

Mathur, Subodh

From: Vivek Khare <adv.ca@traf.gov.in>
Sent: 19 June 2026 23:38
To: Shailesh Rajpoot
Cc: Mathur, Subodh
Subject: [EXT] Fwd: VOICE Counter-Comments on TRAI consultation on "Draft Telecom Consumer Complaint redressal (Fourth Amendment) Regulation, 2026"

Advisor (CA)
Telecom Regulatory Authority of India
New Delhi
Phone - 011-20907772

===== Forwarded message =====

From: H Upadhyay <hupadhyay@consumer-voice.org>
To: "Vivek Khare" <adv.ca@traf.gov.in>
Cc: "COO" <coo@consumer-voice.org>, "Avijit Bose" <avijit.bose@consumer-voice.org>
Date: Fri, 19 Jun 2026 13:22:59 +0530
Subject: VOICE Counter-Comments on TRAI consultation on "Draft Telecom Consumer Complaint redressal (Fourth Amendment) Regulation, 2026"

===== Forwarded message =====

To,
Shri Vivek Khare, Advisor (CA),
Telecom Regulatory Authority of India,
4th, 5th, 6th & 7th Floor, Tower-F,
World Trade Centre, Nauroji Nagar,
New Delhi: 110029
e-mail:- adv.ca@traf.gov.in

Dear Sir,

Subject: VOICE Counter-Comments on TRAI consultation on "Draft Telecom Consumer Complaint redressal (Fourth Amendment) Regulation, 2026"

We at VOICE as part of our advocacy initiative in Telecommunications continuously raise different issues with Policy makers impacting consumers based on the knowledge through Consumer feedbacks. As registered CAG with TRAI we are in forefront of providing inputs to TRAI related to consumer concerns and interests.

In continuation of this effort on behalf of telecom consumers, we at VOICE have following Counter Comments:

Since 2021, substantial concessions and reliefs have been provided to TSPs like **Four-Year Moratorium** for spectrum purchases and AGR dues; modification in **AGR Redefinition; No Bank Guarantees (BGs) and Interest Rates Rationalization**. All these concessions and reliefs are paid for from public funds without any public benefits. It is quite obvious that these and many other concessions and reliefs have not any benefits to consumers specially in **improving QUALITY OF SERVICE and COMPLAINT REDRESSAL by the TSPs**.

DRAFT AMENDMENTS:

Point 1.2 They shall come into force from the date of their publication in the Official Gazette.

VOICE Counter-Comment: Since these reforms are long overdue, any further deferment will be detrimental to consumers and they will continue to suffer due to lack of redressal and deteriorating telecom services.

Point 2.2(b) Access Service...

VOICE Counter-Comment: Definition as proposed is inclusive and should be retained.

Point 2.2(e) "Authorization" ..

VOICE Counter-Comment: Definition as proposed is inclusive and should be retained.

Point 2.2(f) Broadband..

VOICE Counter-Comment: "Terrestrial or Satellite" may be included in the definition for further clarity.

Point 2.2(p)(iv) "Service Query" ..

VOICE Counter-Comment: If it means 3rd party apps being used by the consumer, then "services availed by the consumer" may also be included.

Point 2.2(qa) "Survey" ..

VOICE Counter-Comment: It is an important parameter to gauge consumer satisfaction which will goad TSPs for complete resolution, hence must be retained.

Point 2.2(qa) official language/ languages..

VOICE Counter-Comment: Unlike other services, Telecom services are all-pervasive and hence the proposed amendment without any changes is a must.

Point 3.2 accessible to the customers between round the clock...

VOICE Counter-Comment: Unlike other services, Telecom services are all-pervasive and hence the proposed amendment without any changes is a must.

International roaming related complaints are quite frequent and these need 24 hours support.

Cyber frauds are rampant which needs 24 hour support/help for victims.

Point 3.8 IVRS..

VOICE Counter-Comment: Amendments proposed are the need of the consumers.

Point 3.9 web portal ..

