

Bharti Airtel Ltd.

India & South Asia
Airtel Center, Plot No. 16,
Udyog Vihar, Phase - IV,
Gurugram - 122 015
Haryana, India

www.airtel.in
Call +91 124 4222222
Fax +91 124 4243252



TRAI/FY26-27/13
5th May 2026

Shri. Vijay Kumar
Advisor (Financial & Economic Analysis)
Telecom Regulatory Authority of India,
World Trade Centre
Nauroji Nagar
New Delhi – 110029

Subject: Bharti Airtel's Comments on Consultation Paper on the *Telecom Consumer Protection (Thirteenth Amendment) Regulations*

Reference: TRAI's Consultation Paper dated 7th April 2026

Dear Sir,

This is in reference to TRAI's Consultation Paper on the *Telecom Consumer Protection (Thirteenth Amendment) Regulations dated 7th April 2026*.

In this regard, please find enclosed our comments to the consultation paper for your kind consideration.

Thanking You,

Yours Sincerely,
For **Bharti Airtel Limited**

A handwritten signature in blue ink, appearing to read 'Rahul Vatts'.

Rahul Vatts
Chief Regulatory Officer

Encl: a.a

This is in reference to the Draft 13th Amendment to the Telecom Consumers Protection Regulations, 2012 ("TCPR 2012"). At the outset, Airtel thanks the Authority for providing us with the opportunity to comment on the Draft 13th Amendment to TCPR 2012.

Airtel's Submission

1. Airtel strongly submits that the proposed mandates requiring the following should be withdrawn:
 - a. the provisioning of Voice+SMS-only packs corresponding to every validity of existing bundled offers, and
 - b. the application of "largely proportional" tariff reductions for such packs.
2. These proposals amount to structural tariff engineering through regulation and represent a material departure from India's proven forbearance-based regime.
3. Tariff forbearance and pricing flexibility should remain the cornerstone of telecom tariff regulation in India, as they have been for the past two decades. Within this framework, the Authority's focus should not be on micro-designing tariff components or prescribing internal price relationships within bundled plans. Such an approach will protect consumer interests, sustain competitive intensity and enable the continued investment necessary for India's 5G, convergence and future 6G journey.

In the above context, please find below our detailed justification:

I. TELECOM AS THE FOUNDATIONAL DIGITAL INFRASTRUCTURE OF INDIA'S ECONOMY, GOVERNANCE AND INCLUSION

1. Telecom networks in India have moved from being a basic "utility" for voice calls to the **primary rails of the country's digital public infrastructure and growth model**. Mobile networks now carry most digital payments, welfare transfers, education content, tele-medicine, e-governance and digital commerce, making them a **foundational layer of the modern Indian state and economy**. Any policy that materially affects how Indian consumers access **mobile data** will therefore directly influence how they transact, receive subsidies, learn, access health services and participate in markets.
2. Over the past decade, India has recorded one of the **fastest expansions of mobile broadband in the world**, with over 800 million internet users and the overwhelming majority going online primarily through mobile devices. **Average monthly data consumption per user has risen from under 1 GB to well over 25 GB** over almost a decade, reflecting how deeply embedded mobile data has become in everyday life. This shift is not accidental; it is the result of **policy choices that emphasized affordability, competition and bundled access**, thereby normalizing data usage across income segments.
3. India's **Digital Public Infrastructure (DPI) stack—Aadhaar, UPI, DigiLocker, e-KYC, Account Aggregators and allied platforms—is explicitly mobile-first**. It assumes **ubiquitous, affordable, always-on mobile broadband as the default last-mile access channel** for hundreds of millions of

citizens. Everyday DPI actions—authenticating with an Aadhaar OTP, receiving a DBT credit alert, paying via UPI at a kirana, downloading an admit card from DigiLocker, or booking a tele-consultation—depend on a data session or at least on a network that keeps app connectivity and SMS working reliably. **Data is no longer a luxury; it is the default “pipe” through which India’s public and private digital ecosystems reach the common citizen.**

