



30 May 2026
Chennai

To
Shri. Vivek Khare
Advisor (CA)
Telecom Regulatory Authority of India
Government of India

Sub: Submission of Comments on the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026

Respected Sir,

Greetings from Citizen consumer and civic Action Group (CAG)!

Citizen consumer and civic Action Group (CAG) is a 40-year-old, non-profit, non-political, and professional organisation that works towards protecting citizens' rights in consumer and environmental issues, and promoting good governance processes including transparency, accountability, and participatory decision-making.

CAG appreciates the opportunity provided by the Telecom Regulatory Authority of India (TRAI) to submit comments on the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026.

The proposed amendment introduces several important consumer-centric measures intended to modernise the telecom grievance redressal framework. Provisions relating to mandatory web and mobile-based complaint systems, multilingual support, accessibility measures for Persons with Disabilities (PwDs), complaint monitoring systems, and enhanced transparency obligations are positive initiatives that have the potential to improve consumer accessibility and accountability if implemented effectively.

At the same time, the proposed amendments also raise serious concerns regarding increasing dependence on automated systems, weakening of independent consumer participation mechanisms, and the growing concentration

of grievance redressal processes entirely within Telecom Service Providers (TSPs).

Please find below our views and suggestions on the proposed amendments.

General Comments

1. Removal of Advisory Committee

The proposed amendment suggests the removal of the Advisory Committee from the grievance redressal process. The explanatory memorandum states that routing appeals through the Advisory Committee has rendered the appellate process “inefficient and ineffective”.

In this regard, it is important to note that the issue lies not in the existence of the Advisory Committee itself, but in the manner in which the mechanism has been implemented by the Telecom Service Providers (TSPs) over the years.

In practice, complaints and appeals are often processed internally by the TSPs and subsequently placed before consumer representatives merely as procedural formalities for documentation and sign-off purposes. Meaningful consultation, discussion, and participation are often absent. These implementation deficiencies have been brought to the attention of the Authority during various stakeholder meetings in the past.

Therefore, instead of removing the Advisory Committee entirely, there is a need to:

- Strengthen monitoring and accountability mechanisms
- Ensure meaningful participation of consumer representatives
- Mandate periodic review and reporting
- Ensure proper implementation of the existing framework by TSPs

Consumer organisations and Advisory Committee members continue to play an important role in assisting telecom consumers, particularly in cases where grievances are not adequately addressed by the TSPs. Removing the mechanism entirely may weaken participatory oversight, reduce external accountability, and adversely impact consumer confidence in the grievance redressal framework.

2. Increasing Dependence on AI and Automated Systems

The proposed amendments place significant emphasis on IVRS systems, AI-based grievance handling, chatbots, mobile applications, and automated complaint systems.

While such systems may improve accessibility and operational efficiency for basic and repetitive issues, consumers already face practical difficulties such as:

- Endless IVRS loops
- Difficulty in connecting with human representatives
- Limited complaint categories
- Inability to explain unique or unidentified issues
- Automated responses without meaningful resolution

Many telecom grievances are routine, day-to-day, low-cost but highly essential service-related issues affecting communication, banking access, work, education, and digital participation. Such grievances often require direct human interaction and intervention for effective resolution.

Accordingly:

- AI and automated systems should assist grievance handling and not replace human interaction
- Consumers should have direct and easily accessible options to connect with human representatives
- Human assistance should not be made dependent upon completion of multiple IVRS or AI layers
- Traditional grievance channels should continue alongside digital grievance systems

3. Premature or Improper Closure of Complaints

The proposed timelines and consumer satisfaction survey mechanisms are welcome initiatives. However, there is also a need to address the issue of premature or improper closure of complaints by TSPs.

