



VIL Comments to the TRAI’s Consultation Paper on “Draft notification Telecom Consumers Complaint Redressal (Fourth Amendment) Regulation, 2026” dated 07.05.2026

At the outset, we are thankful to the Authority for giving us this opportunity to provide our comments to the TRAI’s Consultation Paper on “Draft notification Telecom Consumers Complaint Redressal (Fourth Amendment) Regulation, 2026” dated 07.05.2026.

We also place on record our appreciation for the Telecom Regulatory Authority of India (TRAI) for issuing the present consultation on the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026. The Authority has, over the years, played a pivotal role in strengthening the consumer grievance redressal framework in the telecom sector by introducing structured processes, defined timelines, and transparency measures.

We also acknowledge the Authority’s efforts in the current draft to modernize the grievance redressal mechanism in line with technological advancements and changing consumer behavior, particularly through provisions relating to using of modern digital interfaces (like AI agents, chatbots) and standardized processes. These initiatives are well aligned with the ongoing digital transformation of the telecom ecosystem and are expected to further improve accessibility, responsiveness, and overall consumer experience.

We would also like to apprise the Authority that our Customer Services team follow extensive process improvements on an ongoing basis which has led to steady decrease in service complaints. Beyond handling inbound complaints, our Customer Services team proactively identifies potential process/system breakpoints before they impact users. The team continuously study customer processes to take preemptive action based on dynamic, future-oriented requirements. With such proactive steps being taken, imposing additional compliance burdens and financial disincentives will only discourage Telecom Service Providers from driving independent innovation. We recommend that the regulatory framework should focus on measurable output and impact instead of prescriptive rigid process/regulation.

In this context, we welcome the opportunity to provide our comments and suggestions with a view to contributing constructively towards a robust, balanced, and future-ready regulatory framework. Kindly find below VIL comments to certain provisions of the draft Regulations for Authority’s kind consideration:

A. REGULATION 1(a)(3) and 2(f)

- (a) (3) These regulations shall apply to all service providers having, --*
- i. Unified Access Service Licence,*
 - ii. Unified Licence with Authorization for Access Service*
 - iii. Internet Service Authorization under any licence*



iv. Any of the Authorization under the Telecommunication Act, 2023, for providing Access (Wireline, Wireless) or Internet Services;

(f) "Broadband" means a data connection, through wireless or wireline access media, that is able to support interactive services including Internet access and has the capability of delivering the minimum download speed, as specified by licensor from time to time, to an individual subscriber from the point of presence (POP) of the service provider intending to provide broadband service.

VII Comments

1. With respect to Regulation 1(3)(a) defining the applicability of the regulations, it is submitted that while the draft appropriately seeks to align the scope of applicability with the evolving authorization framework under the Telecommunications Act, 2023, the present formulation may benefit from further expansion to ensure a comprehensive and technology-neutral coverage of all entities providing telecom services to consumers.
2. In this regard, it is submitted that the scope of applicability should explicitly include Unified License (GMPCS authorization) holders also, who are permitted to provide telecommunication services directly to end consumers. GMPCS operators, by the nature of their service offering, are allowed to provide voice and data connectivity to subscribers, often in areas where terrestrial telecom infrastructure may be limited or unavailable. From the perspective of a consumer, the nature of services availed—namely communication services—remains comparable to those offered by access service providers or internet service providers. Accordingly, consumers of GMPCS services are equally likely to face service-related issues, billing concerns, connectivity challenges, or other grievances that require an effective redressal mechanism.
3. It is therefore important that all categories of service providers offering telecom services to consumers are brought within the ambit of a unified and consistent consumer grievance redressal framework. Excluding GMPCS licensees from the applicability of these regulations may lead to regulatory gaps and an uneven level of consumer protection across different service segments. It may also result in differential treatment of consumers purely based on the underlying technology or mode of service delivery, which would be contrary to the principles of technology neutrality and regulatory parity that underpin modern telecom regulation.
4. Furthermore, as satellite-based communication services are expected to expand significantly in the coming years, including for underserved and remote regions, it becomes even more critical to ensure that subscribers of such services have access to standardized, transparent, and time-bound grievance redressal mechanisms. Incorporating GMPCS licensees within the scope at this stage would ensure regulatory consistency and prevent the need for future piecemeal amendments as the sector evolves.
5. In view of the above, it is respectfully proposed that Regulation 1(3) may be suitably modified to explicitly include GMPCS license holders and Regulation 2(f) should also mention wireless media including terrestrial or Satellite. This would ensure uniformity in consumer protection, promote



regulatory parity across service providers, and strengthen the overall grievance redressal ecosystem in the telecom sector.