4. This mobile-first design is not a convenience, but a **necessity in a country where fixed broadband penetration remains limited. Over 95% of rural internet users rely exclusively on mobile networks**, so any degradation in mobile data access translates directly into reduced access to state services and economic opportunity. Telecom networks have thus become **co-equal pillars of governance infrastructure**, comparable in importance to roads or electricity.
5. The dependence of key use-cases on basic data connectivity is clear:
 - **UPI is now the world’s largest real-time payment system by volume**, handling tens of billions of transactions every month. Recent data suggests that UPI volumes touched 21.6 bn. Transactions in December’2025 with value standing at INR 28 lakh crores. A significant share occurs in **low-value, high-frequency** contexts—daily purchases, transport fares and peer-to-peer transfers—where the **availability of instant mobile data determines whether digital payments can substitute cash**.
 - **Aadhaar-based DBT schemes** for LPG, MNREGA, pensions and PM-KISAN rely on SMS alerts, app notifications and simple mobile web interfaces for beneficiaries to confirm credits and coordinate with banking correspondents. Without data, beneficiaries may hold accounts yet remain unaware of entitlements and balances, which welfare studies identify as a **major source of leakage and inefficiency**.
 - **DigiLocker and digital credentials** allow students, job-seekers and citizens to store and share marksheets, licenses and RCs; accessing these for KYC or recruitment requires small but reliable data sessions, and directly affects **employability, especially for gig workers, migrants and first-time job-seekers**.
 - **Tele-medicine and digital health platforms such as CoWIN and e-Sanjeevani depend on stable data connectivity** for remote consultations and record access, particularly where doctor-to-population ratios are constrained.
6. In all these scenarios, DPI remains inclusive only if **every citizen’s telecom pack includes at least some data**, even for users who consider themselves “voice-centric.” If regulatory interventions make it economically attractive to shift to **pure Voice+SMS-only packs with zero data** in exchange for modest savings, many price-sensitive users will rationally down-trade—**opting out of data, and therefore out of DPI**. Such a step **can drive such downgrades among low-income users**, creating a structurally “data-excluded” segment and **re-introducing a digital divide that India has spent years closing**.
7. From a consumer-protection perspective, the key risk is not that data is bundled “in excess”, but that regulatory design will make it commercially rational for vulnerable users to self-select into data-less products. Once a large enough cohort has been nudged into such Voice+SMS-only packs, the resulting “data-excluded” segment will be structurally hard to re-digitize, even if future policy wishes to correct course, because usage habits, handset choices and ecosystem offerings will all have adjusted to a low-data equilibrium.

8. In fact, the Government's own FASTag policy is a clear illustration of the principle that public policy can legitimately nudge consumers toward digital behavior. Under that framework, users are subjected to a penalty if they choose to pay toll charges in cash instead of using FASTag, despite the fact that many citizens may prefer cash over digital payments. This is a considered policy choice designed to advance efficiency and digital adoption. On one hand, the Government is trying to bring more people under digital economy and on the other hand, TRAI is trying to promote zero data tariff plans.
9. **TRAI's proposals—mandating Voice+SMS-only STVs at every validity and linking their pricing proportionally to bundled packs—must therefore be viewed not as narrow tariff tweaks, but as choices that will shape the trajectory of India's digital state and digital economy.** India's success has come from **treating data as a default component of connectivity.** A framework that **formalizes and privileges data-less connectivity risks reversing that success for the most low-income users.**
10. **Therefore, a forward-looking policy approach should instead recognize mobile data as a quasi-essential service and ensure that even the lowest-priced plans include a minimum assured data entitlement. This preserves affordability, sustains demand for digital services and reinforces the foundational role of telecom networks in India's inclusive growth story.**
11. **Airtel therefore submits that any regulatory intervention in retail tariff architecture must be evaluated against the Government's broader Digital India and DPI vision. Mandating Voice+SMS-only STVs with proportional pricing cuts would work at cross-purposes with these policy objectives by de-emphasizing data, weakening incentives for small but always-available data entitlements, and creating a new class of users who are nominally "connected" via voice calls but functionally cut off from the State's digital rails.**

II. MARKET-LED EVOLUTION OF BUNDLED TARIFFS: A SUCCESS OF TARIFF FORBEARANCE

1. Over the last two decades, retail tariffs in India have evolved from high, voice/SMS-only, per-minute pricing to simple "all-in-one" bundles. This transition has been driven by large-scale 4G rollouts, strong competition and a policy approach anchored in tariff forbearance rather than granular, ex-ante price-setting. India has now become a data-first market with affordable per-GB prices, with bundled prepaid packs (voice + SMS + data) forming the default mode of participation. Average monthly usage is now approximately 27–30 GB per wireless user.
2. This evolution reflects the benefits of allowing TSPs commercial flexibility in designing and optimizing bundles. In this context, any move **towards prescriptive tariff design - such as mandated unbundling or proportional pricing – requires careful assessment of its potential impact on market-led innovation, affordability and inclusion.**

EXISTING MARKET REALITY: ENTRY-LEVEL PLANS ALREADY FUNCTION AS VOICE-CENTRIC WITH ESSENTIAL DATA SAFEGUARDS

1. **The premise that entry-level Voice+SMS options are absent is misplaced.** The widely available INR 199 prepaid pack (28-day validity) already operates, in substance, as a voice- and SMS-centric plan. **The bundled ~2 GB for the entire validity—equivalent to roughly 70–75 MB per day—is**

purely incidental and not positioned as a value-bearing component of the plan. It is neither sufficient for meaningful data consumption nor priced as a data entitlement, serving only to maintain continuity of essential, low-bandwidth services such as UPI, DigiLocker, UMANG, and other critical digital applications.