Consumers frequently experience situations where:

- Complaints are automatically closed
- Generic responses are treated as resolution
- Service requests are closed without actual resolution
- Complaint statistics are artificially improved through premature closure practices

Accordingly, the Authority may consider:

- Ensuring that no complaint or service request is automatically closed without consumer confirmation
- Introducing OTP-based or consent-based closure mechanisms
- Allowing consumers to reopen unresolved complaints
- Conducting periodic audits regarding complaint closure practices

4. Accessibility for Persons with Disabilities (PwDs)

The inclusion of accessibility provisions for Persons with Disabilities (PwDs) is highly appreciated and welcome. However, effective implementation and monitoring are equally important.

The Authority may therefore consider:

- Strict monitoring of accessibility compliance by TSPs
- Accessibility audits across websites, apps, portals, IVRS systems, and chatbot platforms
- Appropriate enforcement mechanisms and penalties for non-compliance

5. Need for Stronger Monitoring and Enforcement

Several consumer protection mechanisms already exist within the telecom sector; however, implementation and monitoring continue to remain major concerns.

Accordingly, there is a need for:

- Periodic compliance reporting by TSPs
- Monitoring of actual grievance resolution quality and not merely disposal statistics
- Periodic audits and inspections
- Review of Advisory Committee functioning and complaint handling systems
- Stronger enforcement and accountability mechanisms wherever necessary

Overall, while several proposals contained in the draft amendment are positive and consumer-centric, there is a need to ensure that increasing digitalisation and automation do not dilute human accessibility, participatory oversight, transparency, accountability, and consumer confidence within the grievance redressal framework.

Detailed Clause-wise Comments

SI No	Existing / Proposed Provision	Comments
1	Regulation 3 – 24x7 Complaint Centres	The proposal for round-the-clock accessibility of complaint centres is a welcome move considering the essential nature of telecom services. However, there is a serious concern that this may gradually promote excessive dependence on IVRS and AI-based systems while reducing meaningful human interaction. Consumers already face difficulties in explaining issues that do not properly fit predefined IVRS categories. AI and IVRS systems may help address basic issues; however, direct human interaction remains essential. Consumers should have a direct and dedicated option to connect with human agents without being forced through multiple IVRS or AI layers. Human assistance should remain mandatory and easily accessible at all times.
2	Regulation 3 – Mandatory app/website-based complaint systems	Digital complaint systems are a welcome initiative. However, these systems should be designed in a manner that allows consumers to provide detailed inputs and explain issues freely, rather than limiting complaints only to predefined categories. Such systems should supplement and not replace customer care interactions. Additionally, WhatsApp-based complaint management systems may also be explored as an accessible and practical option, particularly for younger consumers and digitally active users.
3	Regulation 3 – AI agents/chatbots	AI systems should assist grievance handling and not become an end-point preventing consumers from reaching human representatives. Human accountability and direct interaction remain



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		essential components of effective grievance redressal systems.
4	Regulation 3 – Accessibility for Persons with Disabilities (PwDs)	The inclusion of accessibility provisions is highly appreciated and necessary. However, these obligations should be mandatory and strictly enforced. Accessibility standards should apply across websites, mobile applications, portals, IVRS systems, and AI/chatbot platforms. Violations and non-compliance should attract penalties and enforcement action.
5	Regulation 5 – Consumer Corner and public disclosure	The proposal to establish dedicated Consumer Corners and improve public disclosure is a positive initiative. However, TRAI should ensure periodic monitoring and compliance verification by TSPs. Periodic reporting and review mechanisms should be introduced to assess actual implementation and accessibility of such disclosures (updated).
6	Regulation 8 – Complaint resolution timelines	<p>Reduced timelines for grievance redressal are important, especially in the present day, where people work from home and rely more on internet/ broadband/ net-connectivity services.</p> <p>At the same time, there should not be premature or artificial closure of complaints merely to improve compliance statistics. No complaint or service request should be auto-closed. TSPs should obtain explicit consumer confirmation, preferably through OTP-based mechanisms, before closure of complaints or service requests. The Authority should also ensure that TSPs undertake internal operational reforms to improve actual grievance resolution quality</p>
7	Regulation 9 – Reduction of appeal filing	This is accepted.