B. REGULATION 1(c)

“(c) These shall come into force after 30 days from the date of their publication in the Official Gazette.”

VIL Comments

1. We submit that the Draft Regulation in present shape entails substantial changes to customer-service platforms, network interfaces, IT systems, call center set-up, reporting architecture and cross-functional operating processes.
2. Each and every change in the system, processes, call center set-ups, which will be brought out eventually through an amendment in the Regulation, will require its own time for implementation.
3. Therefore, in consideration to the breadth and complexity of regulatory and technical requirements as proposed under the Draft Regulations, we strongly urge the Authority to provide adequate and realistic timelines for implementation, which would not be less than 2 to 3 quarters from the date of issuance of amendment to the Regulation.
4. Even If the Authority prescribes the timelines for implementation, there should be a provision for these timelines to be suitably re-prescribed after a thorough assessment by TSP(s) as well as through collaboration and engagement with TRAI.

C. REGULATION 2(pa)

(pa) "Service Query" means any query made by the consumer regarding the services provided by the Service Provider;

VIL Comments

We recommend that the above definition may be amended as follows:

"Service Query" means any query made by the consumer regarding the services provided by the Service Provider or services availed by the consumer;"

D. REGULATION – 3 (1), THIRD PROVISO,



“(1) for the words "local language of that service area in addition to Hindi and English", the words "official language/ languages of the state(s) in the licensed service area, in addition to Hindi and English as per the option exercised by the consumer " shall be substituted,”

VIL Comments

India has 28 states and 8 union territories with 22 scheduled languages, alongside numerous regional languages like Mizo, Khasi, Garo, and Jaintia. Currently, VIL’s IVR services support 17 languages i.e. 14 scheduled plus 3 (English, Chhattisgarhi, and Bhojpuri).

However, the volume of calls at our IVR is heavily concentrated over five languages thus, driving 85% of daily traffic (Hindi-57%, Bengali-%, Marathi-8%, Gujarati-7% and Tamil-4%). The remaining scheduled languages account for only 5% of the population. Notably, Urdu speakers make up most of this remaining segment and can alternatively seamlessly use Hindi based services, which leaves all other languages combined at just 1%.

Expanding IVR support to these low-volume languages presents significant challenges. It requires substantial one-time and ongoing operational costs, increases implementation effort, and risks degrading overall IVR performance by overcomplicating the system architecture.

Therefore, we request the Authority to drop the changes related to the additional languages proposed in the draft Regulation.

E. REGULATION – 3

“3. Every Complaint Centre shall be accessible to the customers ~~between 0800 hrs and 2400 hrs~~ round the clock on all days of the week.”

VIL Comments

1. The existing regulatory mandate requiring accessibility of telecom call centres from 8 AM to 12 AM, already provides extensive consumer support coverage across majority of the day and adequately caters to typical consumer complaint and service requirements. At the same time, VIL has proactively enabled agent assistance at the call center access from 6:00 AM onwards, as we have noticed that reasonable number of calls start coming from 6:00 AM onwards.
2. In today’s scenario, the customer is being provided support via human assisted customer care as well as through digital platforms such as chatbots, AI agents, mobile apps, websites, self-care portals etc. for quick and convenient complaint redressal. We have deployed one of the most advanced hybrid customer support ecosystems combining both automation and human assistance for customer’s ease such that, even if the human call centre agents are not available 24*7, the customers can still Register complaints, seek basic assistance, Track complaint status, Access self-care services and Receive automated responses.



3. The effectiveness of our advanced hybrid system gets established from the fact that out of total calls received during 1st week of May'26, only ~3.5% of customers opted for agent transfer. This signifies that the essential support is already being addressed through alternate digital channels, IVR, chatbots, and self-service mechanisms, even before the human assistance is available. It may also be noted that critical/emergency services — such as SIM blocking for lost phones, can be availed by customers instantly via the Vi Mobile App, the official website, or the automated IVR system.
4. Given the efficacy of such advanced systems, imposing mandatory round-the-clock live human agent support would result in significant operational and cost implications, without delivering commensurate consumer benefit. Operating a call center in night shift demands a highly disproportionate allocation of resources, including dedicated agents, secure transportation, round-the-clock IT support, overhead utilities, and security personnel. Scaling up this physical infrastructure to manage a modest average of 3% of calls is financially unviable and not a pragmatic approach. Instead, if required, it can be met by deploying Agentic AI based assistance, which will serve as a more efficient and cost-effective approach.
5. **Hence, we propose to continue the existing customer care accessibility window from 08:00 AM to 12:00 AM. In case the Authority still decides to amend this, then the round the clock availability should be kept as a hybrid customer support ecosystem, allowing both automation and agent (AI or human) assistance at the choice of TSP.**