VOICE Counter-Comment: Amendments proposed are the need of the consumers.

Acknowledgement should also include recording of the conversation as the consumer has no record and subsequent investigation solely will depend upon the TSP version. With today's technology, it is not very difficult.

Point 3.11 web portal ..

VOICE Counter-Comment: Amendments proposed are really innovative and the need of the consumers

Point 5.1-4 & 5.6 Publication of Information...

VOICE Counter-Comment: Apart from the amendments proposed which are required, TSPs should also send this information thr' SMS to all subscribers at least once a month.

Point 7.2 retain in the system, the details of complaints ..

VOICE Counter-Comment: Amendments proposed is required, 6 months period is required.

Point 7.3(a)(i) Registration of complaints and intimation to complainant...

VOICE Counter-Comment: Acknowledgement should also include recording of the conversation as the consumer has no record of his complaint and subsequent investigation solely will depend upon the TSP version. With today's technology, it is not very difficult specially if e-mail is registered.

Point 9.2 Appeal to Appellate Authority...

VOICE Counter-Comment: Complaint through may be replaced by "IN-PERSON".

Point 9.3 Appeal period...

VOICE Counter-Comment: Amendments proposed is required, 3 months period is required.

Point 10.1 Appellate Authority - Establishment and Composition...

VOICE Counter-Comment: Appellate Authority is required in every license area.

Point 10.2 Appellate Authority - Establishment and Composition...

VOICE Counter-Comment: Appellate Authority should consist of 2 members, one of which should be a regular employee in the senior management of the service provider with at least 5 years of experience. 2nd member should be from CAG registered with TRAI for the said license area.

Point 10.3 Appellate Authority - Establishment and Composition...

VOICE Counter-Comment: Amendments proposed is needed.

Point 10.5 Appellate Authority - Establishment and Composition...

VOICE Counter-Comment: Amendments proposed is needed.

This report on the redressal of complaints, appeals and results of online consumer survey, should also be available in public domain for review and appropriate oversight by CAGs and others for research etc.

Point 14.1 Acknowledgement of appeals...

VOICE Counter-Comment: Amendments proposed are the need of the consumers.

Acknowledgement should also include recording of the conversation as the consumer has no record and subsequent investigation solely will depend upon the TSP version. With today's technology, it is not very difficult.

Point 14A Online Consumer Survey...

VOICE Counter-Comment: Amendments proposed is needed.

Point 15 Reporting requirements...

VOICE Counter-Comment: Amendments proposed is needed.

Point 18 Inspection and Auditing...

VOICE Counter-Comment: Amendments proposed is needed.

Point 18A Online Consumer Survey...

VOICE Counter-Comment: Amendments proposed is needed.

Point 18B Violation of Compliances ...

VOICE Counter-Comment: Amendments proposed is needed.

A mechanism is required for compensating consumers for their sufferings by TSPs.

OVERRIDING VOICE COMMENTS:

1. It is well established by now that CAGs are a critical link between Telecom consumers, TSPs and the regulator/policy makers. Mandating CAGs as a member of the Appellate committee recognised their locus-standi with TSPs.
2. For dissatisfied consumers, CAGs are their next port of call after inadequate or unfair resolution of their grievance by TSPs.
3. Since TRAI does not entertain individual consumer complaints, CAGs remain consumers' only hope for grievance redressal.
4. Regulator/policy makers should appreciate that CAGs are the only source of information about the Telecom landscape apart from the industry which is generally biased against consumers.
5. If CAG's role in the Appellate committee is removed, TSPs will not bother about them and will not care for the consumer issues raised by CAGs with TSPs.
6. It would have been better if the system was enhanced by having a quarterly review of CAG's work in Appellate committee and develop a feedback system for both the Regulator/policy makers and TSPs to further improve QoS.

Yours' Sincerely

19th June 2026

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Hemant Upadhyay
Advisor-Projects, IT & Telecom

Consumer Voice

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Consumer Voice is an independent non-profit organization dedicated to consumer education, product testing, research and advocacy.

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