



June 18, 2026

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

Dear Sir,

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

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

First of all, we welcome most of the proposed amendments of TRAI as it 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.

We had submitted our comments to the above-mentioned draft regulations earlier, and presently, we would like to reiterate our views on some of the points made earlier:

- 1. 24X7 complaint centres:** The proposal for round-the-clock accessibility of complaint centres is most welcome, considering the essential nature of telecom services. However, there is concern that this may increase reliance on IVRS and AI-based systems, while reducing direct human interaction. Consumers already face difficulties when their complaints do not fit into predefined IVRS categories. While IVRS and AI systems may help resolve basic issues, human interaction remains essential. **IVRS systems should be simple, and Consumers should have a direct and easy option to**

speak to a human agent, without being required to go through multiple IVRS or AI layers.

- 2. Complaint resolution and timelines:** Complainants should get a proper closure/ resolution for all sorts of complaints, including network related complaints. In the present day, some complaints, for example, internet/ network related complaints are often closed without providing a proper resolution, which is unfair to the consumer. If the problem is due to external sources, that should be clearly mentioned/ explained as the reason, and TSPs should obtain explicit consumer confirmation, preferably through OTP-based mechanisms, before closure of complaints or service requests.
- 3.** 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 / 30 days that is being taken now, which is unnecessary and against consumers' interest.

- 4. Financial disincentives** - The proposal to introduce regulatory review, audits, and financial disincentives is welcome in principle and may help strengthen compliance by TSPs.
- 5. The proposal for Removal of Advisory Committee** should be revisited as 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.
- 6.** In the interest of consumers, the amendments should be notified immediately without any delays.