F. REGULATION -3 (9), (10), (11)

“(9) Every service provider shall ensure that an Interactive Voice Response System or IVRS, if installed on a “Consumer Care Number”, is operated in the following manner:-

(a) the first level of the IVRS provides for language selection;

(b) the second level of the IVRS provides for options relating to appeal and the broad categories of complaints and service requests;-

(c) the third level of the IVRS provides for a sub-menu under complaints and service requests, separately;-

(b) the second level of the IVRS provides callers with options to select request type, specifically: for options relating to the broad categories of complaints and service requests;

(i) ‘Complaints’,

(ii) ‘Appeals’,

(iii) ‘Service Request/Query’;

(c) Subsequent to selection made at second level,

(i) the third level of the IVRS provides for a context-specific sub-menu under complaints, appeals and service requests or queries, separately;

(ii) the third level of any complaint, appeal or service requests or queries sub-menu shall also contain an option to connect with a human consumer care representative.



(iii) At the third level of IVRS, the consumer/customer should be given an option for callback facility or wait in the queue for connecting with human consumer care representative.

(10) Every service provider shall also ensure that a consumer is able to register complaints or appeals and raise requests/ queries through their web portal/ website as well as mobile application. This mechanism should have following provisions:

(a) The first level of mechanism shall provide following options to select from:

(i) 'Complaint',

(ii) 'Appeal',

(iii) 'Service Request or Query'

(b) Subsequent to selection made at previous level,

(i) The application will provide context-specific sub-menu under the complaints, appeals and service requests or queries, separately;

(ii) In case the consumer prefers to give additional information or in absence of suitable options, the app/portal shall further provide an option for the complainant to share the details of their issue by entering text or via voice note.

(c) The application shall also provide an option to connect with a human consumer care representative.

(d) Consumers should receive regular updates and information regarding the status, actions taken, and projected resolution timelines for their complaints through the application interface, until final resolution, specifically but not limited to the following.⁵³

(i) The initial update regarding the acknowledgement of service request/complaint with docket number is shared with the consumer,

(ii) Depending on the category of complaint, the relevant information regarding expected time for resolution and information about allotment of technician, if required, shall be shared with the consumer,

(iii) In case a complaint is likely to exceed the prescribed or designated benchmark under these Regulations, the Service Provider should acknowledge the delay and inform the complainant about reason for such delay along with the revised estimated timeline for resolution.

(iv) Once the complaint is closed, a confirmation message with survey link is shared with consumer.

(11) Service Provider may at its option also enable a consumer to register complaints or appeals and raise requests/ queries through any of their new-age customer-centric solutions (Chatbots, AI Agents, etc.), either already developed or the ones that may be deployed in future, which may be available on its web portal/website or mobile application. These solutions shall follow the same provisions as mentioned above in sub regulation (10)."

VIL comments:

1. Considering the rapid evolution of customer interaction technologies, it is submitted that the provision under Regulation 9 (c)(iii) and 10(c), should be made **technology-neutral** by allowing both **human representatives as well as AI-powered (Agentic AI) customer support agents, to provide support to the consumers.**



2. In respect of the proposed amendment, it is submitted that while the intent of providing the consumer with the option of connecting with a human consumer care representative is appreciated, the provision may require broadening to reflect the current technological evolution in customer engagement systems. The existing framework, if restricted only to human agents, may inadvertently limit the ability of service providers to deploy advanced, efficient, and consumer-friendly solutions such as Agentic AI-based customer support systems, which are increasingly becoming integral to modern digital service delivery ecosystems.

3. Advantages of Agentic AI based Customer interactive support systems:

- a. From a service provider's perspective, the deployment of Agentic AI offers significant advantages over conventional human-assisted interaction models. Unlike human agents, AI-driven systems are capable of handling a very high volume of concurrent interactions without any degradation in response time, thereby substantially reducing or even eliminating queue waiting times, particularly during peak traffic conditions or network outages when complaint volumes typically surge.
- b. Further, such systems operate on a continuous basis and provide uninterrupted services on a 24x7 basis without any dependency on shift-based operations, ensuring consistent availability and service continuity for consumers at all times. In addition, AI-based agents operate on structured knowledge bases and pre-defined workflows, which enables them to deliver consistent and accurate responses across interactions, minimizing variability and risks of human error in complaint registration, categorization, or guidance provided to the consumer.
- c. Another important advantage is the ability of Agentic AI systems to enable faster resolution of standard and routine consumer issues. These systems can be seamlessly integrated with backend systems of the service provider, allowing real-time access to subscriber information, service status, billing data, and network parameters. This facilitates immediate diagnosis of issues and initiation of appropriate automated workflows, thereby significantly reducing the average handling time and improving overall resolution efficiency.
- d. Moreover, with advancements in natural language processing and contextual learning, AI agents are increasingly capable of providing personalized and context-aware interactions, including multilingual support, which is particularly relevant in the Indian telecom environment where consumers interact in diverse languages.

