



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

Consumer Guild, Lucknow, a registered consumer organization/Consumer Advocacy Group member of TRAI, respectfully submits the following comments on the **Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026** issued on 7 May 2026.

Consumer Guild welcomes the proposed amendments, which aim to strengthen telecom consumer grievance redressal mechanisms through enhanced accountability, transparency, digital accessibility, and stricter timelines. The draft framework reflects a progressive, transparent, and consumer-centric regulatory approach. However, we respectfully object to the proposed complete removal of Regulation 11, which seeks to eliminate the Advisory Committees and the role of consumer organizations. Such an omission may reduce the effectiveness of an otherwise robust and consumer-centric framework.

We support the deletion of the proviso relating to continuation of old docket numbers under the 2007 regulations. This will facilitate a streamlined, technology-driven, and uniform complaint tracking system. While deletion of obsolete transitional provisions may be administratively justified, TRAI should ensure preservation, traceability, and accessibility of legacy complaint records to protect consumer rights in pending or future legal proceedings.

The stipulation that complaints and service requests (where no specific timeline is prescribed) shall be resolved within three (3) days is highly consumer-friendly and will significantly improve service responsiveness.

### **Appellate Mechanism**

We strongly support the requirement that Appellate Authorities must be regular senior management employees with at least five years of experience. This will ensure greater professionalism, accountability, and consistency in handling appeals. The mandate for wide publication and display of Appellate Authority details across newspapers, websites, mobile applications, complaint centers, offices, and sales outlets is a welcome step that will enhance consumer awareness and accessibility.

We appreciate the provision enabling consumers to file appeals through multiple channels — email, websites, mobile applications, complaint centers, post, and in-person. This multi-channel approach promotes digital inclusion and consumer convenience.

While the reduction in the appeal filing period from thirty (30) days to fifteen (15) days may enable faster dispute resolution, **TRAI should ensure adequate public awareness campaigns regarding the revised timeline so that no genuine consumer is disadvantaged.**

### **Institutional Accountability and Reporting**

We fully support the requirement for quarterly reports on complaints, appeals, and consumer surveys to be placed before the Chief Executive Officer (CEO) and/or Board of Directors of telecom service providers. This will institutionalize higher-level oversight and accountability.

The earlier absence of effective monitoring of Appellate Authorities had led to delays, non-resolution, and consumer dissatisfaction. Periodic senior management review addresses this critical gap.

Consumer Guild strongly endorses the mandate for telecom service providers to submit comprehensive quarterly performance reports on complaints and appeals for each Licensed Service Area (LSA) and to publish the same on their websites, portals, and mobile applications within fifteen (15) days from the end of every quarter.

Public disclosure of Key Performance Indicators (KPIs) will promote transparency and allow regulators, researchers, and consumer organizations to objectively evaluate the effectiveness of grievance redressal systems.

We recommend that these reports be published in a simple, consumer-friendly format and should mandatorily include the following indicators:

- Number of complaints received;
- Average complaint resolution time;
- Percentage of complaints resolved within prescribed timelines;
- Number of appeals filed and disposed;
- Consumer satisfaction levels;
- Pending complaints and appeals; and
- Category-wise break-up of major complaints.

Such reports should remain publicly accessible for a minimum of three (3) years. TRAI may also consider prescribing a standardized dashboard format for uniformity and better comparability across service providers and LSAs.

## **Consumer Surveys, Charters and Oversight**

We welcome the introduction of online consumer surveys and feedback mechanisms. These are vital for assessing the real-world effectiveness of grievance redressal from the consumer's perspective. Surveys should be conducted in Hindi, English, and official languages and made accessible via SMS, mobile apps, websites, IVR, and email for maximum inclusivity.

Consumer Guild supports the strengthening and wider implementation of Consumer Charters. These should be prominently displayed in Hindi, English, and other official languages across all platforms, including websites, apps, customer care interfaces, retail outlets, and complaint centers.

We endorse TRAI's proposal for periodic regulatory review through audits, inspections, analysis of reports, and consumer feedback. This will improve compliance and service quality.

**With regard to financial disincentives, we submit that the proposed penalties of ₹1,000 for mishandled complaints and ₹5,000 for improperly disposed appeals should be credited directly to the affected consumer as compensation for inconvenience and deficiency in service.**

## **Advisory Committees:-**

Consumer Guild opposes the proposed deletion of Regulation 11 relating to Advisory Committees under the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026. Such exclusion would significantly weaken participatory consumer oversight within the telecom grievance redressal ecosystem and dilute the consumer-centric spirit of the Draft Regulations.

The Advisory Committee mechanism was originally conceived to ensure that the voices of telecom consumers are institutionally represented in the grievance review process. Consumer organizations perform a unique and indispensable role that individual consumers are often unable to fulfill effectively. Telecom disputes increasingly involve highly technical issues relating to tariff interpretation, billing architecture, network congestion, data throttling, spam regulation, service quality benchmarks, digital fraud, SIM-related misuse, and emerging technology platforms. Individual consumers frequently lack the technical expertise, documentation capacity, or regulatory understanding. **The Advisory Committee serves as a mandatory advisory buffer within the Appellate Authority mechanism.** It ensures that before a service provider's Appellate Authority rules on a dispute, a balanced panel consisting of a consumer representative and an industry member reviews the case and offers an impartial recommendation. Eliminating this layer removes independent stakeholder participation from the final tier of the internal grievance process.

The justification for complete removal of ADVISORY COMMITTEE has not been adequately demonstrated in the draft. If concerns exist regarding operational delays, transparency, or standardization of committee functioning, such concerns can be addressed through procedural reforms, virtual meeting & digital monitoring, fixed timelines, attendance requirements, or standardized reporting mechanisms rather than complete abolition of advisory committees.

Consumer Guild therefore strongly recommends that: **Retention of Regulation 11 and Consumer organization Representation in Advisory Committees.**

**Conclusion** :- Consumer Guild, Lucknow, welcomes the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026 as a significant and progressive reform that will strengthen accountability, transparency, accessibility, and consumer protection in the telecom sector. We appreciate TRAI's ongoing efforts to safeguard consumer rights and enhance service quality across the country. However, to ensure these reforms are successfully realized on the ground, we explicitly request that the Advisory Committee system not only be continued but be significantly strengthened with a strict, time bound framework for dispute evaluation and meeting intervals. Introducing binding timelines within the committee's operational guidelines will prevent delays, enforce accountability on Telecom Service Providers (TSPs), and ensure that grassroots consumer insights are acted upon swiftly to protect citizen rights.

We remain available for any further discussion or clarification.