

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

Date: June 19, 2026

CUTS International welcomes the Draft Notification on the Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026 as an important step towards strengthening consumer protection in India's telecommunications sector. As telecommunications services increasingly serve as a gateway to digital payments, financial services, e-governance, education, healthcare, and social participation, it is essential that regulatory frameworks evolve to safeguard consumer interests in an increasingly digital ecosystem.

The proposed amendments introduce several consumer-centric measures aimed at improving accessibility, enhancing the effectiveness of grievance redressal mechanisms, strengthening accountability of service providers, and ensuring a more seamless consumer experience.

While telecom service providers have raised concerns regarding certain proposed obligations, CUTS submits that such concerns must be assessed in light of the broader objectives of consumer welfare, regulatory effectiveness, and public interest. Consumer protection measures should not be diluted where they seek to address existing gaps in accessibility, accountability, transparency and quality of service.

The following table presents CUTS International's counter-comments along with the rationale on the representations made by telecom service providers regarding the proposed amendments.

S No.	Issue /Provision	Comments Made by Telecom Service Providers (TSPs)	CUTS Counter Comments & Rationale
1.	24x7 Access to Human Support	TSPs have opposed the requirement to provide round-the-clock access to human customer care representatives, citing increased operational, staffing, and infrastructure costs.	CUTS supports the Authority's proposal requiring telecom service providers to ensure round-the-clock access to human customer care representatives. Telecommunications services are no longer limited to voice communication. They serve as a critical gateway to digital payments, banking services, e-governance platforms, healthcare, education, employment opportunities, and emergency communications. Consequently, any disruption, unauthorised activity, SIM-related fraud, wrongful service suspension, or account access issue can have immediate and significant consequences for consumers.

S No.	Issue /Provision	Comments Made by Telecom Service Providers (TSPs)	CUTS Counter Comments & Rationale
			While automated systems, chatbots, and AI-enabled interfaces may facilitate routine transactions, they are often inadequate in addressing complex, urgent, or exceptional circumstances that require human judgment and intervention. Consumers frequently encounter situations involving disputed charges, fraudulent SIM swaps, unauthorised service activations, identity-related concerns, or prolonged service disruptions where timely access to a human representative may be necessary to resolve the issue effectively and mitigate potential financial loss or inconvenience. Further, access to a human representative is particularly important for vulnerable consumer groups, including senior citizens, persons with disabilities, first-time digital users, and consumers with limited digital literacy. A grievance redressal framework that relies predominantly on automated systems may inadvertently create barriers for consumers who are less comfortable navigating digital interfaces and therefore depend more heavily on direct human assistance. The requirement for 24x7 human support should therefore be viewed not merely as a customer service obligation, but as an important consumer protection measure. Given the indispensable role of telecommunications services in daily life and the digital economy, consumers should have access to timely human assistance whenever serious issues arise, rather than only during restricted operating hours. Accordingly, CUTS submits that the proposed requirement should be retained, as it would strengthen consumer protection, improve accessibility of grievance redressal mechanisms, facilitate timely resolution of consumer concerns, and enhance consumer confidence in the telecommunications sector.

S No.	Issue /Provision	Comments Made by Telecom Service Providers (TSPs)	CUTS Counter Comments & Rationale
2.	Standardised Complaint and Escalation Menus on IVRS and Mobile Applications	TSPs have objected to the proposal requiring a standardised three-level menu structure across IVRS platforms and mobile applications, arguing that service providers should retain flexibility in designing customer interfaces according to their operational requirements.	Standardising the complaint pathway does not mean standardising the entire interface. TSPs can still design their apps and IVRS systems as they choose, the only requirement is that the steps to file a complaint, check its status, and escalate it follow a consistent structure across operators. That is a narrow and specific ask, not a broad restriction on interface design. This consistency matters because consumers should not need to learn a different complaint process every time they deal with a different operator, or every time they switch operators. A standardised structure makes the grievance redressal process predictable and easy to use, which directly supports faster complaint resolution and reduces the chances of consumers giving up midway because the process felt confusing or unfamiliar. The proposal sets a minimum common structure, not a ceiling. TSPs remain free to add extra features, design elements, or improvements on top of this baseline. Since the TSPs have not pointed to any specific operational difficulty this requirement would create, their objection remains general rather than substantive. Accordingly, CUTS supports the proposed measure as a reasonable and proportionate step towards improving accessibility and consumer experience.
3.	Complaints Relating to Network Experience and Service Quality	TSPs have sought exemptions from complaints relating to poor network experience, contending that service deficiencies may arise from third-party applications, operating systems, device	CUTS is of the view that complaints relating to network quality and service performance should continue to be addressed through the grievance redressal framework. Consumers subscribe to telecom services with the expectation of receiving reliable connectivity and quality service. Poor network performance directly affects communication, digital payments, and access to public services, education, work, and other essential online activities. Consumers generally lack the technical expertise required to determine the precise cause of a service deficiency. Requiring them to identify whether a problem