4. Agentic AI to be complemented by Human representative:

- a. At the same time, it is recognized that AI-based systems may not be able to adequately address certain category of consumer grievances, particularly complex, exceptional, or non-standard issues that may require human judgement and intervention. Therefore, it is essential to ensure that the adoption of Agentic AI is complemented with an appropriate human escalation mechanism.
- b. In this regard, it is submitted that the regulatory provision should explicitly require that where the AI-based agent is unable to satisfactorily resolve the consumer's issue within a reasonable



timeframe, or where the consumer expresses dissatisfaction with the interaction, the system should provide an option to connect to a human consumer care representative. Providing a defined threshold, such as automatic escalation to a human agent if the issue remains unresolved or the consumer remains dissatisfied within a period of approximately 60 seconds, would ensure that consumer interests are safeguarded while still enabling the benefits of automation and efficiency.

5. While the draft Regulation at Regulation 3(11) allows deployment of new-age customer centric solutions like chatbots, AI agents etc. However, we recommend that deployment of AI agents should also be allowed within Regulation 3(9)(c)(iii) and 3(10)(c) also, with option of reaching out to a Human care representative after 60 seconds.
6. In view of the above, it is proposed that the regulation may be suitably modified to adopt a technology-neutral formulation, allowing service providers the flexibility to offer connectivity to either a human consumer care representative or an AI-based agent at the appropriate level defined under the Regulation for IVRS/website/mobile-app, while simultaneously mandating an assured and time-bound fallback to a human representative. Such an approach would be aligned with the broader intent of the draft amendments, which already recognize the role of emerging customer-centric solutions such as chatbots and AI agents, and would promote innovation, scalability, and efficiency in grievance redressal without compromising consumer protection or service quality.
7. We recommend the draft amendment at Regulation 9(3)(c)(iii) to be replaced with following revised provision and similar amendments to be made to Regulation 10(3)(c):

“At the third level of IVRS, the consumer shall be given an option to wait in the queue for connecting with a consumer care representative (human or AI-based agent). In cases where the AI-based agent is unable to resolve the issue or the consumer is not satisfied within a reasonable duration (e.g., 60 seconds), the system shall offer an option to connect with a human consumer care representative.”

G. REGULATION-3(12)

“(12) Making ICT Accessible for Person with Disability (PwD)

- (a) Service Providers should have a special desk(s) in their Call Centres/Consumer support centres which should be manned by person(s) competent to receive calls from PwDs using assistive technologies.*
- (b) The calls from PwD category subscribers shall be routed to such dedicated desk/ helpline and necessary step-by-step assistance may be provided to them.*
- (c) Mobile app/website/portal should have accessibility features as per Government of India guidelines on PwD.”*



VIL comments:

1. **At the outset, we state that for VI all PWD customers are treated with full respect, at first priority, at store and at call center.** In call centre, we already have a dedicated flow for PwD customers, where they can directly connect to agent without any waiting time. The PwD customers are flagged in the system and once they call the IVRS, they are directly connected to the customer care agent.
2. The TSPs are already in compliance with the accessibility guidelines for PwD issued by the DoT vide their letter dated 31.07.2025. Introducing a mandate under the current regulation is duplication of regulatory and compliance mandates, forcing TSPs to be obligated for same requirements under different set of compliance frameworks and competent authorities, without any incremental benefit to PwD consumers.
3. **We recommend this provision should be dropped as it is already covered under existing DoT guidelines. In case the Authority doesn't agree with our above submissions, we request the Authority should clearly provide details of assistive technology as well as how it would benefit PwD customers, under the consultative process.**

H. REGULATION-5 (a)

*“(5). Publication of Information----(1) Every service provider shall, within forty-five days from the date of commencement of these regulations, publicise the “Consumer Care Number” and the “General Information Number”, through, ----
(a) public notice in a leading newspaper in Hindi or English each in Hindi and English and in a leading newspaper published in a local language of the service area official language / languages of the state(s) in the licensed service area;”*

