

Email**Sushil Kumar**

[PLEASE OPEN THE ATTACHMENT WITH CAUTION]Fwd: Draft Registration of Consumer Organisations (Amendment) Regulations, 2023

From : S.M.K. Chandra <ja-cadiv@traf.gov.in> Tue, Oct 03, 2023 02:44 PM
Subject : [PLEASE OPEN THE ATTACHMENT WITH CAUTION]Fwd: Draft Registration of Consumer Organisations (Amendment) Regulations, 2023 📎 1 attachment
To : Sushil Kumar <to-cadiv2@traf.gov.in>
Cc : Man Mohan Vyas <deputy-advisor.ca@traf.gov.in>

From: "A.K Singh" <advisorit@traf.gov.in>
To: "S.M.K. Chandra" <ja-cadiv@traf.gov.in>
Sent: Tuesday, October 3, 2023 9:57:27 AM
Subject: Fwd: Draft Registration of Consumer Organisations (Amendment) Regulations, 2023

From: ccsbng@gmail.com
To: "A.K Singh" <advisorit@traf.gov.in>, "S.M.K. Chandra" <ja-cadiv@traf.gov.in>
Sent: Monday, October 2, 2023 10:13:53 PM
Subject: Draft Registration of Consumer Organisations (Amendment) Regulations, 2023

Sir,

Greetings

We pleased to attach the file with our comments on the Draft Registration of Consumer Organisations (Amendments) Regulations, 2023, for your perusal.

Kindly confirm receipt.

Thanking you,

Yours Sincerely

Gopal Ratnam
Secretary
M:8618226492

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Consumer Care Society
Mobile : 6364928222
Website: ccsbng.org



Registration of Consumer Orgns Regulations 2023 - CCS 2023.pdf

94 KB



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30th September, 2023

To,

Shri A.K. Singh
Advisor (CA & IT)
Telecom Regulatory Authority of India,

Sir,

Sub:- draft Registration of Consumer Organisations (Amendment) Regulations, 2023

We have reviewed the above draft and offer our comments/suggestions for your consideration.

At the outset, we understand that there is a benefit which is mentioned in the draft that of “It simplifies the registration process for such consumer organisations”. To reiterate, there is a single benefit for some consumer organisations. In fact, the benefit as we assess is administrative convenience, which happens once every 2 years for a few consumer organisations.

Against this, we believe that there are many drawbacks, including possible conflicts that will emerge as the result of these modifications, which we have elaborated in our comments section.

Hence, we request that this modification be dropped or deferred till there is an in-person consultative process with consumer organisations, as we do fully endorse the objective of raising awareness among consumers/citizens.

Thanking you,

Yours Sincerely

Gopal Ratnam V
Secretary
Consumer Care Society
M:8618226492

Comments on the draft Registration of Consumer Organisations (Amendment) Regulations, 2023

The draft lists a single benefit to a few consumer organisations. However, there are a larger number of drawbacks. Some of these could be cause for potential conflicts in the future. Hence, the draft should NOT be considered for further action.

Drawbacks:

1. The draft envisages 2 categories of consumer organisations - State level and National level. This could lead to possible confusion and conflict in various situations. We list just two. In CUTCEF there is a representative consumer organisation from each of the 5 zones. Will the National level consumer organisation be considered for a single zone or multiple zones? In both cases, there is a second order problem. Such a National level consumer organisation would have more than one representative in CUTCEF or would have more opportunities to be represented at CUTCEF. This leads to bias and is also inimical to the development of the consumer movement in general. Another example is recognition of Consumer Organisations for awards or rewards.

2. TRAI wishes to focus on “marginalised communities” and “rural areas” as mentioned in the draft. This could be achieved better by local level (grass root) organisations than National level organisations. In fact, TRAI should encourage more smaller and district-level consumer organisations if it wishes to achieve the objectives listed in the draft. As an example, the state of Uttar Pradesh has 75 districts. Even having a few State level Consumer Organisations in such a big state is highly ineffective in reaching in a meaningful way the target groups that TRAI wishes to focus on. Hence, adding a State Body of a National level Consumer Organisation, is a retrograde step and contrary to the very objectives that are listed by TRAI to bring this modification.

3. A State level Consumer Organisation has to have a minimum of 3 years of experience. This is also retained for a National level Consumer Organisation. Many questions arise. (a) One question is, Is the experience only for one State or each one of the States? If it is for only one state, then how can a National level consumer organisation that has not worked in a particular state be as effective as an organisation which has worked for 3 years in that state? Further, it is inherently discriminatory. A State level consumer organisation applying for registration should have 3 years experience of having worked in that state but a National level consumer organisation which has no experience of having worked in that State would circumvent that criteria. This can give rise to disputes. (b) Another question is the renewal of registration. If a National level Consumer Organisation has not effectively worked in a particular state, would its registration be cancelled at the State level or National level?

4. Management studies indicate that a larger organisation with subordinate bodies is invariably not agile nor effective locally due to its inherent structure and centralised decision making. So National level consumer organisations having State level offices will NOT be as effective in addressing the needs of the local groups as would Local (State or District) level consumer organisations.

5. Over the past few years, the trend is that most organisations, whether corporate or consumer, are addressing an audience that spread over different geographies, because of the availability of technology. This process has been accelerated due to the pandemic and will continue to grow in the future. Our experience is that we are handling grievances from across the country and are able to conduct programs virtually for some sections of the public throughout the nation, using technology. So this raises 2 important points which negate the need for a new category of National level consumer organisations. One, most consumer organisations are National in their reach or can be National in reach through the use of technology. We consider ourselves to be one. Another point, is that this move of TRAI is against the trend of the world becoming increasingly connected. In fact, with 5G, studies indicate that in-person meetings/programs will further reduce. However, for the people on the other side of the digital divide (not digitally connected), it is the Local consumer organisations that can reach them effectively. Moreover, going forward, with the emphasis of the Government of India on encouraging more citizens to become digital literate and connected, this group will become smaller in the future and, hopefully, disappear.

6. Lastly, having been a CAG for a long period, we think the benefit that is being touted is meagre in nature. We have done the registration process many times. While it does require some effort, it is not too cumbersome. In fact, to ease the load on the consumer organisations, we would like the registration period to be more than 2 years, especially for organisations which have been associated with TRAI for a longer period. So the benefit that is listed in the draft that may accrue to a few consumer organisations is paltry.

Gopal Ratnam V
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