

# PRAN POLICY RESEARCH ACTION NETWORK FOUNDATION



EMPOWERING PEOPLE · ADVANCING JUSTICE · PROTECTING RIGHT

(CIN: U88900HR2026NPL141904 | NGO Darpan: HR/2026/0995847 | 12A & 80G Approved)

To,

The Secretary  
Telecom Regulatory Authority of India (TRAI)

Via Email: [adv.ca@traigov.in](mailto:adv.ca@traigov.in)

Dear Sir,

I am writing on behalf of PRAN Foundation (Policy Research Action Network Foundation) to submit our comments on the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulation, 2026, as released by the Telecom Regulatory Authority of India (TRAI).

Please find attached our detailed comments and recommendations, submitted within the prescribed timeline, for the kind consideration of the Authority. Our submission focuses on strengthening human accountability in digital complaint systems, ensuring inclusive and accessible grievance mechanisms, enhancing transparency, and embedding substantive consumer remedies within the regulatory framework.

We respectfully request that our comments be taken on record and placed on the TRAI website along with other stakeholder submissions. We would be pleased to provide any further clarifications or participate in any follow-up discussions or consultations that the Authority may consider appropriate.

Thank you for the opportunity to contribute to this important consumer protection initiative.

Yours faithfully,

Advocate Amarjeet Singh  
Founder, PRAN Foundation (Policy Research Action Network Foundation)



**Subject:** Comments on the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulation, 2026

### PART I – INTRODUCTORY SUBMISSIONS

PRAN Foundation welcomes the initiative undertaken by the Telecom Regulatory Authority of India to modernise the telecom consumer grievance framework through the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulation, 2026 (“Draft Regulation”).

The proposed amendments rightly acknowledge that telecommunications services have evolved into essential digital infrastructure impacting banking and digital payments, Aadhaar-linked services, welfare access, employment, education, emergency communication, and participation in the digital economy.

PRAN appreciates the Authority’s efforts toward digital complaint mechanisms, improved accessibility, enhanced reporting obligations, streamlined appeal processes, and strengthened compliance monitoring. However, while the Draft Regulation represents an important advancement, certain structural gaps require attention to ensure effective, transparent, and rights-oriented consumer protection.

The following comments are submitted clause-wise for the Authority’s consideration.

### PART II – CLAUSE-WISE COMMENTS AND RECOMMENDATIONS

Draft Provision	PRAN Observations	Recommendations
Expansion of complaint handling through digital modes including apps, portals, chatbots and electronic systems	The recognition of digital complaint channels reflects present-day consumer realities and is a welcome reform. However, excessive reliance on automated systems may create barriers to effective grievance resolution. Consumers increasingly face chatbot loops, auto-generated responses, and complaint closures without meaningful human review.	The regulation should expressly provide that: (i) no complaint shall be finally disposed solely through automated systems; (ii) consumers shall have a right to human review upon request; and (iii) complaint systems using AI or automated workflows shall maintain auditable records of grievance disposal.
Provisions relating to complaint registration and complaint centres	The proposal to expand accessibility through digital complaint centres is positive. However, digitally excluded consumers may face difficulties accessing app-based systems.	Telecom service providers should be mandated to maintain: (i) multilingual grievance systems; (ii) offline complaint options (such as telephone and in-person); (iii) accessible mechanisms for elderly consumers and persons with