VIL comments:

1. With respect to the proposed amendment under Regulation 5(1)(a) relating to publication of consumer care information in newspapers, it is respectfully submitted that the continued reliance on print media as a mandatory mode of communication may no longer be appropriate or proportionate in the present digital ecosystem.
2. Over the past decade, there has been a significant shift in consumer behavior, with the overwhelming majority of telecom subscribers accessing services, information, and support through digital channels such as mobile applications, websites, email, and SMS.
3. In this context, mandating publication in newspapers, which have limited reach, are transient in nature, and are increasingly being replaced by digital sources of information, may not effectively serve the intended objective of consumer awareness. Further, such a requirement imposes recurring operational and financial burdens on service providers without commensurate benefits in terms of consumer outreach or engagement.



4. It is also pertinent to note that the draft regulation itself places considerable emphasis on digital platforms for grievance redressal, including mandatory provisions for mobile applications, web portals, SMS and email-based communication. In light of this broader regulatory direction towards digital-first engagement, it would be more appropriate to prioritize dissemination of consumer information through these widely accessed and real-time channels, which allow for continuous visibility, easy accessibility, and timely updates.
5. Digital channels also provide the additional advantage of enabling interactive access to information, including direct navigation to complaint registration systems, tracking tools, and escalation mechanisms, thereby enhancing overall consumer convenience and transparency.
6. In view of the above, it is submitted that the requirement for mandatory publication in newspapers may kindly be dispensed with. Instead, service providers may be required to ensure prominent and continuous display of such information on their official websites, mobile applications, SMS/email communications, and other digital interfaces, which are more aligned with current consumer usage patterns and regulatory objectives.
7. However, in the event the Authority is of the view that newspaper publication should be retained, it is further submitted that the requirement to publish such information mandatorily in both Hindi and English newspapers may be reconsidered. Given the diversity of licensed service areas and the varying linguistic preferences of consumers across regions, service providers may be permitted flexibility to publish in a language or combination of languages that is most relevant and effective for the concerned service area. Mandating publication in both Hindi and English, in addition to the official language(s) of the state(s), may lead to duplication, increased costs, and operational complexity, without necessarily enhancing consumer awareness proportionately. A more balanced approach would be to require publication in either Hindi or English, along with the relevant official language(s) of the service area, or to allow the service provider to determine the most appropriate language mix based on the demographic profile of its subscriber base in the respective licensed service area.
8. **Accordingly, it is requested that Regulation 5(1)(a) may be suitably modified to reflect a digital-first approach to consumer communication, while providing service providers reasonable flexibility in respect of language requirements, so as to ensure both effectiveness and proportionality in compliance.**

I. REGULATION-10 (2) and (5)

“(2) The Appellate Authority shall consist of one or more persons as may be decided by the service provider. who should be a regular employee in the senior management of the service provider with at least 5 years of experience.

(5) Every Service Provider shall place before its Chief Executive Officer (CEO) or the Board of Directors, as the case may be, a quarterly report on the redressal of



complaints, appeals and results of online consumer survey, for review and appropriate oversight.

Provided that such report shall, inter alia, include the number of complaints/appeals received, disposed of, pending, the time taken for disposal, and results of online consumer survey, in such format as may be specified by the Authority from time to time.”

VIL comments:

1. At the outset, it is submitted that our company already has in place duly designated senior officials who discharge the functions of the Appellate Authority in an effective, accountable, and time-bound manner. These officials possess the requisite experience, domain knowledge, and decision-making authority to address consumer appeals efficiently, and the existing framework has been designed keeping in view both regulatory expectations and the need to deliver high levels of consumer satisfaction.
2. In this regard, it is important to highlight that in a highly competitive telecom sector, customer complaint resolution and consumer satisfaction constitute critical performance indicators and are closely monitored within the organization at multiple levels, including the highest levels of management. Telecom service providers operate in an intensely competitive market where consumer experience directly impacts customer retention, brand reputation, and revenue outcomes. As a result, grievance redressal performance, complaint volumes, resolution timelines, and customer satisfaction metrics are routinely tracked through internal dashboards, management reviews, and performance scorecards. These parameters are often subject to periodic review not only at operational levels but also at senior management and executive leadership levels as part of business performance monitoring. Consequently, service providers are already incentivized, both commercially and reputationally, to ensure robust, responsive, and continuously improving grievance redressal mechanisms without the need for prescriptive regulatory direction on internal governance structures.
3. Against this backdrop, the proposed amendments under Regulation 10(2), which prescribe that the Appellate Authority should necessarily be a regular employee in senior management with a minimum 5 years of experience, and Regulation 10(5), which mandate placement of detailed grievance redressal reports before the Chief Executive Officer or Board of Directors, appear to be overly prescriptive in nature.
4. While the objective of ensuring accountability and effectiveness in the appellate process is fully appreciated, such detailed prescriptions on organizational hierarchy, employee designation, and internal reporting mechanisms may amount to regulatory micro-management of internal affairs of service providers. It is generally recognized that sectoral regulation should focus on defining outcomes and performance standards, such as service quality benchmarks, timelines, transparency, and accountability, rather than prescribing the internal structuring of organizations.
5. While TSPs/ISPs may differ significantly in their size, organizational design, governance models, and operational processes however, mandating uniform criteria relating to designation, tenure, or reporting structures may restrict the flexibility of companies to design governance frameworks