2. **Accordingly, this minimal data layer does not alter the fundamental character or pricing logic of the plan as a voice-led offering.** It simply ensures baseline digital access without constituting a distinct source of consumer value. **Therefore, excluding such incidental data cannot be construed as creating any headroom for proportionate tariff reduction.** Any such interpretation—whether for this plan or others—**would compel operators to rework their entire tariff architecture.**
3. **This demonstrates that low-value “pure telecom” needs are already being effectively met through voice-dominant bundles with only a nominal data lifeline. Therefore, Airtel strongly submits that mandating a separate Voice+SMS-only tariff grid—particularly with an expectation of lower pricing—is unnecessary. More importantly, it risks inducing down-trading to zero-data products, potentially disconnecting users from essential digital services and undermining the broader objectives of digital and financial inclusion.**
4. It is also important to note that, in practice, entry-level bundled packs already perform the signaling function that the Draft 13th Amendment seeks to achieve: they provide a simple, predictable, low-ticket recharge option that assures unlimited voice and SMS along with a modest quantum of data. Imposing an additional Voice+SMS-only grid on top of these products will not expand meaningful choice; instead, it will fragment the portfolio, confuse consumers and, over time, encourage migration away from these carefully-calibrated, data-inclusive lifeline packs.

III. PROPORTIONAL PRICING IS TECHNICALLY UNSOUND AND ECONOMICALLY UNTENABLE IN INTEGRATED TELECOM NETWORKS

1. Telecom networks are inherently shared, integrated platforms, with voice and SMS increasingly carried over the same IP-based data infrastructure. In such an architecture, it is neither technically sound nor economically feasible to cleanly or objectively segregate costs between “data” and “non-data” components in the manner implied by proportional pricing rules. Any such exercise would rest on arbitrary allocations and would not reflect how networks are actually engineered, dimensioned or operated.
2. With the advent of 3G, 4G and now 5G, the industry has shifted decisively from voice/SMS-centric to data-centric network and revenue models. Voice is no longer the primary cost or revenue driver, and tariff design has necessarily evolved to reflect this reality. Retail tariffs are now deliberately structured as integrated bundles combining voice, SMS, data and, in many cases, additional digital or OTT services into a single offer, priced holistically on the basis of observed usage, competitive dynamics and overall customer value, rather than as a mechanical sum of stand-alone line items. **Once any component is removed or altered, the economics of the entire product—traffic mix, network load, usage profile and revenue realization—changes, and it cannot be treated as a simple subtraction of a notional “data charge” or “voice charge” from a composite tariff.**
3. Notwithstanding this shift, operators have consciously retained voice-centric packs with minimal data so as not to deter digital inclusion for elementary and low-usage customers. The value

transfer to consumers enabled by non-proportional pricing has been substantial. By way of illustration, a value pack priced at Rs. 199 in 2011 would, after applying a modest average annual inflation of 5.5 per cent, correspond to roughly Rs. 469 in 2026, yet today Rs. 199 typically buys unlimited local and STD calls, free national roaming and additional data (e.g. 2 GB). Such outcomes have been possible precisely because tariffs are not constrained by rigid internal proportionality, allowing operators to enhance value, build loyalty and deliver a genuine win-win for consumers and the sector.

