumer rights and ensuring accountability of Telecom Service Providers (TSPs).

The proposed Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026 represent a significant attempt to modernise the grievance redressal ecosystem through digitalisation, enhanced transparency, accessibility improvements, and stronger compliance monitoring mechanisms.

From a consumer perspective, the proposed amendments contain several progressive measures. However, certain modifications may weaken consumer safeguards unless accompanied by additional institutional protections and independent oversight mechanisms.

The following comments are submitted from the perspective of protecting consumer rights, improving accountability, and ensuring fair and accessible grievance resolution.

We present our comments with justifications under 3 heads.

- A. Proposed amendments which we endorse
- B. Proposed amendments which we modify
- C. New amendments which we suggest

We strongly urge the Regulator to conduct OHDs on this issue of immense importance to telecom consumer when fundamental changes are being proposed.

A. Proposed amendments which we endorse

There are many consumer-centric modifications and new clauses that we strongly support. These amendments address long-standing concerns relating to poor accessibility to register complaints, inconsistent complaint handling, lack of transparency, delayed appeals, and weak accountability of telecom service providers (TSPs).

1. Expansion of Complaint Filing Channels

The draft regulations permit complaints and appeals through multiple channels like mobile applications, web portals, e-mail, AI/chatbot systems, voice communication, and physical complaint centres.

We welcome this consumer friendly step. Consumers today increasingly interact with telecom services through digital platforms. The earlier framework was excessively dependent on IVRS systems and call centres, which frequently resulted in long waiting times and poor accessibility.

The proposed multi-channel system improves accessibility and convenience. Further it enables easier complaint filing for digitally active consumers and creates verifiable audit trails.

2. 24x7 Complaint Centre Availability

TRAI proposes that the complaint centres are proposed to operate round-the-clock. This reform is imperative in the current scenario. Telecom services are now essential infrastructure supporting digital payments, emergency communication, telemedicine, remote work and online education.

Service disruptions can occur at any time and therefore grievance support must also be continuously available.

Consumer benefits include Improved consumer convenience, Faster reporting of fraud and service outages and Better support during emergencies. This aligns with global digital service standards.

3. Accessibility Measures for Persons with Disabilities (PwDs)

The draft regulations mandates accessible interfaces and assistive technology support. We are highly appreciative of such measures, which highly inclusive for consumers. The amendment advances inclusive digital access and aligns with the Rights of Persons with Disabilities and constitutional principles of equality.

The benefit are of enhanced accessibility and reduction in discrimination in digital communication systems.

4. Consumer Satisfaction Surveys

This we consider the most important improvement proposed in the draft and wholeheartedly support its introduction.

With TSPs required to conduct consumer satisfaction surveys after complaint resolution, there would be a shift from a prefatory approach to complaint handling leading to closure of complaints to ensure compliance to actual consumer satisfaction.

The benefits to consumers and to the telecom sector is immense. The data from the surveys would enable measurable consumer experience improving TSPs accountability and helping in identifying systemic issues quickly. Further it enables outcome-based evaluation.

However to get full advantage of this TRAI should mandate independently audit survey processes and prohibit coercive or misleading survey practices.

5. Publication of Complaint and Performance Information

It is proposed that the TSPs publish complaint-related information and performance reports. This in our view is a positive transparency measure.

Now, Consumers often lack reliable information regarding complaint resolution quality, operator responsiveness and comparative performance.

This change will enables informed consumer choice based on the TSP handling of complaint, Encourages competition based on service quality and facilitates policy research.

6. Financial Disincentives for Non-Compliance

The draft introduces financial disincentives for improper complaint handling, delayed reporting and non-compliance with regulations.

From the Consumer perspective this is a significant and necessary reform and we strongly endorse it. Previous frameworks suffered from weak enforcement due to lack of meaningful consequences for poor complaint handling.

Consumer will benefit as it will strengthen accountability and encourage compliance to the regulation. This will discourages arbitrary complaint closure and improve seriousness of grievance handling.

However we do have concerns regarding this measure as some TSPs Large may absorb modest penalties as routine operational costs. Also the enalties payable only to TRAI may not directly benefit affected consumers.

We therefore suggest that the regulations should have the following modifications.

- increase penalties for repeated violations,
- introduce escalating penalties for systemic failures,
- mandate consumer compensation in appropriate cases.

B. Proposed amendments which we modify

While there are much wanted changes that we have supported in Section A, there are some modifications which have a harmful impact on the consumer grievance redressal and hence we request TRAI to reconsider these changes.

1. Reduced Appeal Filing Time (30 Days → 15 Days)

The Appeal filing period reduced from 30 days to 15 days as TRAI argues dissatisfied consumers usually appeal quickly. We partially agree with this proposition but this may not hold for rural users,elderly users,digitally excluded users and low-literacy consumers.

Consumers generally miss deadlines due various factors of time pressure, other distractions and such would lose the recourse to the remedies,.

We would suggest that TRAI retains the 30-day appeal period or as a compromise change it to 21 days.

2. Removal of Appellate Advisory Committee (AAC)

This change in the regulation is without doubt a retrograde step.

We had on multiple occasions and at different forums communicated to TRAI the various lacunae in the Appellate Advisory Committee (AAC), with one of the most important being the high handedness of the TSPs in dealing with consumer grievances. The other being non-adherence to the various guidelines and regulations on customer complaints.

However, rather than address these concerns and bring improvements in the current AAC, TRAI had turned the clock back by eliminating the AAC.