that are best suited to their operational needs and business models. It may also lead to inefficiencies by imposing rigid structures that do not necessarily improve consumer outcomes but increase compliance burden. Likewise, mandating the placement of specific operational reports before the CEO or Board of Directors may overlap with existing corporate governance frameworks under applicable company law and securities regulations, which already provide adequate flexibility and responsibility to Boards to determine the scope and nature of management reporting.

6. From a broader regulatory standpoint, excessive prescriptiveness may have unintended consequences, including reduced organizational agility, constraints on innovation in customer experience models, and diversion of resources toward compliance formalities rather than actual service improvement. In a sector that is rapidly evolving with the adoption of digital platforms, automation, and AI-driven customer support systems, it is particularly important that regulations remain principle-based and technology-neutral, enabling service providers to continuously innovate their grievance redressal processes.
7. In view of the above, it is respectfully submitted that while the objective of strengthening accountability in grievance redressal is well taken, the regulations may be reframed to adopt a more outcomes-driven and principle-based approach.
 - a. Instead of prescribing the specific level, designation, or experience of the Appellate Authority, the regulation may require that the authority be suitably qualified, empowered, and accountable for timely and effective disposal of appeals.
 - b. Similarly, in place of mandating reporting to the CEO or Board, service providers may be required to ensure appropriate internal oversight and governance mechanisms, subject to regulatory monitoring through reporting, audits, and performance metrics already envisaged under the draft regulations. Such an approach would strike a better balance between regulatory objectives and organizational autonomy, while remaining aligned with established public policy principles of proportionality, flexibility, and non-intrusive regulation.

J. REGULATION-15(1) & (2)

~~“(1) The Secretariat shall keep record of the appeals preferred, reply of the service provider, the advice of the Advisory Committee and the decisions of the Appellate Authority. The Appellate Authority shall keep record of the preferred appeals, relevant details and documents collected from the concerned division/ department of the service provider, the decisions and the action taken for resolution of the dispute by the Appellate Authority, for at least one year after disposal of the appeal.”~~

~~Every service provider shall submit to the Authority and also place on its website, by the 15th of the month succeeding every quarter, a report mentioning therein—~~

~~(a) number of appeals received~~

~~(b) Number of appeals disposed off~~



- ~~(c) Number of appeals pending and~~
- ~~(d) Such other particulars, as may be required by the Authority.~~

Every service provider shall submit to the Authority as well as publish the same on their website/portal/app, on quarterly basis, a comprehensive performance report separately for complaints and appeals for each LSA separately, within 15 days from the end of each quarter; The report shall include, but not to be limited to, the following:

- (b) Key Performance Indicators (KPIs) for Complaints:
 - i. Number of Complaints pending and brought forward from last quarter,
 - ii. Number of Complaints received during the quarter,
 - iii. Number of Complaints disposed of during the quarter,
 - iv. Number of Complaints pending at the end of the quarter
 - v. Complaints Redressed Within the time limit,
 - vi. Complaints Redressed beyond the limit,
 - vii. Average Resolution time,
 - viii. Percentages of the complaint resolved to the full satisfaction of the consumer
 - ix. Percentage of total complaints resolved
 - x. Survey results for Appeals to be shared for following indicators:
 - 1.Total count of consumers participated in survey,
 - 2.Total Count of Customers, who gave a rating of 1,
 - 3.Total Count of Customers, who gave a rating of 2,
 - 4.Total Count of Customers, who gave a rating of 3,
 - 5.Total Count of Customers, who gave a rating of 4,
 - 6.Total Count of Customers, who gave a rating of 5;

