

VOICE Counter-Comments on TRAI consultation on “Draft Telecom fea1-Consumers Protection (Thirteenth Amendment) Regulations, 2026” div < fea1-div@traf.gov.in >

H Upadhay < hupadhyay@consumer-voice.org >

Sun, 10 May 2026 1:07:37 PM +0530

To "fea1-div"<fea1-div@traf.gov.in>

Cc "COO"<coo@consumer-voice.org>,"Avijit Bose"<avijit.bose@consumer-voice.org>,"Nilanjana Bose"<nilanjana.bose@consumer-voice.org>

To,
Shri Vijay Kumar, Advisor (F&EA),
Telecom Regulatory Authority of India,
4th, 5th, 6th & 7th Floor, Tower-F,
World Trade Centre, Nauroji Nagar,
New Delhi: 110029
e-mail:- fea1-div@traf.gov.in

Dear Sir,

Subject: VOICE Counter-Comments on TRAI consultation on “Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 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 concessions and reliefs warranted by a sinking TSP are being exploited by completely healthy TSPs.

ISPAI

Industry Request:

1. Mandates relating to compulsory Voice and SMS-only pack variants, and “Largely proportional” pricing requirements be withdrawn since these measures offer limited incremental consumer benefit, while imposing significant operational complexity and risks to sector viability and investment cycles.

VOICE Counter comments:

*There is absolutely no case made out for charging for services not required by the consumer. It is clear exploitation of the **near-monopoly** by private sector TSPs. The statement “since these measures offer limited incremental consumer benefit” is almost a falsehood observed the popularity of required VOICE ONLY plans being offered by BSNL.*

*As to the “**operational complexity and risks**” with the level of automation and now AI, this argument is rather expeditious and is not worth consideration.*

2. Tariff forbearance and pricing flexibility be restored as the cornerstone of telecom regulation, avoiding prescriptive intervention in product design or component pricing.

VOICE Counter comments:

*In the guise of “**Tariff forbearance and pricing flexibility**” exploitation of consumers cannot be tolerated. There is a purpose to this clause being part of the rule-book and its regulator’s responsibility to be proactive on consumer exploitation.*

Cellular Operators Association of India (COAI):

d) Therefore, it is respectfully submitted that regulatory efforts should, instead of mandating voice-only tariff vouchers, focus on facilitating infrastructure creation in the country. Considering the foregoing, we request the Authority to kindly refrain from intervening in tariff design or mandating specific voucher structures, and to continue with its well-established policy of forbearance, allowing market-driven solutions to continue serving consumer interests effectively.

VOICE Counter comments

1. TRAI must ensure that 28 days periodicity is totally eliminated – it is absolute cheating of consumers. Periodicity of plans should be mandated strictly as 15 days, 1 month, 3 months, 6 months and 1 year.

2. There is no relationship between the topic under discussion and infrastructure creation. We all are well aware of the continuing network blackspots, blackouts, network overload, missing coverage and weak network. In fact, predominant consumers complaints now-a-days are network related as observed from appeals filed.

Yours’ Sincerely

10th May 2026

--
--

Hemant Upadhyay
Advisor-Projects, IT & Telecom

Consumer VOICE
M-20, Lajpat Nagar-II
New Delhi-110024
Ph. 011-29831121
www.consumer-voice.org

DISCLAIMER:

"This message (including any attachments) may contain confidential, proprietary, privileged and/or private information. The information is intended to be for the use of the individual or entity designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited."