S No.	Issue /Provision	Comments Made by Telecom Service Providers (TSPs)	CUTS Counter Comments & Rationale
		hardware, or other factors beyond their control.	originates from the network, device, or application would create an unreasonable burden and may undermine their ability to seek effective redress. In practice, consumers experience only the outcome (a dropped call, a failed transaction, a slow connection) and have no way of knowing which layer is responsible. Requiring them to identify the cause before their complaint is even accepted would shift the burden of diagnosis from the party best equipped to perform it (the service provider) to the party least equipped to perform it (the consumer), and may result in valid complaints being dismissed at the very first step. This does not mean TSPs must be held responsible for factors genuinely outside their control. Where investigation shows that a complaint arises from a third-party application, device fault, or other external factor, the provider may close the complaint and communicate this finding to the consumer with clear, specific reasons. What should not happen is exemption from the duty to investigate in the first place - a provider must show its reasoning, not simply categorise a complaint as ‘out of scope’ without examination. Accordingly, complaints concerning network quality, connectivity, and service performance should remain fully within the scope of the consumer grievance redressal framework, with the responsibility for receiving, examining, and responding to such complaints resting with the service provider at all times.
4.	Implementation Timeline	TSPs have requested a deferment of implementation by approximately six to nine months, citing the need for system upgrades, process modifications, and operational readiness	CUTS recognises the need for reasonable implementation timelines. However, implementation timelines must be assessed in light of the objectives underlying the proposed amendments, namely strengthening consumer protection, improving accessibility of grievance redressal mechanisms, and enhancing accountability in consumer service delivery. Many of the proposed measures relate to customer care processes, complaint handling procedures, accessibility improvements, and reporting mechanisms that

S No.	Issue /Provision	Comments Made by Telecom Service Providers (TSPs)	CUTS Counter Comments & Rationale
			build upon systems already maintained by telecom service providers. Consequently, prolonged delays in implementation may defer the intended consumer benefits and perpetuate challenges currently faced by consumers in accessing effective grievance redressal. While genuine operational constraints may warrant limited transitional arrangements, such considerations should be balanced against the broader public interest. Any extension of implementation timelines should therefore be supported by clear justification, limited to the specific requirements requiring additional preparation, and remain proportionate to the nature of the changes involved.
5.	Financial Disincentives for Non-Compliance	TSPs have opposed the proposed financial disincentives for non-compliance, arguing that the penalties are excessive and may impose a disproportionate financial burden on service providers.	Financial disincentives are an important regulatory tool for ensuring compliance with consumer protection obligations and strengthening accountability within the grievance redressal framework. Given the inherent imbalance in bargaining power between individual consumers and large service providers, effective enforcement mechanisms are necessary to ensure that regulatory obligations are implemented in practice. The proposed disincentives are intended to promote compliance and improve service standards rather than impose punitive sanctions. They incentivise service providers to maintain effective complaint handling systems, address consumer concerns promptly, and ensure timely resolution of consumer grievances. Consumers often bear the consequences of poor complaint handling through financial loss, service disruption, inconvenience, and delayed resolution of legitimate concerns. Financial disincentives therefore serve as an important mechanism to encourage adherence to prescribed standards and strengthen consumer confidence in the telecom sector. While concerns regarding proportionality may be addressed through transparent enforcement procedures and clearly defined compliance parameters, the underlying

S No.	Issue /Provision	Comments Made by Telecom Service Providers (TSPs)	CUTS Counter Comments & Rationale
			mechanism of financial disincentives remains necessary to secure effective implementation of the regulatory framework. Accordingly, the Authority should consider retaining the proposed provisions to strengthen accountability and ensure that consumer protection objectives are realised in practice.