



May 11, 2026

Chennai

**Subject: Counter Comments to TSP Submissions on the Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026**

Citizen consumer and civic Action Group (CAG) thanks TRAI for the opportunity to submit counter comments to the submissions filed by Bharti Airtel Limited, Reliance Jio Infocomm Limited and Vodafone Idea Limited on the Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026.

CAG strongly supports the Draft Amendment as it improves:

1. Consumer choice
2. Affordability
3. Transparency
4. Accessibility for vulnerable consumers
5. Availability of Voice and SMS only plans across validity periods

The concerns raised by Telecom Service Providers primarily focus on commercial flexibility, while the draft regulation is intended to protect consumer interests. The draft regulation does not prohibit bundled data plans. It only ensures that consumers who do not require bundled data services are also given affordable alternatives. Consumer choice strengthens digital inclusion. It does not weaken it.

<b>TSP</b>	<b>TSP Argument</b>	<b>CAG Counter Comment</b>
Airtel, Vi, RJIL	Voice only plans may weaken Digital India and digital inclusion	Digital inclusion cannot be achieved through compulsory bundling. Consumers should have the freedom to choose services based on affordability and need. Affordable Voice and SMS plans help consumers remain connected instead of discontinuing usage due to rising recharge costs.
Airtel, Vi, RJIL	Consumers need data for UPI and essential services	Consumers who require data will continue to purchase bundled plans or add on data packs. The regulation does not remove data plans. It only restores consumer choice.
Airtel, Vi	Small data inclusion does not materially increase tariff cost	Even small increases matter for low income consumers, daily wage earners, elderly users and feature phone users. Affordability must be assessed from the consumer perspective and not only from operator cost calculations.
RJIL	There are no voice only consumers in India	India still has a large feature phone user base and many consumers primarily use voice and SMS services. Secondary SIM users, elderly users and rural consumers may not require regular data usage.
Airtel, Vi	Voice only plans may create digital exclusion	The absence of affordable recharge options itself can lead to exclusion through SIM dormancy, reduced recharge frequency and loss of connectivity. Consumer choice supports gradual digital adoption.

Airtel, RJIL	TRAI proposal amounts to tariff engineering	TRAI has a statutory obligation to protect consumer interests. The proposal does not impose tariff caps or prohibit bundled plans. It only ensures fair consumer choice and affordability.
Vi	Short validity packs reduce consumer value	Many low income consumers prefer lower upfront recharge values due to irregular income patterns. Flexibility is an important part of consumer welfare.
Vi, Airtel	Data packs are already affordable in India	India having low tariffs globally does not automatically mean all consumers can afford higher bundled recharges. Telecom affordability must be viewed from the perspective of vulnerable consumers.
RJIL	Mandatory Voice and SMS plans may increase spam and UCC	Spam and UCC should be addressed by TSPs' through stronger KYC, anti-spam systems, enterprise verification and stricter enforcement of regulations. Consumer affordability should not be restricted due to misuse by telemarketers.
RJIL	Consumers may accidentally buy Voice only plans and later require data	Consumers already make independent choices while purchasing data boosters, top up packs and validity plans. Providing more options improves flexibility and informed choice.

The present market increasingly pushes consumers toward bundled plans even when they may not require data services.

The Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026 is a reasonable and consumer centric proposal.

The regulation improves:

- Consumer choice
- Affordability
- Transparency
- Accessibility
- Fairness in telecom tariffs

The proposal does not remove data plans or restrict digital services. It only ensures that consumers who do not require bundled data services are not denied affordable alternatives.

CAG respectfully urges TRAI to proceed with the Draft Amendment in the interest of consumers, especially vulnerable and low income users.

Thank you.

About CAG – Citizen consumer and civic Action Group (CAG), is a Chennai-based, 40-year-old, non-profit organisation that works towards protecting citizens' rights in consumer and environmental issues, and promotes good governance processes, including transparency, accountability and participatory decision making.