4. In this context, **Airtel strongly submits that any requirement to apply a “largely proportional” reduction in tariff when a component (for example, data) is removed would force operators into artificial and subjective internal cost allocations within bundles. In practice, this would draw the Authority into continuous micro-pricing and de facto regulation of internal tariff components, which is fundamentally at odds with the long-standing forbearance-based regime. Such fine-grained price-setting is more efficiently and appropriately driven by market forces—competition, innovation and informed consumer choice—than by prescriptive formulas that do not reflect the integrated nature of modern telecom networks and services.**

IV. THE DRAFT 13TH AMENDMENT RISKS REVERSING TWO DECADES OF PROVEN FORBEARANCE-LED SUCCESS

1. Over the past two decades, TRAI has followed a consistent, well-calibrated policy of tariff forbearance. This approach has delivered some of the lowest telecom prices globally, rapid growth in access and usage, and a sustained pace of tariff and product innovation. It has also ensured regulatory predictability, enabling TSPs to make long-term technology and network investments while competing vigorously on price and value.
2. In this context, a mandate to create one-to-one “pure” variants (such as Voice+SMS-only) corresponding to every bundled offer, validity-wise, amounts to product design by regulation and is inconsistent with the forbearance approach. Such an obligation would risk freezing market experimentation, constraining tariff innovation and distorting the natural evolution of plans in response to consumer preferences and competition. It also sits uneasily with the long-standing policy premise that operators should retain flexibility in tariff structuring, so long as tariffs are non-discriminatory and compliant with the broader regulatory framework.
3. It is critical to recognize that India’s most impactful tariff innovations—including per-second billing, bundled or “free” national roaming, and unlimited voice packs—emerged organically from competition under a forbearance regime, not from prescriptive price controls or formula-driven structures. These innovations were made possible by non-proportional pricing, which allowed flexible, market-driven tariff design and delivered greater consumer surplus, wider choice and faster diffusion of new service constructs than any centrally engineered proportional pricing architecture could have achieved.
4. **In view of the above, Airtel strongly submits that the proposed 13th Amendment therefore marks a departure from the proven forbearance-plus-transparency model and risks eroding essential tariff flexibility at a particularly sensitive juncture. Operators are currently scaling 5G, investing in fixed–mobile convergence and preparing for future 6G evolution; these transitions demand rapid innovation in packaging, positioning and pricing. Curtailing that flexibility now**

would run counter to the sector's successful track record and could inadvertently dampen investment and innovation, to the detriment of consumers and the broader digital economy.

V. REGULATORS ACROSS SECTORS REJECT MECHANICAL "COST SUBTRACTION" IN BUNDLES - Bundling, Not Proportional Price Carving, Maximizes Consumer Welfare

1. **Regulatory practice across sectors shows that proportional, component-wise price-carving is neither necessary nor desirable for effective consumer protection. Regulators focus on overall outcomes, not on mandating internal price splits within complex bundles.**
2. In India, regulated and unregulated sectors offer basic variants alongside richer bundles. **Sectoral regulators such as IRDAI, DGCA, SEBI and RBI insist on disclosure and curb mis-selling, but none prescribes a mechanical rule that "if a component is removed, the price must fall proportionally."** This is a deliberate policy choice, grounded in the recognition that bundling—not linear, component-wise pricing—often maximizes consumer welfare, supports positive externalities (such as preventive healthcare or digital adoption) and enables efficient cross-subsidization. Forcing proportionality between Voice+SMS-only STVs and Voice+SMS+Data bundles would make telecom an exception to this settled cross-sector philosophy.
3. For example, in **health insurance**, insurers routinely offer basic hospitalization-only plans and enhanced variants with OPD, tele-consultation, diagnostics and wellness benefits. Premiums are not built as a simple sum of component costs; wellness features are consciously underpriced relative to standalone value to encourage preventive behavior, reduce long-term claims and improve portfolio risk. If regulators imposed proportional rules (for example, requiring hospital-only plans to be cheaper by the "full value" of wellness benefits), rich wellness bundles would become uneconomic, preventive incentives would weaken and long-run costs would rise. By analogy, generous data—especially unlimited 5G—plays a similar behavior-shaping role in telecom by accelerating digital adoption; proportionality would effectively penalize operators for over-providing data to drive usage and inclusion.
4. In **aviation and travel**, airlines may unbundle baggage, meals and seats, but pricing remains market-driven, without any mandated proportional relationship between base fare and add-ons. Tour operators and IRCTC offer flight-inclusive and land-only packages where price gaps reflect negotiated inputs, demand patterns and commercial strategy, not a mechanical "flight cost subtraction." A proportional rule forcing "land-only = flight+land minus full flight value" would compress margins, reduce packaging flexibility and choke promotional offers, leaving consumers with fewer and less attractive options.
5. In **hospitality**, hotels offer room-only, bed & breakfast and half- or full-board plans. The incremental price for B&B or board is frequently below the restaurant menu value because meals are cross-subsidized within the bundle to boost occupancy and ancillary spending. A proportional rule requiring room-only and meal-inclusive rates to move in lockstep with some internal "meal valuation" would either push prices up or strip out discounts, reducing attractive packages and consumer surplus. Consumers benefit when firms can "over-deliver" inside bundles; proportional pricing removes that over-delivery. The same logic applies when operators include relatively inexpensive incremental data in bundles to expand digital usage and inclusion.