- (b) Key Performance Indicators (KPIs) for Appeals:
 - i. Number of Appeals pending and brought forward from last quarter,
 - ii. Number of Appeals received during the quarter,
 - iii. Number of Appeals disposed of during the quarter,
 - iv. Number of Appeals pending at the end of the quarter
 - v. Appeals Redressed Within the time limit,
 - vi. Appeals Redressed beyond the limit,
 - vii. Average Resolution time,
 - viii. Percentages of the complaint resolved to the full satisfaction of the consumer
 - ix. Percentage of total complaints resolved
 - x. Survey results for Appeals to be shared for following indicators:
 - 1.Total count of consumers participated in survey,
 - 2.Total Count of Customers, who gave a rating of 1,
 - 3.Total Count of Customers, who gave a rating of 2,
 - 4.Total Count of Customers, who gave a rating of 3,
 - 5.Total Count of Customers, who gave a rating of 4,



6.Total Count of Customers, who gave a rating of 5;

- (c) Every Service Provider shall submit to the Authority, on a half-yearly basis, compliance report certifying that the provisions relating to publicity of the Customer Care Number, General Information Number (GIN), and other information as specified under sub-regulation (2) of regulation 5, have been duly complied with. Provided that such report shall be furnished within fifteen (15) days from the end of each half-year, in such format and manner as may be specified by the Authority from time to time, along with documentary evidence of such publicity.*
- (d) The Authority may from time to time amend or change the reporting requirements, as necessary.*
- (e) Every service provider shall create or upgrade their system within six months of notification of these regulations for collection of primary data, its storage, processing, performance report generation and their online submission to the Authority, in respect of each parameters specified under regulation 15 (2) in such manner and format, at such intervals and within such time limit as may be specified by the Authority, from time to time, by an order or direction.”*

VIL Comments:

1. The Proposed amendment mandating maintenance of records relating to appeals for a minimum period of one year may lead to avoidable operational and compliance burden on TSPs without corresponding regulatory or consumer benefit.
2. TSPs already maintain extensive grievance redressal systems, complaint tracking mechanisms and audit processes through automated digital platforms wherein most consumer grievances and appeals are resolved within substantially shorter timelines.
3. Further, maintaining records relating to appeals for the immediately preceding three months should sufficiently meet operational analytical and consumer grievance redressal requirements.
4. **We strongly recommend that the record keeping should be kept for 3 months only.**

K. REGULATION - 18

- “a. Under sub-regulation (1), the words "at least one year after disposal of the complaint/appeal as the case may be." shall be inserted at the end;*
- b.Under sub-regulation (2), the following words "in exercise of power conferred by section 12, of the Telecom Regulatory Authority of India Act, 1997 (24 of 1997)" to be inserted after words "provisions of these regulations.”*

VIL Comments:



1. The proposed mandate for maintaining records of redressal of complaints and the appellate authority for audit and inspection may result in significant operational and compliance burden on service providers without corresponding consumer benefit.
2. TSPs already maintain robust digital systems and internal controls to ensure traceability, transparency and regulatory oversight of complain handling processes. Such systems adequately support audit, inspection and compliance verification requirements under the existing framework.
3. Accordingly, while records necessary for audit and inspection may continue to be appropriately maintained by TSPs in accordance with internal governance and applicable regulatory requirements, **the mandatory retention period for detailed complaint and appellate records may suitably be limited to six months, which is operationally adequate and proportionate.**

L. REGULATION-18 (A)(4)

“(4) If during such audit, inspection, analysis or review, the Authority finds that a complaint / appeal was dismissed improperly or disposed of unsatisfactorily, the service provider shall be liable for financial disincentive of

- a. Rupees One thousand only (Rs. 1000/-) per improper dismissal/disposal of complaint by service provider, and /or*
- b. Rupees Five thousand only (Rs. 5000/-) per improper dismissal/disposal of appeal by service provider,*

Provided that the maximum amount of financial disincentive payable by a service provider shall not exceed rupees fifty lakhs per quarter for the licensed/authorized service area.

Provided further that no order for payment of any amount by way of financial disincentive shall be made by the Authority unless the service provider has been given a reasonable opportunity of representation against the contravention of the regulation observed by the authority;”

VII Comments:

Financial Disincentive in case of complaint/appeal disposed of unsatisfactorily

1. With respect to the proposed provisions under Regulation 18A(4) relating to imposition of financial disincentives in cases where a complaint or appeal is “disposed of unsatisfactorily”, it is respectfully submitted that while the intent of strengthening accountability in grievance redressal is appreciated, the formulation of the provision—particularly the reference to “unsatisfactory disposal”—is inherently subjective and may give rise to ambiguity, inconsistent interpretation, and potential regulatory uncertainty.



