

Comments on the Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026

1. Keeping Consumer-Centric Choice at the Core

The proposed amendment is much needed and urgent requirement of millions of common consumers across India for a Voice-SMS only tariff plans across all validity periods. Currently the bundled plans are forcing all the consumers who need only Voice-SMS plans and don't need data at all which costs them a lot which is a sheer form of consumer exploitation and violation of their multiple consumer rights including the right to choice and be fit for the purpose. The current plans of Voice-SMS (plus some data, their price remains unfair, unreasonable, unwanted, unrealistic and binding in nature.

2. Current Voice-SMS (binding data) plans are unsuitable for the Common Consumers

Millions of consumers viz; rural, women, children, elderly people, low-income consumers, consumers with limited digital capability, featured phone users and the dual sim owners. Therefore, it's strongly recommended that the monthly validity or short duration validity choices shall be made available to them. It shall be made responsibility of the all the retail outlets and customer care centres to educate and made fully aware to the common consumers about the available choices of most appropriate Voice-SMS only plans.

3. Why push back on the consumer-friendly proposal of Voice-SMS only plans

All the Telecom service providers shall offer the Voice-SMS only plans rather than pushing back this consumer-friendly proposal. It's came to our notice that Telecom operators are pushing back against Trai's proposal for more low-cost basic recharge plans without data, warning it could hurt digital adoption, weaken returns on 5G investments and increase spam. The dispute opens a wider debate on telecom pricing and consumer choice but in the interest of millions of common consumers ultimately their interest shall be predominated.

4. Future network investments shall not be at the cost of common consumers

What started as a consumer-choice issue is turning into a larger debate over telecom tariffs, digital adoption and even future network investments. In the interest of their own consumers, Telecom operators shall not push back against the regulator's draft regulations that require them to offer more voice-and-SMS-only recharge plans with prices reduced in line with the exclusion of data benefits.

5. Strong evidences of strong consumer demand of Voice-SMS only plans

It's noted that some telecom companies are arguing that there is no evidence of strong consumer demand for such plans, and that the move could push users away from digital services in the absence of data in plans. There is also an argument given by some Telcom companies that "If sufficient demand existed for voice-only special tariff vouchers across all validity periods, service providers would already be offering them in a competitive market.

But there are enough evidences and data available that millions of common consumers actually need Voice-SMS only short duration plans but they are not available in the market. There are millions of telecom users who need Voice-SMS only plans for short durations at a much fair tariff but they are optionless right now.

6. Voice-SMS only plans are not against the tariff forbearance-based regime

Some Telcom companies also say that the proposed TRAI amendment go against the tariff forbearance-based regime, could increase spam by unregistered telemarketers, and may impact their 5G return on investments and future 6G investments.

But again, there are enough user end evidences which can easily prove all these concerns false and market oriented, anti-consumer choices.

7. Voice-SMS only plans in all validity periods is not at all over intrusive

Some Telcom companies may also say that the earlier requirement by TRAI for a 365-day voice-only plan was a "reasonable and balanced compromise". It, however, said extending this to every validity period could be excessive and overly intrusive.

But again, the Voice- SMS only plans for every validity period is not at all excessive and overly intrusive rather that a much-needed consumer demand across India.

8. There are no sufficient choices in Voice-SMS only plans at competitive prices

The observation of TRAI, Consumer organisations and millions of consumers are very much right that current TSPs have fallen short of their earlier mandate on voice-and-SMS-only plans, limiting choice and blunting price benefits for users. Telecom companies currently offer a couple of long-duration options such as 80/84 days or annual packs for such services. On the other hand, the validity period options for data-bundled packs have a long range that starts from as low as 14 days. It shows a clear mis match between data plans and Voice-SMS only plans.

9. Why shall buying data be a compulsion for the common telecom consumers?

Consumer organisations have been observing since long that low-income consumers or those using feature phones require shorter validity packs so that they can recharge as per their needs. It's also noted that the consumers who do not require data are often compelled to buy bundled packs with data, leading to avoidable expenditure and limited choice. So many consumer organisations including our own has been sending representations in this

regard to TRAI on multiple occasions to provide a choice of Voice-SMS only plans in all the validity periods.

10. Buying add on data packs may not be a justification of not providing Voice-SMS only plans in all validities

Some Telecom companies may say that “40-45% of subscribers on voice-only plans are still purchasing data add-ons, indicating that even in this segment is not purely voice centric.” But again, its misleading in the context of millions of telecom users who need only Voice-SMS only plans in all the validity periods for their suitability.

It is also said that “The market has effectively evolved into a data first ecosystem, with voice as a complementary service. Again its misleading in the favour of millions of Voice-SMS only plans in all the validity periods.

Therefore, the assumption of a possible, sizable, distinct ‘voice-only’ customer base is much needed and based on mass consumer requirement across India.

11. Longer duration plans are economic, is a myth

Countering on the argument of long-duration plans, many operators are arguing that longer-validity packs are actually more economical for low-income consumers. Even though the upfront payment might be higher, the effective per-day cost of a quarterly or yearly pack is typically lower than doing multiple shorter-duration recharges. If that is the case than why the TSPs are reluctant to offer the choice of short duration Voice-SMS only plans in all validity periods. It means that the argument is not transparent at all and not in favour of the millions of common consumers across India.

12. Digital exclusion of Voice-SMS only plan holders is unscientific logic

While TSPs have warned over digital exclusion on extensive promotion of voice-only plans, they also fear downtrading by users to such packs with zero data in exchange for modest savings. This argument is also entirely non substantial and rather misleading in nature. Because the Voice-SMS only plan holders may not need data connectivity and their data needs may be fulfilled by some other paid sources.

13. Creating a data exclusion society by providing Voice-SMS plans is a gimmick

Some telecom companies are also arguing that “Such a step of offering Voice-SMS only plans in all the validity periods 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,” This argument of these TSPs are baseless and totally misleading in the sense that the segment of consumers who don’t need data plans, are such that they are in any case dependent for data usage on the other sources like their family members, etc. For example, an old mother who ever require any data on a featured phone, but her digital

requirement like producing life certificate, Adhar authentication and others are easily fulfilled by other family members who have good data packs with them

14. Technological compulsion may not turn in to cost impositions

On proportional reduction in tariffs, the TSPs are saying that 4G and 5G networks operate on shared, integrated IP-based infrastructure, core costs such as spectrum, tower operations, and backhaul do not proportionally decrease simply because data is removed from a plan. But what does it mean? Whether the common consumers shall price for this challenge or what? Common consumers shall be charged only for only what they need and accordingly what is being offered to them strictly as per their needs and not with the TSPs undesirable conditions.

15. TSPs shall not bother about the essential digital services of common consumers

Some TSPs have the opinion that common 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 2GB data allocation meant for essential services such as UPI (unified payment interface), OTPs and basic apps. But again, why this 2 GB data which is not needed at all and why the cost is so high for them?

16. Voice-SMS only plans across all validity periods will promote digital inclusion

It is being said by Telecom companies that the current market-driven tariff design has ensured both affordability and digital proliferation at scale. “The current tariff structures are not exclusionary but are, in fact, designed to maximize consumer benefit, and any prescriptive intervention in this regard may be counterproductive,”. But it’s also a hard fact that what ever may be the claims of the telecom companies, the need of a Voice-SMS only plan in all the validity periods is big miss in the current tariff regime and which shall be provided by the telecom companies at the earliest.

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