6. Other regulated services show the same pattern. In **banking and financial services**, savings, current and salary accounts bundle ATM usage, digital banking, cards, rewards and insurance under a single fee, priced on portfolio economics, not on line-by-line cost subtraction. Removing “free ATMs” and demanding a proportionally lower fee changes the risk and utilization profile; the new product is economically different, not merely the old one minus a line item. In insurance, health and other policies bundle wellness, tele-consultations, discounts and assistance; removing one benefit does not and cannot generate a linear premium cut because it shifts selection, utilization and administrative costs. In digital and platform services, subscription bundles (cloud plus email plus productivity; video plus music plus gaming) are priced on take-up, breakage, churn and portfolio behavior; the **marginal cost of one feature is not equal to its economic value in the bundle, and its removal does not yield a precise proportional price reduction.**
7. In all these sectors, regulators explicitly accept that integrated bundles are legitimate and often pro-consumer. None demands the kind of mechanical “cost subtraction” that the Draft Amendment implicitly envisages for telecom bundles.
8. **The cross-sector evidence is therefore unequivocal: bundled offerings are priced as integrated commercial propositions, not as mechanical sums of separable costs. Telecom bundles operate on the same principle. Voice, SMS, data and associated digital benefits form a single tariffed offer designed around usage, capacity planning, retention and competitive strategy. Once a core element is removed, the product is no longer the same, and no proportional price reduction can be assumed. There is no objectively verifiable standalone “cost” of voice, SMS or data within such bundles that can simply be extracted; forced proportionality would push operators to redesign products from first principles and turn legitimate commercial judgment into regulatory micro-management.**
9. **Therefore, Airtel strongly submits that the proper regulatory role is to ensure transparency, prevent mis-selling and guard against anti-competitive conduct—not to dictate internal tariff architecture. Mandating proportional internal pricing between Voice+SMS-only STVs and Voice+SMS+Data bundles would break with established cross-sector practice, weaken cross-subsidization, raise effective prices for many consumers and restrict operators’ ability to offer attractive, innovation-led plans. It would replace a proven, outcomes-based, forbearance-driven framework with an input-based pricing intervention that is neither conceptually robust nor practically workable.**

VI. PROPORTIONAL PRICING MANDATE WILL DISTORT TELECOM ECONOMICS, DETER INVESTMENT, AND REVERSE DIGITAL INCLUSION

Telecom is a capital-intensive, low-ARPU, long-gestation business. Its viability depends on complete tariff flexibility to structure bundles, manage cross-subsidization, and recover investment across customer segments and over time. Any regulatory insistence on retail-level, component-wise proportionality would be economically unsound, commercially intrusive, and damaging to long-term consumer welfare.

1. Telecom Requires Tariff Freedom, Not Artificial Price Controls

- a. Operators need to continuously fund spectrum, dense radio networks, backhaul, core upgrades, IT systems, and substantial operating expenditure. Indian ARPUs remain modest despite very high data usage, leaving very limited room for regulatory compression of revenues. The sector cannot be governed through mechanical cost-plus logic or mandated price symmetry between distinct tariff constructs.
- b. A requirement that Voice+SMS-only STVs be proportionally cheaper than bundled plans would reduce revenue without reducing underlying network cost. It would encourage down-trading, weaken portfolio monetization, and directly erode the economic basis for investment in capacity, coverage, and service quality.

2. 5G Investment Must Not Be Penalized

- a. 5G deployment demands substantial incremental capex over 4G, while monetization will necessarily evolve over time. Operators have therefore extended 5G access across many 4G packs and used unlimited 5G promotions as legitimate market-development measures to accelerate adoption. These are investment-led strategies, not pricing distortions.
- b. If proportional pricing is imposed, such promotional offers may be treated as permanent benchmarks for "data value share," severely constraining future tariff design. That would chill innovation, weaken the business case for 5G and 6G, and discourage aggressive customer acquisition strategies that are essential in a competitive market.

3. Rural Markets Will Suffer Most

- a. The harm will be most acute in rural and semi-urban areas, where profitability is already limited and network expansion remains financially challenging. Lower-priced Voice+SMS-only STVs will draw customers away from data plans, reduce site-level revenues, and weaken incentives to upgrade or extend networks in low-income and sparsely populated regions.
- b. This would damage the internal cross-subsidy that supports wider coverage and deepen the digital divide. The result would be a population that is voice-connected, but excluded from essential digital services such as UPI, public welfare access, education, and telemedicine.