2. The concept of “unsatisfactory disposal” is not clearly defined in the draft regulation and is likely to vary significantly depending on individual consumer expectations, the nature of the grievance, and the specific circumstances of each case.
3. In the telecom sector, grievance redressal often involves issues where outcomes are governed by contractual terms, regulatory provisions, technical feasibility, or factual determinations. In many such cases, even where the service provider has acted fully in compliance with applicable regulations, license conditions, and contractual obligations, the consumer may still remain dissatisfied with the outcome. Therefore, equating consumer dissatisfaction with deficiency in complaint handling or treating it as a basis for financial disincentive may not be appropriate, as it does not necessarily reflect any lapse or non-compliance on the part of the service provider.
4. It is also important to recognize that it may not be feasible in all cases for a service provider to achieve an outcome that is satisfactory to the consumer, particularly in disputes relating to billing, tariff applicability, service limitations, or regulatory restrictions. The grievance redressal framework is intended to ensure fair, transparent, and timely resolution of complaints in accordance with established rules and procedures; however, it cannot guarantee universal satisfaction in every individual case. Introducing financial disincentives based on a subjective outcome parameter such as satisfaction may lead to unintended consequences, including increased disputes, defensive decision-making, and reluctance to take objective or rule-based positions where such positions may not align with consumer expectations.
5. From a regulatory policy perspective, the proposed formulation may also be viewed as an instance of overreach, as it extends beyond ensuring compliance with defined standards into assessing qualitative aspects of outcomes that are inherently subjective and difficult to measure consistently. Effective regulation typically relies on objective, measurable, and clearly defined parameters—such as adherence to timelines, procedural compliance, accuracy of information provided, and conformity with applicable regulations—rather than subjective perceptions of satisfaction. In the absence of well-defined and standardized criteria, the imposition of financial disincentives on the basis of “unsatisfactory disposal” may expose service providers to uncertainty and potential arbitrariness in enforcement.
6. In view of the above, it is submitted that the provision relating to financial disincentives may be suitably refined to focus on clearly defined, objective, and verifiable instances of non-compliance, such as failure to adhere to prescribed timelines, violation of regulatory provisions, improper rejection without due process, or non-communication of decisions. Alternatively, if the Authority intends to incorporate consumer feedback as part of regulatory oversight, the same may be used as an input for monitoring trends, identifying systemic issues, and guiding supervisory interventions, rather than as a direct trigger for penal action.
7. Accordingly, it is requested that the reference to “unsatisfactory disposal” may be reconsidered and either removed or replaced with objective and clearly defined criteria to ensure that the regulatory framework remains fair, proportionate, and aligned with ground realities of telecom service delivery, while still achieving the intended goal of improving grievance redressal standards.



Amount of Financial Disincentive

8. In addition, it is respectfully submitted that the level of financial disincentive proposed under Regulation 18A(4) appears to be disproportionately high, particularly when viewed in conjunction with the subjective nature of the triggering criteria. The provision envisages imposition of monetary penalties on a per-case basis, which, when aggregated across the large volume of complaints handled by telecom service providers, could result in a substantial and recurring financial burden. Given the scale at which telecom operators function—servicing millions of subscribers and handling very high volumes of complaints on a daily basis—even a small proportion of cases falling within the scope of such provisions could translate into significant financial exposure.
9. Such a framework may have unintended consequences, including diversion of resources away from actual service improvement initiatives toward compliance management and dispute mitigation. It may also encourage overly risk-averse or defensive approaches in complaint handling, where decisions are influenced by the potential for penal action rather than by objective and rule-based considerations. This could ultimately be counterproductive to the objective of fair and transparent grievance redressal.
10. From a public policy perspective, financial disincentives should ideally be calibrated in a manner that is proportionate to the nature and gravity of non-compliance, and should be tied to clearly defined, objective, and verifiable parameters. Imposition of relatively high penalties in complaints of low/medium gravity, leads to regulatory uncertainty and disproportionate compliance burden on service providers. It is also important to consider that telecom tariff structures in India are highly competitive and among the lowest globally, which limits the ability of service providers to absorb additional financial burdens of this nature without impacting investment capacity, service expansion, or quality improvements.
- 11. In view of the above, we submit that**
 - a. The quantum of financial disincentive may be reviewed and rationalized, ensuring that it remains proportionate, balanced, and aligned with objective criteria of non-compliance.**
 - b. Further, a graded or threshold-based approach, linked to demonstrable and systemic deficiencies rather than individual case-level subjective assessments, may be more appropriate and would better serve the dual objectives of ensuring accountability while maintaining regulatory fairness and sustainability of the sector.**

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