



**COAI's counter comments TRAI draft notification on "Telecom consumers protection (Thirteenth Amendment) regulations, 2026".**

---

We thank the Authority for providing us the opportunity to share the counter comments to the Draft notification on "Telecom consumers protection (thirteenth amendment) regulations, 2026" COAI reiterates its primary submission that the proposed amendment is highly prescriptive, lacks evidence of market failure, and represents a departure from TRAI's long-standing and successful policy of tariff forbearance.

**A. Bundled Plans**

- 1) ***Some stakeholders have stated that the amendment appropriately addresses the issue of forced bundling of services. However, monitoring mechanisms should be established to ensure that service providers do not indirectly compel consumers to purchase bundled plans through pricing or promotional practices.***
- 2) ***Few stakeholders have stated that due to limited availability of Voice & SMS-only STVs and their concentration in higher validity periods, these consumers are often compelled to purchase bundled plans that include data services they do not use. This leads to avoidable expenditure and restricts their ability to choose tariffs aligned with their needs.***

**COAI counter comments:**

- a) We submit that there is no forced bundling of services for consumers and on the contrary the tariff plans are designed for maximum benefit of consumers and address consumer needs. Low-cost bundled plans under INR 200 with 28-day validity effectively function as voice and SMS packages, providing incidental data sufficient for essential services like UPI and government platforms. Furthermore, the mandated at least one voice-and-SMS-only STV under the TCPR 12th Amendment already caters to those seeking pure connectivity. Moreover, ITU 2025 data confirms that India has the world's lowest bundled telecom tariffs, making digital access highly affordable.
- b) The stakeholders who have mentioned forced bundling have overlooked the benefits and needs of various governments' programmes. The Government of India's Digital India, UPI, DigiLocker, e-Sanjeevani, and several other programmes are fundamentally built on data connectivity. Including minimal data in entry-level packs ensures critical connectivity, especially in emergencies such as medical crises, accidents, or safety threats. Data-enabled services like live location sharing, emergency messaging, or navigation support can be vital—and in some cases, life-saving. Depriving users of even minimal data could hinder their ability to seek help or share their position during distress.
- c) Further, we humbly submit that these stakeholders have also failed to appreciate the fact that offering voice-only features at lower validity separately will also attract Unregistered Telemarketers (UTM), engaged in bulk voice calling and fraudulent operations as it risks incentivizing the spammers. Such entities have little or no need for data and would find these packs at lower validity a means to conduct high-volume voice calls. This could lead to an escalation in spam calls, undermining the significant efforts made by TRAI and service providers under the Telecom Commercial Communications Customer Preference Regulations (TCCCPR), 2018.

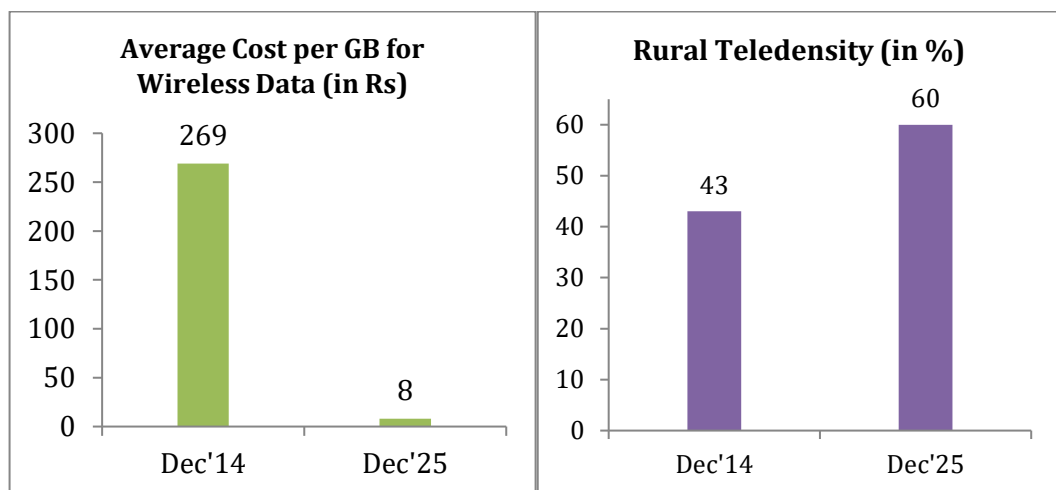
- d) Thus, a regulatory approach that defaults users to voice-only connectivity risks exposing them to avoidable harm by not only limiting access to various digital functionalities by nudging them toward non-data packs but also exposing them to recharges which are inappropriate for them while simultaneously giving impetus to unsolicited communications and frauds from unregistered telemarketers. Such a move would inadvertently push vulnerable groups away from the very tools that enhance safety and inclusion.
- e) Therefore, mandating multiple voice-and-SMS-only plans would be a grave travesty for India’s data-centric ecosystem and its Digital India goals. These mandates would confuse and deprive the exact segments they target—the elderly and rural users—who would be left more susceptible, disconnected from essential digital services, and unable to participate fully in the nation’s digital transformation.