4. **Submission: Accordingly, Airtel strongly states that no proportionality-based pricing mandate should be introduced between Voice+SMS-only and data-bundled STVs. Tariff forbearance must be preserved, along with transparency and safeguards against unfair conduct. Only this approach will sustain investment, protect network quality, and advance inclusive digital growth.**

VII. POLICY CONTRADICTION: PROMOTING DATA INCLUSION IN ONE PAPER WHILE PUSHING DATA EXCLUSION IN ANOTHER PAPER

1. **TRAI's own PM-WANI consultation reflects a clear policy priority: expanding affordable data connectivity, improving digital access, and deepening internet adoption across the country. On**

the one hand, the Authority is actively promoting ubiquitous data-led inclusion; on the other, the present proposal seeks to force a tariff construct that excludes the data.

2. The regulatory objective cannot be to push India toward greater data usage while simultaneously distorting tariff architecture in a manner that makes non-data plans artificially attractive. If the policy thrust is to increase digital participation, then tariff regulation must support, not undermine, data adoption. A mandated proportionality between voice-only and data-bundled plans would do precisely the opposite: it would encourage consumers to shift away from data packs, weaken data-led consumption, and dilute the very digital inclusion outcomes TRAI claims to advance.
3. This is especially problematic because data connectivity is now the foundation for essential services, including UPI, e-governance, education, telemedicine, and access to public welfare. A regulatory framework that makes voice and SMS-only options relatively more appealing risks creating a class of consumers who remain technically connected but digitally excluded.
4. Accordingly, **TRAI must maintain policy coherence. It cannot, on the one hand, pursue every possible measure to expand data connectivity through PM-WANI and related initiatives, and on the other hand impose a tariff intervention that penalizes data adoption and incentivizes a backward-looking, voice-only usage model. Airtel submits that the proposed approach is self-contradictory, commercially distortive, and contrary to the larger national objective of digital inclusion.**

VIII. TRAI'S CONCERNS ARE MISPLACED AND NOT SUPPORTED BY MARKET REALITIES OR EVIDENCE

TRAI, in its consultation, has highlighted the following concerns and we do not agree with them. Our detailed submission against each concern is as below:

1. TRAI's concern on "deprivation" of affordable shorter-duration choices:

'The low-income group consumers are being deprived of affordable shorter duration choices.'

Airtel's Submission:

- a. The Draft 13th Amendment seeks to elevate proportional pricing from a commercial choice to a regulatory mandate, without first explaining why any particular pricing philosophy should be imposed through regulation.
- b. **The consultation does not present any clear empirical basis—no background data, market analysis or demonstrated consumer harm—to justify such a significant shift in the tariff framework. In the absence of concrete evidence on the scale and nature of the problem, the rationale for introducing proportional pricing into the TCPR remains unsubstantiated.**
- c. The premise that low-income consumers are "being deprived" of affordable shorter-duration choices is incorrect; in particular, the widely available ~₹199 prepaid pack with 28-day validity already functions, in economic substance, as an affordable, shorter-duration, voice-centric option that includes only about 2 GB of data for the entire month. This limited data

allocation—amounting to a very small daily average—is incidental and operates merely as a digital lifeline to keep essential low-bandwidth services (such as UPI, OTP-based authentication and basic applications) running; it is not positioned or priced as a material data benefit.

- d. The absence of a particular validity configuration in a specific Voice+SMS-only sub-segment cannot, by itself, be equated with deprivation or market failure warranting prescriptive regulatory design. It simply reflects a rational, market-driven choice to provide voice-led bundles with a modest data safeguard rather than to strip data out altogether.
 - e. **Imposing additional Voice+SMS-only packs on the unfounded premise of “deprivation” would amount to regulatory overreach, disrupting a functioning market and directly eroding the commercial viability and digital-inclusion role of existing entry-level products such as the ₹199/28-day pack, which already serve low-income consumers effectively.**
 - f. **Compounding these concerns, Airtel therefore respectfully questions the need for, and the justification behind, the proposed 13th Amendment and submits that regulatory focus should remain on clear disclosures and safeguards against unfair practices, leaving pricing strategies—including proportional or bundled models—to competitive market forces.**
2. **TRAI's concern on “asserted requirement of shorter validity packs for rural/feature-phone users”:**

‘The low-income group consumers, esp. those living in rural areas or using feature phones, require shorter validity packs so that they can recharge as per their requirements.’