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Draft Provision	PRAN Observations	Recommendations
		disabilities; and (iv) regional language support consistent with linguistic diversity.
Time-bound complaint handling obligations	Timelines are necessary for accountability. However, telecom disruptions today may affect essential services such as banking authentication, digital payments, emergency communication, and welfare access.	Separate expedited timelines should be prescribed for complaints involving: complete network outage; wrongful SIM deactivation; disruption affecting OTP delivery or digital payments; and emergency communication failure.
Appeal mechanism before Appellate Authority	While simplification of the appeal mechanism is welcome, the grievance framework continues to remain institutionally embedded within the telecom operator structure. This may affect public confidence and perceptions of impartiality.	TRAI should consider establishing: (i) an Independent Telecom Consumer Ombudsman; (ii) regional independent appellate benches; or (iii) externally supervised grievance review mechanisms to ensure independence and credibility.
Complaint closure procedures	Consumers frequently receive automated “issue resolved” messages despite unresolved grievances. Administrative closure without consumer confirmation undermines trust in grievance systems.	No complaint should be treated as resolved unless: (i) the consumer confirms satisfaction; or (ii) a reasoned speaking order is issued after escalation review, clearly recording the basis for closure.
Financial disincentives for non-compliance	Introduction of financial disincentives is a positive regulatory development and aligns with the need for deterrence. However, penalties may not sufficiently deter repeated non-compliance by large telecom corporations.	TRAI should consider: (i) escalating penalties for repeat violations; (ii) public disclosure of repeat non-compliant operators through periodic reports or dashboards; and (iii) compensation-linked enforcement mechanisms ensuring that consumers receive appropriate redress in addition to penalties.
Reporting obligations	Enhanced reporting requirements improve regulatory accountability. However, public transparency remains limited, and consumers have	Telecom service providers should be required to publish periodic public grievance dashboards containing at least: (i) complaints received; (ii) disposal timelines; (iii) unresolved complaints; (iv) appellate outcomes; and (v) service-failure

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Draft Provision	PRAN Observations	Recommendations
Consumer protection framework under digital grievance architecture	The Draft Regulation modernises procedural mechanisms but does not sufficiently address substantive consumer remedies. Consumers increasingly suffer economic and opportunity loss from telecom failures affecting banking, work, education, and digital access.	TRAI should introduce a mandatory compensation framework for: (i) prolonged service outage; (ii) wrongful disconnection; (iii) failed portability; (iv) billing errors; and (v) repeated unresolved complaints, with clear eligibility criteria and minimum compensation thresholds.
General regulatory framework	The Draft Regulation correctly recognises the evolution of consumer engagement patterns but stops short of recognising telecom connectivity as essential digital infrastructure.	TRAI may consider formally recognising that telecom services today constitute essential digital infrastructure with broader socio-economic implications extending beyond conventional commercial service delivery, and align the grievance architecture accordingly.

## PART III – ADDITIONAL POLICY SUBMISSIONS

### 1. Need for Human Accountability in Automated Systems

The increasing digitisation of grievance redressal mechanisms must not result in algorithmic denial of justice. Consumers should not be compelled to navigate endless chatbot loops, automated closures, or inaccessible escalation systems without meaningful human intervention.

The regulatory framework should therefore guarantee human oversight, transparent escalation pathways, and reviewable grievance decisions, including the right to seek human review of any complaint processed through automated systems.

### 2. Telecom Connectivity as Essential Infrastructure

Telecom services today directly affect financial inclusion, governance access, digital identity verification, employment, education, healthcare access, and emergency communication. Disruption of telecom services may therefore produce consequences extending far beyond ordinary consumer inconvenience.

The grievance redressal framework should accordingly adopt a consumer-rights and public-interest oriented approach, treating telecom connectivity as essential infrastructure foundational to digital citizenship.

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### 3. Need for Substantive Consumer Remedies

Procedural complaint disposal alone cannot constitute effective consumer protection. Meaningful consumer redressal requires accountability, compensation, transparency, and enforceable corrective mechanisms.

Without substantive remedies, grievance systems risk becoming procedural formalities rather than instruments of consumer justice. The final regulation should embed a clear, predictable, and enforceable compensation and corrective-action framework

### PART IV – CONCLUSION

PRAN Foundation respectfully submits that the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulation, 2026 represents an important step toward modernising India’s telecom consumer protection framework. The proposed reforms appropriately recognise evolving digital engagement models, technological transformation, and the growing importance of accessible grievance mechanisms.

However, the regulatory framework can be significantly strengthened through independent oversight mechanisms, safeguards against automated complaint disposal, mandatory compensation provisions, enhanced transparency obligations, and inclusive accessibility standards.

India’s telecommunications ecosystem now forms the foundation of digital participation and socio-economic access for millions of citizens. The grievance redressal framework must therefore evolve from a narrow customer-service model toward a genuinely consumer-centric, rights-oriented, and accountable regulatory architecture.

**Submitted Respectfully,**

*A Singh*

Adv. Amarjeet Singh

Founder, PRAN – Policy Research Action Network Foundation.