

CUTS Comments on the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026

Date: June 2026

CUTS International welcomes the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026 as an important step towards strengthening India's telecom consumer grievance redressal framework in response to evolving technologies, increasing digital dependence, and changing modes of consumer engagement.

The Draft Regulations introduce several progressive measures aimed at improving accessibility, transparency, and accountability within the grievance redressal ecosystem. In particular, the proposed amendments to Regulation 3, enabling complaint registration and tracking through multiple channels including websites, mobile applications, chatbots, AI-enabled interfaces, and other consumer-centric digital solutions, are commendable. These measures have the potential to improve ease of access, complaint visibility, and convenience for consumers while facilitating more efficient grievance management by service providers. CUTS also welcomes the restructuring of the IVR framework under sub-regulation (9), which introduces explicit categorisation of complaints, appeals, and service requests at the second level, mandates context-specific submenus at the third level, and requires access to a human consumer care representative and a call-back facility at every third-level option. These changes address longstanding consumer pain points around IVR navigation and represent a meaningful improvement in grievance accessibility, particularly for consumers who rely on voice-based channels.

CUTS further welcomes the deletion of the Advisory Committee provisions under Regulations 11 and 13. The committee's advisory-only role, combined with persistent practical challenges including scheduling delays and member unavailability, had rendered it a source of procedural delay rather than consumer benefit. The proposed simplification, supported by strengthened eligibility criteria for Appellate Authority members and enhanced oversight under Regulation 10, is a consumer-positive reform. CUTS notes that the effectiveness of the simplified appellate framework will depend on the robust implementation of these strengthened criteria and oversight mechanisms.

The Draft Regulations also introduce important reforms relating to online consumer feedback mechanisms, accessibility provisions for persons with disabilities, enhanced reporting obligations, and financial disincentives for improper complaint handling and disposal. Collectively, these measures represent a significant step towards modernising the telecom consumer protection framework and strengthening accountability within the sector.

While the Draft Regulations contain several welcome reforms, CUTS has identified certain provisions that may benefit from further clarification or strengthening in order to enhance consumer protection, improve procedural fairness, and ensure effective implementation.

The following table presents CUTS's comments on selected clauses - with the existing provision, suggested amendment, and detailed rationale for each.

| Regulation No. | Regulation, 2026 (Summary) | Suggested Amendments | CUTS Comments & Rationale |
|-------------------------------|--|--|---|
| <p>Regulation 9(3)</p> | <p>Time for filing appeal reduced from 30 days to 15 days.</p> | <p>Amend Regulation 9(3): restore appeal filing period to 30 days. Alternatively insert proviso: “Provided that delay may be condoned by the Appellate Authority upon sufficient cause being shown.”</p> | <p>CUTS Concern: The Draft Regulations introduce several important measures to improve the efficiency, accessibility, and transparency of the grievance redressal framework. However, the proposed reduction in the appeal filing period from 30 days to 15 days may inadvertently limit consumers’ ability to seek review of grievance outcomes, particularly in cases involving billing disputes, recurring deductions, KYC-related deactivation, SIM replacement issues, or service deficiencies whose impact may not be immediately apparent.</p> <p>The shorter timeline may disproportionately affect rural consumers, senior citizens, persons with disabilities, and consumers with limited digital literacy, who may require additional time to understand the grounds of complaint disposal, obtain supporting records, and access the appellate mechanism.</p> <p>Comparative Indian Legal Frameworks:</p> <ul style="list-style-type: none"> • RBI Integrated Ombudsman Scheme allows escalation after 30 days of non-satisfactory response. <p>Policy Rationale: While timely disposal of grievances is an important objective, procedural timelines should not operate as barriers to access. An effective appellate mechanism should provide consumers with a reasonable opportunity to evaluate the response received and decide whether further review is necessary.</p> |

| Regulation No. | Regulation, 2026 (Summary) | Suggested Amendments | CUTS Comments & Rationale |
|--|---|--|--|
| | | | <p>CUTS Recommendation: The existing 30-day appeal period should be retained. Alternatively, appeals filed beyond 15 days may be admitted where sufficient cause is shown, thereby balancing timely grievance resolution with consumer accessibility.</p> |
| <p>Regulation 10, Regulation 14, Regulation 18. A</p> | <p>The sector specific grievance redressal framework does not provide an independent telecom ombudsman or external review mechanism within the telecom regulatory architecture.</p> | <p>Insert new Regulation 14.B establishing “Independent Telecom Consumer Ombudsman.” Proposed provision: “(1) The Authority shall establish an Independent Telecom Consumer Ombudsman mechanism for adjudication of unresolved consumer grievances. (2) A consumer may approach the Ombudsman where: (a) appeal is rejected; (b) no appeal decision is communicated within prescribed timeline; or (c) consumer disputes improper closure/disposal of complaint or appeal. (3) The Ombudsman shall have powers to direct reopening of complaints, refund, compensation, corrective action, and compliance measures.”</p> | <p>CUTS Concern: While the Draft substantially modernises procedural aspects of complaint handling, the grievance redressal and appellate mechanisms continue to operate primarily within the service provider’s internal framework. While such arrangements may facilitate efficient resolution of consumer complaints, consumers who remain dissatisfied after disposal of an appeal do not have access to an independent sector-specific review mechanism. The absence of an external review forum may affect consumer confidence in grievance outcomes, particularly in cases involving disputed complaint closures, billing disputes, service deficiencies, or repeated grievances.</p> <p>Evidence and Regulatory Practice:</p> <ul style="list-style-type: none"> • The RBI Integrated Ombudsman Scheme, 2021 provides consumers access to an independent redressal mechanism where a regulated entity fails to resolve a complaint within 30 days or where the consumer remains dissatisfied with the resolution provided. The framework recognises |