Airtel's Submission:

- a. While some rural and feature-phone users may prefer shorter validity, preference alone does not justify mandating a full mirror set of Voice+SMS-only STVs across all validity periods. Operators must be able to align product design with demand at scale, distribution economics, and fraud- and misuse-related risks, which are typically higher for ultra-low-value, short-duration voice-only products.
 - b. **Therefore, Airtel strongly submits that imposing an obligation to replicate every bundled validity in Voice+SMS-only form would override legitimate commercial segmentation and could inadvertently reduce the overall availability of low-denomination options.**
 - c. **In addition, experience shows that ultra-short validity voice-only products are particularly susceptible to fraudulent usage i.e. spam and nuisance callers, which imposes negative externalities on the wider consumer base. Requiring operators to proliferate such products across all validities could therefore aggravate, rather than alleviate, consumer harm.**
3. **TRAI's concern on “only two options” (quarterly / yearly) and one-time payment burden**

'The existing packs are being offered in only two options of approximately quarterly and yearly validities. These higher validity packs require relatively substantial one-time payment, which may be challenging for such low-income group consumers.'

Airtel's Submission:

- a. Airtel respectfully submits that the concern is factually misplaced. Consumers already have access to an affordable entry-level pack of around ₹199 with 28-day validity. This pack is primarily voice and SMS-led, with only a nominal 2 GB data allocation meant for essential services such as UPI, OTPs and basic apps. It already serves the needs of price-sensitive users requiring low-cost connectivity.
 - b. Accordingly, the suggestion that consumers are left with only quarterly or yearly choices is incorrect. Low-income users today can and do choose shorter-duration packs such as Rs.199 pack where lower upfront payment is the key consideration.
 - c. Requiring operators to introduce Voice+SMS-only variants across every validity period would merely duplicate existing affordable options, fragment tariff portfolios, and erode the commercial balance of longer-validity packs. This could trigger tariff rebalancing elsewhere, to the detriment of consumers.
 - d. **The proposal therefore addresses no genuine market failure. Instead of expanding meaningful choice, it risks disrupting efficient tariff design and weakening the sustainability of existing low-entry packs that already cater to low-income consumers.**
4. **TRAI's concern on "multiple validity options for Voice+SMS+data STVs versus limited choices for Voice+SMS-only":**

'Whereas the STVs with Voice, SMS and data are offered with many validity options, Voice and SMS only packs are offered with limited choices.'

Airtel's Submission:

- a. Differences in the granularity of validity options between bundled and Voice+SMS-only STVs reflect distinct usage profiles, cost structures and strategic roles of these products in the overall portfolio. Bundled packs are the primary mass-market construct and therefore naturally exhibit greater variety; Voice+SMS-only STVs serve a more limited, niche segment and are accordingly fewer, but not absent.
- b. Regulatory insistence on mechanical symmetry in validity options ignores these economic and behavioral realities, thereby leaving little incremental consumer benefit.
- c. It is pertinent to note that once the Authority begins prescribing proportional relationships between Voice+SMS-only plans and bundled Voice+SMS+Data plans, tariff forbearance is eroded in substance, even if it is formally claimed to continue. In such a scenario, the regulator is effectively determining the internal tariff architecture and relative component values, rather

than restricting its role to transparency, non-discrimination and prevention of abusive practices.

- d. Therefore, **Airtel strongly submits that proportional pricing is typically more expensive on a per-unit basis than bundled or non-linear pricing because it removes portfolio effects, cross-subsidy and demand leverage that allow operators to lower effective unit costs and offer richer bundles. By flattening this leverage, proportionality tends to raise the individual price of service elements and makes participation costlier as usage grows—an outcome that sits uneasily with any stated objective of affordability or digital inclusion.**

5. **TRAI's concern on alleged disadvantage to non-data users and "lack of parity"**

'Consumers who do not use data have limited choices available and are placed at a disadvantageous position. This lack of parity goes against the objective of ensuring fair, equal and non-discriminatory choices for all consumers, regardless of their service requirements.'