	timeline from 30 days to 15 days	
8	Regulation 10 – Strengthening Appellate Authority	Requiring senior management officials with adequate experience to function as Appellate Authorities is a positive step and may strengthen accountability within TSPs. However, this cannot replace the need for external consumer participation (CAG representatives registered with TRAI) through the Advisory Committee mechanism.
9	Regulation 11 – Removal of Advisory Committee	Removal of the Advisory Committee mechanism will be detrimental to consumer interest. Consumer advocacy groups act as an important bridge between consumers, TSPs, and the regulator. The existing deficiencies in the functioning of Advisory Committees arise primarily from lack of meaningful implementation and monitoring, and not from the concept of consumer participation (CAG representatives registered with TRAI) itself. Instead of removing the mechanism, TRAI should strengthen monitoring, ensure genuine participation, and establish structured accountability mechanisms for TSPs. Removing the Advisory Committee risks creating a grievance framework that may weaken transparency, accountability, and consumer confidence.
10	Regulation 14b (2)	The 15 days for resolution of complaints in the appeal process may be further reduced to 10 days considering the various tech tools available, and also consumers’ demand for quick resolution. If there is likely to be a delay for technical reasons or otherwise, the appellate office may communicate the same to the consumer within 5 days of receipt of the appeal, with clear mention of the extended time required to resolve the issue, along with reasons.



		Similarly, in cases of refund, the refund should be processed within 3 days instead of the 15 days that is being taken now.
10	Regulation 14A – Consumer Satisfaction Survey	Introduction of consumer feedback systems is a positive initiative. However, the survey template, methodology, questions, and implementation framework should be developed in consultation with consumer organisations and CAG representatives to ensure fairness, transparency, and reliability of feedback mechanisms.
11	Regulation 15 – Quarterly Performance Reports	The proposal requiring quarterly reporting and publication of complaint and appeal data is a positive and welcome step towards improving transparency and accountability. However, the Authority should ensure that such reports are made publicly accessible in simple and consumer-friendly formats. The reports should also contain meaningful indicators relating to actual grievance resolution quality and not merely disposal statistics. Periodic review and verification mechanisms may also be introduced to ensure accuracy and reliability of the data submitted by TSPs.
12	Regulation 18A – Regulatory Review and Financial Disincentives	The proposal to introduce regulatory review, audits, and financial disincentives is welcome in principle and may help strengthen compliance by TSPs. However, the effectiveness of such provisions will depend upon strong monitoring and enforcement by the Authority. The Authority may also consider strengthening enforcement mechanisms for repeated violations and ensuring periodic review of complaint disposal practices, consumer feedback mechanisms, and grievance handling quality.

Conclusion



CAG appreciates TRAI's efforts to modernise and strengthen telecom consumer grievance redressal systems in response to evolving technologies and changing consumer engagement patterns.

Several proposals contained in the draft amendment, including digital grievance systems, accessibility provisions, multilingual support, complaint monitoring systems, and transparency obligations, are positive and consumer-centric initiatives.

However, consumer protection cannot be reduced merely to digitalisation, automation, timelines, and reporting metrics. Telecom grievance redressal systems must remain transparent, accountable, inclusive, accessible, and genuinely consumer-centric in practice.

CAG is particularly concerned that the proposed removal of the Advisory Committee mechanism may substantially weaken consumer participation and external accountability within the grievance redressal framework.

The Authority should therefore focus on strengthening oversight, ensuring meaningful participation of consumer groups, improving monitoring mechanisms, and safeguarding human accessibility within grievance systems rather than eliminating institutional consumer participation mechanisms.

CAG respectfully urges the Authority to reconsider the proposed removal of the Advisory Committee and strengthen the above aspects to ensure that the final regulatory framework remains balanced, transparent, inclusive, and truly consumer-centric.

We thank the Authority for the opportunity to submit our comments and look forward to continued engagement on issues relating to telecom consumer protection and grievance redressal.