| Regulation No. | Regulation, 2026 (Summary) | Suggested Amendments | CUTS Comments & Rationale |
|----------------|----------------------------|----------------------|--|
| | | | <p>that internal grievance redressal mechanisms and independent review serve complementary functions.</p> <ul style="list-style-type: none"> • Similar independent review mechanisms exist in the insurance and electricity sectors, providing consumers with an avenue of recourse beyond the service provider's internal complaint handling process. (Insurance Ombudsman Rules, 2017 and Consumer Grievance Redressal Forum/Ombudsman mechanisms under the Electricity Act, 2003) <p>Policy Rationale: Internal grievance redressal mechanisms and independent review mechanisms perform complementary functions. While service providers are best placed to resolve complaints in the first instance, consumers who remain dissatisfied after exhausting internal remedies may benefit from access to an impartial review forum. Such a mechanism can strengthen consumer confidence, improve accountability, and enhance the credibility of the telecom grievance redressal framework without undermining the objective of timely dispute resolution.</p> <p>CUTS Recommendation: TRAI may consider providing an independent review mechanism, such as a Telecom Consumer Ombudsman or second-level external appellate forum, for consumers who remain dissatisfied after exhaustion of the internal grievance</p> |

| Regulation No. | Regulation, 2026 (Summary) | Suggested Amendments | CUTS Comments & Rationale |
|----------------------------------|---|---|--|
| | | | <p>redressal process. Such a mechanism would complement the existing framework and further strengthen transparency, accountability, consumer confidence, and the overall credibility of the telecom grievance redressal system.</p> |
| <p>Regulation 18.A(4)</p> | <p>TRAI proposes financial disincentives of ₹1,000 per improper dismissal/disposal of complaint and ₹5,000 per improper dismissal/disposal of appeal, subject to a maximum cap of ₹50 lakh per quarter per licensed service area. However, the Draft does not define “improper dismissal/disposal.”</p> | <p>Insert Explanation under Regulation 18.A(4): “For the purposes of this regulation, ‘improper dismissal/disposal’ shall include: (a) closure without substantive resolution of grievance; (b) closure without communicating reasons to consumer; (c) closure based solely on automated or templated response; (d) closure despite non-compliance with applicable tariff order, regulation, direction, or consumer protection provision issued by the Authority; (e) closure without adequate review of supporting evidence submitted by consumer; (f) closure due to consumer non-response without reasonable follow-up attempts across multiple communication modes; (g) disposal of appeal without recording findings and reasons.” Further insert: “Consumers shall have right to seek reopening of complaints improperly disposed within 30 days of closure.”</p> | <p>CUTS Concern: The introduction of quantified financial disincentives for improper dismissal or disposal of complaints and appeals is a significant step towards strengthening accountability within the grievance redressal framework. However, the Draft Regulations do not define what constitutes an “improper dismissal” or “improper disposal” of a complaint or appeal.</p> <p>In the absence of clear regulatory standards, there may be uncertainty regarding the circumstances under which financial disincentives would be attracted. This may result in inconsistent implementation and make it difficult to objectively assess whether a complaint has been genuinely resolved or merely disposed of procedurally.</p> <p>TRAI’s Explanatory Memorandum notes increasing consumer dissatisfaction with existing grievance redressal mechanisms and identifies concerns regarding the effectiveness of complaint handling and resolution.</p> <p>The proposed framework seeks to impose financial disincentives for improper disposal. However, unlike other performance and compliance parameters prescribed under</p> |

| Regulation No. | Regulation, 2026 (Summary) | Suggested Amendments | CUTS Comments & Rationale |
|----------------|----------------------------|----------------------|---|
| | | | <p>telecom regulations, the trigger for such penalties has not been clearly defined. In practice, complaints may be closed through generic responses, automated communications, or unilateral closure by the service provider without necessarily addressing the underlying consumer grievance. The absence of objective standards may make it difficult to distinguish between genuine resolution and procedural closure.</p> <p>Policy Rationale: Given that Regulation 18.A(4) creates a penalty framework linked to improper complaint handling, the term “improper dismissal/disposal” should be clearly defined within the Regulations. Such definition may include, inter alia, closure without substantive resolution, closure without adequate examination of the consumer's grievance, closure based solely on automated or generic responses, or disposal without communicating the basis of the decision to the consumer.</p> <p>CUTS Recommendation: TRAI may consider inserting an Explanation under Regulation 18.A(4) that enumerates the specific circumstances constituting "improper dismissal/disposal" of complaints and appeals. This would enhance regulatory certainty, promote consistency in enforcement, and strengthen consumer confidence in the grievance redressal process. Additionally, TRAI may consider introducing, a right for</p> |

| Regulation No. | Regulation, 2026 (Summary) | Suggested Amendments | CUTS Comments & Rationale |
|----------------|----------------------------|----------------------|---|
| | | | consumers to seek reopening of complaints that have been improperly disposed of, within a stipulated timeframe. |