



1939, 9th MAIN, 27th CROSS, BANASHANKARI 2nd
Stage, BENGALURU - 560070
Phone: 6364928222
E-Mail : ccsbng@gmail.com
Website: ccsbng.org

16th April 2026

To,

**Advisor (Financial & Economic Analysis),
TRAI
New Delhi**

Sir,

**Subject:- DRAFT NOTIFICATION TELECOM CONSUMERS PROTECTION (THIRTEENTH
AMENDMENT) REGULATIONS, 2026**

We are TRAI authorised CAG for Karnataka State.

We have attached our comments on the above Draft Notification for your consideration.

Thanking you,

Yours sincerely

Gopal Ratnam V
Secretary

Comments on
DRAFT NOTIFICATION TELECOM CONSUMERS PROTECTION (THIRTEENTH AMENDMENT)
REGULATIONS, 2026

This regulation is a welcome step by TRAI to ensure that some segments of the market as mentioned in the explanatory memorandum who may opt for Voice and SMS only plan are afforded choices, which is an important right of the consumers.

The regulation brings many modifications like that of Increasing customer choice with plans in all validities, Restoring fairness in the marketplace by ensuring that the prices are reduced proportionately to reduction in data to the Elderly, Poor, and Segments that don't need data, it is necessary and should be implemented.

Consumer Care Society (CCS) endorses the draft notification and its immediate implementation.

Consumer Care Society (CCS) however urges that the regulator TRAI further regulate the plans to ensure that consumers are not disadvantaged due to the structure of the market which is almost a duopoly. In this regard, Consumer Care Society offers these following suggestions for consideration of TRAI.

1. **Lifeline or Basic Plan**. The plan is targetted at low-income households/user so that they have access to the essential service of Telecommunication and Internet. This plan can be a subsidized plan or at cost plan. The Plan would be of a short term validity which could be 28 days or maximum 84 days only. The number of such plans may be one or maximum two. The plan would be standardised and would be offered by all the Telecom Service Providers. As an example for an Average Urban Consumer, a possible plan would be

Monthly Baseline Need (Typical User) 28 days

- Voice: 250–300 minutes
- SMS: 50–100 SMS
- Data: 4–6 GB

This reflects:

- Moderate calling
- Low SMS usage (due to WhatsApp shift)
- Essential data (payments, browsing, video)

The Price of this plan as mentioned earlier would be kept low so that almost all households/user in the urban areas could afford it. Such a plan would go a long way in achieving the vision of a digital Bharat.

A similar plan can be worked out for the rural area based on the typical usage pattern there.

A similiar initiative has been implemented in the Health Insurance sector in India.

2. **Modular Plans.** The bundled offers by the TSPs has contributed to a heavy cost to the average Indian Consumer. Further with made so-called Value added Services (VAS) the consumer welfare has diminished. With consumer having varied usage patterns it is ideal to move into a modular regime.

Instead of being offered bundled offers which do not suit the consumer needs and in the process buying plans that results in losses to them, modular plans offer wider choice and more value to the consumer. With almost all plans boosting of unlimited voice, it neither makes practical or financial sense to buy the plans with unlimited voice. TSPs should provide packs for varying validity in VOICE, SMS and DATA and allow the consumer to combine the packs to suit their needs.

3. **Other Issues.** TRAI could also consider other ways of increasing consumer choices and providing more value to consumers like Micro Recharges and Rollover conditions.

Gopal Ratnam V
Secretary
Consumer Care Society