**B. Affordable packs for elderly persons, rural consumers Low-income users**

- 1) ***Some stakeholders have stated that the regulation should explicitly recognise the needs of vulnerable consumers, including elderly persons, rural consumers, and low-income users. Service providers should ensure availability of short-duration validity options and affordable recharge amounts, having them in mind.***
- 2) ***Some stakeholders have also suggested that the consultation paper identifies a significant segment of telecom consumers—particularly elderly users, rural populations, low-income households, and feature-phone users—who rely primarily on Voice and SMS services. These consumers typically do not require data services and are highly sensitive to upfront recharge costs.***

**COAI counter comments:**

- a) There is no deprivation of low-income/ rural consumers or elderly users; rather, they are increasingly benefiting from a telecom ecosystem that prioritises affordability and inclusivity. Over the past decade, India has witnessed a dramatic expansion in connectivity, with total telecom connections exceeding 1.2 billion and tele-density rising significantly driven in large part by growth in rural areas. Importantly, this expansion has been supported by a sharp reduction in data prices, enabling even low-income users to access digital services without financial strain.



(Source: TRAI PMR Reports)



- b) Contrary to the assertion that affordable options are lacking, telecom services in India have reached deep into rural and remote regions, supported by both market-driven investments and policy initiatives. Rural India is now a key driver of sectoral growth, accounting for a substantial share of new subscribers and increased data usage. Affordable tariffs, coupled with widespread 4G availability and ongoing 5G expansion, have ensured that even non-urban consumers can access reliable voice and data services, thereby narrowing the digital divide.
- c) Moreover, tariff offerings are structured to deliver greater utility over time, ensuring that low-income and elderly consumers derive consistent value from their expenditure. The combination of low-cost data, bundled services, and expanding network coverage has enabled telecom services to penetrate small towns and villages at an unprecedented scale.

### **C. On Proportional Pricing Being Appropriate**

- 1) ***One of the stakeholder has stated the provision requiring proportional tariff reduction is appropriate and most welcome; however, the term 'largely proportional' requires clearer definition. The Authority may consider issuing pricing guidelines or benchmarks to ensure consistency and prevent arbitrary pricing practices.***
- 2) ***While a few stakeholders have stated that the provision requiring proportional tariff reduction is appropriate and most welcome***

#### **COAI counter comments:**

- a) In this regard, it is important to note that for telecom service providers, the primary cost driver for entry-level plans is not data itself but the expense of keeping a subscriber actively connected to the network. This includes spectrum usage, network infrastructure, signalling, and fixed operational overheads. Given that entry-level plans are already very affordable, including or excluding data does not meaningfully alter the underlying tariff. Consequently, removing data would not enable a proportionate reduction in price for consumers.
- b) Furthermore, proportional pricing is commercially unviable and technically flawed. Telecom networks operate as integrated, shared infrastructures—spectrum, tower operations, backhaul, and maintenance costs do not decrease proportionally when data is removed from a plan.
- c) The Hon'ble Minister for Communications has also recently highlighted the availability of affordable voice and data tariffs, which are among the lowest globally, while underscoring India's success in building Digital Public Infrastructure<sup>1</sup>.
- d) Therefore, mandating voice-and-SMS-only STVs with proportional pricing cuts would work at cross-purposes with these policy objectives. Such mandates would de-emphasise data, weaken incentives for small but always-available data entitlements, and create a new class of users who are nominally "connected" via voice calls but functionally cut off from the Governments Digital India programme.

---

<sup>1</sup> <https://www.pib.gov.in/PressReleaseDetailm.aspx?PRID=2229144&reg=3&lang=2>



## **Conclusion**

Therefore, COAI reiterates its request to the Authority to refrain from intervening in tariff design or mandating specific voucher structures through the Draft Thirteenth Amendment. The stakeholders endorsing the amendment have not engaged with the substantive economic and technical arguments against it.

COAI respectfully urges the Authority to continue with its well-established and proven policy of tariff forbearance, allowing market-driven solutions to continue serving consumer interests effectively as they demonstrably have, delivering the most affordable bundled telecom services.

-----XXX-----