

Mathur, Subodh

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Sent: 05 June 2026 09:46
To: Shailesh Rajpoot
Cc: Mathur, Subodh
Subject: [EXT] Fwd: Comments on the issues on Draft amendment.

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Subject: Comments on the issues on Draft amendment.

Secretary
Telecom Regulatory Authority of India (TRAI)
New Delhi

Subject: Comments on the Consultation Paper on Consumer Complaint Redressal Mechanism

Sir/Madam,

This is a suggestion submitted by CAG Member Pramod Kumar Jhawar, Chairman, Maruti Seva Samiti, Udaipur, regarding the consultation paper issued by TRAI regarding changes to the consumer complaint redressal mechanism in the telecom sector.

Currently, TRAI's role is primarily limited to formulating regulations and creating awareness among consumers about filing complaints. However, in reality, filing and pursuing complaints is itself a very difficult task for consumers. Telecom Service Providers (TSPs) often try their best to ensure that complaints do not reach the appellate authority level. There are hundreds of examples where consumers are not given docket numbers when they complain on complaint number 198, so it's clear that an appeal is impossible. It's also important to clarify that in rural areas, consumers don't have smartphones, but rather simple phones with a built-in keyboard. In such a situation, filing complaints is impossible, and the CAG member acts as a strong link between the consumer and the telecom service provider.

Another example can illustrate my point: TSPs organize consumer outreach programs as directed by TRAI. TSPs are expected to ensure maximum attendance at such programs to discuss their complaints. However, the event venue typically has only 20-25 chairs, and more than half of them are occupied by TSPs. This means that even these programs organized by TSPs have become a mere formality. Even in such events, the presence of CNGs plays a significant role.

Under these circumstances, the role of Consumer Advocacy Groups (CAGs) as members of the appellate authority, while making TSPs fully responsible for handling complaints, becomes crucial. The proposal to eliminate this role could adversely impact consumer interests. It would, in effect, give TSPs complete freedom to handle consumer complaints without any independent oversight. The role of the CAG member in the complaint resolution process should be further strengthened.

The CAG's current role in the complaint resolution process serves as an essential safeguard for consumers. Their presence ensures transparency, accountability, and trust among telecom consumers. Removing the CAG from the appeals system could undermine consumer confidence in the fairness of the system.

If TRAI still wants to move towards a TSP-driven complaint handling system, certain safeguards are crucial:

A consumer helpline, such as the National Consumer Helpline (NCH), should be independently monitored and not solely controlled by TSPs.

A dedicated team comprising TRAI officials and representatives from the CAGs should regularly monitor and review the functioning of the complaint handling system for the benefit of consumers.

TRAI should hold regular open house sessions where the nature, volume, and quality of complaints against TSPs can be openly discussed for the benefit of consumers.

Since many consumers already face difficulties even in filing complaints, consumer-friendly systems should be developed. Currently, consumers are often expected to resolve technical issues themselves before TSPs can address their complaints. If this approach continues, TSPs should also provide consumers with proper training and guidance when providing telecom connections.

The digital complaint system should be simple, multilingual, and accessible to senior citizens, rural consumers, and those who are not tech-savvy.

It appears that under the proposed framework, the role of CAGs may gradually be reduced to mere consumer awareness activities, and that process is being increasingly cumbersome. This raises fears that TRAI may eliminate the role of CAGs altogether in the long run.

Consumer participation and independent representation are essential components of any effective grievance redressal system. Therefore, the role of CAGs should be strengthened rather than by, and meaningful participation of consumer organizations.

It's also worth noting that DND doesn't have a provision for filing a complaint and appealing if it's not resolved. Having an appeal provision will expedite the resolution of DND complaints.

Pramod jhanwar