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To,

Mr.Ashok Kumar Jha,

Secretary (I &C),

Telecom Regulatory Authority of India,

New Delhi

Sub. – Counter Comments on Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026.

Dear Sir,

Greetings from SAMARPIT, Bilaspur, Chhattisgarh...!!!

Counter Comments / Suggestions

1. General Support to the Proposed Amendment

The proposed amendment is a welcome step toward strengthening consumer choice, affordability, and inclusiveness in the telecom sector. The initiative particularly benefits senior citizens, rural populations, economically weaker sections, and feature-phone users who primarily depend on Voice and SMS services and do not require mobile data.

The Authority has rightly observed that consumers should not be compelled to purchase bundled data services when their actual requirement is limited to Voice and SMS.

The proposed amendment therefore aligns with the principles of consumer protection, digital inclusion, tariff transparency, and fair market practices.

2. Need for Affordable and Short-Duration Voice & SMS Packs

The observations made by the Authority regarding the lack of shorter-duration Voice and SMS-only STVs are valid and supported by ground realities, particularly in rural and tribal regions.

Many consumers from low-income households are unable to afford higher-value quarterly or annual recharge packs in one payment. In rural India, especially among daily wage earners and elderly citizens, telecom usage often depends on small and frequent recharge patterns.

Therefore, the proposal requiring corresponding Voice and SMS-only packs for each validity period offered under bundled packs is strongly supported.

However, it is suggested that TRAI should specifically ensure availability of:

7-day validity packs

14-day validity packs
28-day validity packs
56-day validity packs
84-day validity packs

This will ensure practical affordability and flexibility for all categories of consumers.

3. Pricing Mechanism Requires Clearer Regulatory Benchmark

While the draft amendment proposes “largely proportional reduction in tariff” for Voice and SMS-only STVs compared to bundled Voice, SMS and Data packs, the phrase “largely proportional” may lead to subjective interpretation by Telecom Service Providers (TSPs).

To avoid ambiguity and possible misuse, TRAI may consider:

Defining a transparent pricing methodology;

Mandating that the tariff reduction should reasonably reflect exclusion of data benefits;

Requiring TSPs to disclose comparative tariff calculations for bundled versus non-data packs.

Without a measurable benchmark, consumers may continue to face disproportionately priced Voice and SMS-only packs.

4. Need for Monitoring and Compliance Mechanism

The amendment should include a clear compliance and monitoring framework to ensure effective implementation by TSPs.

It is suggested that:

All Telecom Service Providers should submit quarterly compliance reports to TRAI;

TRAI should publish comparative details of available Voice and SMS-only STVs on its website;

Non-compliance or non-availability of mandatory STVs should attract suitable penalties.

This will improve accountability and help consumers make informed choices.

5. Importance of Consumer Awareness

The success of the proposed amendment depends largely on consumer awareness.

Many rural and elderly consumers are unaware of the existence of Voice and SMS-only recharge options. Therefore, TRAI should direct TSPs to:

Publicize such packs prominently in retail outlets;

Display them clearly on mobile applications and websites;

Inform consumers through SMS campaigns and customer care systems;

Ensure availability through offline recharge channels.

The Authority’s proposal regarding publication and display of such packs is highly appreciated and should be implemented strictly.

6. Protection of Rural and Feature Phone Users

The amendment is especially significant for consumers residing in rural, remote, and tribal areas where:

Smartphone penetration remains limited;

Internet connectivity is weak;

Consumers continue to rely on feature phones;

Telecom services are used mainly for voice communication.

In such regions, forcing consumers to purchase unwanted data services increases financial burden without corresponding utility.

Hence, TRAI's intervention is necessary to uphold equitable telecom access and prevent indirect discrimination against non-data users.

7. Suggestion for Separate Consumer Category

TRAI may also consider creating a separate regulatory category for:

Senior citizens,
Feature phone users,
Low-income consumers,
Rural subscribers using basic telecom services.

Special simplified tariff products for these users may be introduced under consumer protection regulations.

8. Need for Periodic Review

The proposal to review implementation after six months is appreciated.

However, during the review process, TRAI should also assess:

Actual affordability of the packs;
Consumer adoption levels;
Rural accessibility;
Complaints regarding availability and pricing;
Compliance by all service providers.

Stakeholder consultations with consumer organizations and CAG members should also be conducted during the review period.

Conclusion

The proposed Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026 represent a positive and consumer-centric reform aimed at ensuring fairness, affordability, and freedom of choice in telecom services.

The proposal is particularly important for economically weaker consumers, rural populations, senior citizens, and feature phone users who do not require bundled data services.

The undersigned supports the intent and objective of the amendment. However, stronger safeguards regarding tariff proportionality, compliance monitoring, affordability benchmarks, and consumer awareness are necessary for effective implementation.

Accordingly, it is requested that the Authority may consider the above suggestions while finalizing the amendment regulations.

Thanking you,

Yours sincerely,

(Dr. Sandeep Sharma)

MEMBER – CAG &

President

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