Airtel's Submission:

- a. Non-data users are not similarly situated to data users in terms of usage intensity, network cost causation or long-term value, and treating them as such for parity purposes is conceptually flawed. Fairness and non-discrimination require that similarly placed consumers have access to reasonable choices on transparent, non-arbitrary terms; they do not require that every category of plan (Voice+SMS-only versus Voice+SMS+Data) be replicated across all possible validity and price points.
- b. **Therefore, Airtel strongly submits that forcing "parity" in this rigid sense would amount to regulatory micro-design of internal tariff architecture, constrain legitimate commercial differentiation, and could diminish the overall range and sustainability of offerings. In practice, this may leave both data and non-data users worse off, with fewer innovative plans and higher effective prices over time.**

6. **TRAI's concern on 'limited or no data needs by elderly consumers'**

'The Authority observes that the objective of the Telecom Consumers Protection Regulations is to ensure fair choice and protection for all categories of consumers, including low-income users, consumers in rural areas, non-tech savvy and even elderly persons who primarily require Voice and SMS services and have limited or no need for data services.'

Airtel's Submission:

Promoting Voice-Only Plans Will Entrench, Not Protect, Elderly and Pension-Dependent Consumers

1. TRAI's characterization of elderly and similar "non-tech savvy" users as having "limited or no need for data services" is factually outdated and normatively problematic from both a consumer-protection and digital-inclusion standpoint.

2. In practice, a very large and growing proportion of pension payments, social security benefits, welfare subsidies, banking services, health services and Government communications are now delivered, tracked or authenticated through digital channels, including UPI, Aadhaar-enabled systems, mobile banking apps, pension portals and tele-consultation platforms. For elderly and pension-dependent consumers in particular, basic data connectivity is no longer a discretionary add-on; it is increasingly integral to receiving pensions on time, monitoring account credits, submitting life certificates, accessing medical advice, and maintaining regular contact with family and caregivers.
3. It is worth noting that **for beneficiaries under the Viksit Bharat–Guarantee for Rozgar and Aajeevika Mission (Gramin) (VB–G RAM G), being confined to Voice-only packs with no data would directly undermine the scheme’s effectiveness and the State’s own digital-governance objectives. The architecture of VB–G RAM G, like contemporary wage-employment and rural livelihoods programmes, increasingly relies on digital processes for registration, demand capture, e-KYC, Aadhaar-based authentication, work allocation, MIS-based monitoring and direct benefit transfer of wages into bank accounts. In this context, basic data connectivity is not a discretionary add-on but a functional prerequisite for beneficiaries** to independently register for work, track muster rolls, verify wage payments, access grievance mechanisms and receive official communications.
4. Thus, for elderly workers and pension-linked rural households, the absence of data connectivity is even more damaging. Many such households simultaneously depend on digital tools for pensions (including digital life certificates and Aadhaar-enabled verification) and for wage and livelihood schemes; cutting them off from data leaves them formally enrolled but practically dependent on intermediaries for every digital transaction, increasing exclusion risk, information asymmetry and scope for abuse.
5. From a TSP perspective, any regulatory stance that implicitly pushes vulnerable VB–G RAM G users, particularly elderly and pension-dependent persons, into Voice-and-SMS-only plans would be inconsistent with the Government’s own design of these schemes and would, in effect, produce a class of “voice-connected but digitally excluded” beneficiaries who cannot fully access the rights, guarantees and transparency that VB–G RAM G is intended to secure.
6. To assume that this cohort “primarily requires Voice and SMS” and can be safely siloed into Voice+SMS-only plans is to normalize their exclusion from these essential digital interfaces. From an operator perspective, the objective of “fair choice and protection” for elderly and vulnerable users is best served not by promoting Voice+SMS-only products, but by ensuring the availability of simple, affordable bundled plans that include a modest quantum of data alongside voice and SMS.
7. Operators already offer such low-denomination and easy-to-understand packs, which allow elderly users to perform critical tasks such as viewing pension statements, receiving bank and subsidy alerts, using basic UPI and messaging applications and accessing tele-health, without imposing significant additional financial burden. A regulatory intervention that implicitly endorses the idea that elderly and low-income users have “no need” for data, and that structurally steers them toward Voice+SMS-only tariffs, would in effect create a class of

- consumers who are technically connected but digitally disenfranchised—cut off from the very pension, welfare and health ecosystems that policy is otherwise striving to digitize
8. Accordingly, while the underlying goal of protecting low-income, rural, elderly and non-tech savvy consumers is fully shared, the proposed framing and solution are misconceived. **Airtel strongly submits that true protection for these segments requires:**
 - a. **tariff forbearance that allows operators to continue offering simple, low-cost, data-inclusive bundles;**
 - b. **clear communication and safeguards against mis-selling; and**
 - c. **policy recognition that data connectivity is now a basic enabler of financial security and welfare access for the elderly, not an optional luxury.**
 9. Any regulatory push that privileges Voice+SMS-only packs as the default or “appropriate” choice for such users will undermine, rather than advance, their long-term interests and dignity.
