

Mathur, Subodh

From: Vivek Khare <adv.ca@traigov.in>
Sent: 13 June 2026 00:15
To: Shailesh Rajpoot
Cc: Mathur, Subodh
Subject: [EXT] Fwd: Comments on Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026

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Advisor (CA)
Telecom Regulatory Authority of India
New Delhi
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==== Forwarded message =====
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To: <adv.ca@traigov.in>
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Date: Fri, 12 Jun 2026 23:45:14 +0530
Subject: Comments on Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026
==== Forwarded message =====

To, ù
The Advisor (Consumer Affairs) ù
Telecom Regulatory Authority of India ù
New Delhi. ù

Respected Sir, ù

At the outset, GTPL Broadband Private Limited (GTPL) extends its sincere appreciation to the Telecom Regulatory Authority of India (TRAI) for its proactive efforts toward strengthening consumer grievance redressal mechanisms. We welcome the Authority's vision to align the prevailing regulatory framework with evolving digital technologies and changing consumer expectations. ù

As a prominent standalone Internet Service Provider (ISP) dedicated to deepening broadband penetration across our service areas, GTPL respectfully submits the following constructive feedback. Our suggestions focus primarily on optimizing operational efficiencies by removing legacy compliance burdens that no longer offer incremental benefits to the digital-first consumer. ù

1. Rationalization of Regulation 3(7): Dispensing with Mandatory Toll-Free Consumer Care Numbers for Standalone ISPs ù

Reference: *Regulation 3(7) – Requirement mandating that the Consumer Care Number shall be toll-free.* ù
Justification & Context: ù

- Evolution of the Voice Tariff Ecosystem: Today, the Indian telecom ecosystem stands completely transformed. With virtually all consumers subscribing to data plans bundled with unlimited voice calling, voice calls are effectively free of cost for end-users. Consequently, the original consumer protection rationale for toll-free numbers has become redundant.
- Paradigm Shift to Digital-First Support: Consumer engagement patterns have shifted dramatically over the last decade. Broadband users inherently prefer seamless, real-time digital and self-service channels over traditional voice-based systems. Today, our consumers overwhelmingly engage via:
 - Dedicated Mobile Applications
 - Interactive Web Portals
 - Instant Messaging Frameworks (e.g., WhatsApp Business)
 - Chatbots and Email Support
- Alignment with TRAI's Digital Focus: We note that the Draft Regulations progressively mandate robust digital grievance registration, tracking systems, and automated notifications. Forcing standalone ISPs to maintain an additional, capital-intensive toll-free voice infrastructure creates an unnecessary duplication of systems without delivering measurable value to the consumer.
- Disproportionate Compliance for Standalone ISPs: Unlike integrated, full-service telecom operators, standalone ISPs operate on lean infrastructure. Maintaining toll-free routing arrangements, managing specialized vendor setups, and absorbing recurring usage-based telephony costs place an unnecessary financial and operational overhead on ISPs, distracting resources from network expansion.
- Regulatory Parity with the Broadcasting Sector: TRAI has already rationalized legacy requirements of Toll free number for Cable TV/Distribution Platform Operators (DPOs) by recognizing alternative communication modalities. We request a similar, forward-looking regulatory approach for the broadband sector.

Our Suggestion:

The requirement under Regulation 3(7) to mandate a toll-free Consumer Care Number should be made optional for Internet Service Providers. ISPs should be allowed the flexibility to provide customer care through an optimized mix of regular telephone numbers, mobile applications, interactive websites, WhatsApp, chatbots, and email communication.

2. Modernization of Information Dissemination: Discontinuation of Mandatory Newspaper Advertisements

References: *Regulations 6(2)(a), 6(2)(b), 10(3), and allied provisions requiring periodic publications in national/regional newspapers.*

Justification & Context:

- Obsolescence of Print Media for Consumer Utility: In the internet era, consumers seeking corporate information, tariff structures, or appellate authority details look to real-time digital repositories. Print advertisements are transient; consumers do not archive newspaper clippings for future grievance references.
- Availability of Real-Time, Searchable Alternatives: The Draft Regulations already incorporate stringent mandates for direct, targeted communication via SMS, email, app notifications, and website dashboards. These mediums are inherently superior to print media as they are instantaneous, easily searchable, and permanently accessible to the specific subscriber.
- Lack of Measurable Regulatory Outcome: Over the years, the industry has directed significant financial resources toward publishing multi-lingual newspaper advertisements. However, there is no empirical evidence to suggest that print advertisements have materially improved consumer awareness, expedited complaint resolution, or enhanced overall customer satisfaction.
- Alignment with Green Governance and Digital India Initiatives: Moving away from mandatory print advertisements directly supports the Government of India's core directives regarding paperless governance, environmental sustainability, and the digitalization of public information.
- Centralized Digital Repositories: Between TRAI's official website and the service providers' dynamic web portals, consumers already have access to fully transparent, updated public disclosures that far exceed the utility of a static, one-time newspaper layout.

Our Suggestion: ù

The requirement for periodic newspaper advertisements should be entirely discontinued. Instead, compliance regarding public disclosure and consumer awareness should be deemed satisfied through mandatory publication via: ù

1. The Service Provider's official website/homepage (via a dedicated 'Consumer Information' link).
2. Direct consumer-targeted digital communications (SMS, Email).
3. Verified official Social Media handles of the Service Provider, where applicable.

Conclusion ù

While GTPL stands fully committed to TRAI's objective of safeguarding consumer interests and elevating service quality benchmarks, we urge the Authority to adopt a technology-neutral, digitally-driven, and proportionate regulatory approach. Eliminating legacy compliance mandates like toll-free lines and print advertisements will allow standalone ISPs to reallocate capital toward upgrading network resilience, enhancing cyber security, and building superior digital self-care modules. ù

We thank the Authority for considering our submissions and remain available to provide any further data, clarifications, or oral inputs as may be deemed necessary. ù

Yours Faithfully, ù

For GTPL Broadband Private Limited, ù

Arpit Raval ù

Regulatory Affairs ù

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