The appellate authority now proposed is an employee of the TSP and is not independent. They would prioritise company interests, minimise compensation and avoid adverse precedents bringing an Institutional bias into the complaint redressal procedure.

The consumers loose significantly as the quasi-independent scrutiny and participatory review exercised by the Consumer organisations has been removed. This reduces the procedural fairness.

Effectively the appeal system becomes “operator reviewing operator”and is against the principle of natural justice.

When we compare with the situation in other jurisdictions across the world we find that the consumers in India are disadvantaged. UK uses independent ADR bodies, Austrilia has an independent Telecommunications Industry Ombudsman and EU has Independent dispute resolution mechanisms as the table indicates.

India currently lacks a truly independent telecom ombudsman. Hence it is imperative that the AAC be retained with modifications. This we have suggested in Section C along with other options.

SI No	Jurisdiction	Structure	Independent Ombudsman
1	India (2026 Draft)	2-tier TSP system	No
2	UK	Provider + ADR	Yes
3	Australia	Provider + TIO	Yes
4	EU	Provider + ADR	Common
5	USA	FCC complaint escalation	Partial

C. New amendments which we propose

We have mentioned the drawbacks of eliminating the Appellate Advisory Committee (AAC) without any other mechanism for the consumer involvement in the grievance redressal process.

We have here outlined a few suggestions for the consideration of the regulator. **The option 1 of Multi-Stakeholder Consumer Grievance Board is our recommendation. Such a body will be a path breaking one in the Indian context and may be internationally.** The second option of a strengthened AAC is our next preference with the Ombudsman the last choice.

1. Multi-Stakeholder Consumer Grievance Board

A Mediation Board consisting of:

- one representative of the Telecom Service Provider (TSP),
- one representative from a recognised consumer organisation,
- one independent telecom expert or ex- TRAI employee acting as Chairperson,

to review grievances after the appellate stage is, in our assessment, a highly workable and potentially transformative model for India's telecom consumer protection framework.

It addresses one of the most serious structural deficiencies in the present and proposed systems — namely, the absence of an independent, balanced, and consumer-trusted dispute resolution layer between the operator-controlled appellate process and formal judicial mechanisms.

From a regulatory design perspective, such a model combines:

- **participatory adjudication,**
- **technical competence,**
- **consumer representation,**
- **sectoral expertise,**
- **speed and low-cost resolution.**

If properly designed, it could become an effective sector-specific Alternative Dispute Resolution (ADR) mechanism comparable to telecom ombudsman or mediation systems used internationally.

The Mediation Board will be constituted at the level of the Regional Office of TRAI or at State or Telecom Circle level. The Consumer representatives would have to be knowledgeable about the Telecom regulations and hence there is a need for a screening process. The meetings will be virtual.

Strengths of the Proposed Mediation Board

1. Balanced Stakeholder Representation

The proposed composition creates structural balance.

TSP Representative Provides the operational perspective and feasibility inputs, Consumer Organisation Representative Provides consumer rights perspective and procedural fairness scrutiny with Independent Telecom Expert (Chairperson) Provides adjudicatory credibility and informed balancing of interests.

This structure prevents unilateral operator dominance while also avoiding excessively adversarial litigation-style proceedings.

2. Enhances Consumer Confidence

One of the biggest problems in telecom grievance systems is perception of bias. Consumers often believe Complaints are “internally closed,” without a proper and fair review.

The proposed board substantially improves procedural legitimacy because decisions are reviewed outside the immediate TSP hierarchy and the Chairperson provides independent oversight.

This can significantly increase trust in the redressal framework.

3. Faster and Less Expensive than Courts

Most telecom disputes involve small monetary amounts and pertain to billing disputes, service quality issues, outage-related complaints and portability delays. Consumers rarely approach the Consumer Commission because costs exceed claim value, procedures are lengthy and the large amount of time is expended. A mediation board offers fairly inexpensive resolution, simplified procedures, and faster disposal,

This is especially valuable in India where consumer commissions are already heavily burdened.

2. Strengthened Appellate Advisory Committee (Reformed Existing Model)

Retain the current Appellate Advisory Committee (AAC) Structure but the process will be substantially strengthened and streamlined.

The current composition of the AAC would be retained with one member from the TSP and another from the Consumer Organisation.

The Committee would meet every week to ensure that the redressal process is quicker. When the two committee members agree on the resolution it is forwarded to the Appellate Authority who accepts and implements it. In case of disagreement, such complaints would be referred to the concerned regional office of TRAI, where a designated officer would have the deciding vote.

The other modifications is that the tenure of members would be for 2 years, instead of 1 year now and the meetings would be virtual.

3. Independent Telecom Ombudsman Model

Establish a sector-wide independent Telecom Ombudsman funded by industry but operationally independent.

It can be a multi member body with Consumer Rights experts, Telecom technical experts and Legal members.

Consumers approach Ombudsman after failure of complaint resolution at the appellate level or expiry of prescribed timelines. It will have powers to pass binding decisions and direct compensation. It may issue systemic recommendations. Consumer organisations may represent consumers, file representative complaints, participate in policy review panels and assist vulnerable consumers.

Benefits of this model is that it is an Independent and trusted adjudication with faster and specialised dispute resolution. It reduces the burden on all the stakeholders especially the consumer.

However the drawbacks of this proposal is that it requires legislative action. There is also a substantial financial commitment both for the establishment and the operation of the ombudsman.

GOPAL RATNAM V
Secretary
Consumer Care Society