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To

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The Advisor, (Financial and Economical Analysis),

Telecom Regulatory Authority of India (TRAI),

New Delhi.

Sub: Counter-comments on the Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026

Reference: TRAI Draft Notification No. RG-8/(2)/2025-ADV_FEA-I dated 7th April 2026.

1. Digital Inclusion Should Be a Choice, Not Forced

TSPs say data packs are needed for Digital India and to encourage digital usage.

Our view: Digital inclusion should be based on consumer choice and affordability, not compulsion. Many low-income, elderly, and feature-phone users primarily require only Voice and SMS services. Forcing them to pay for data they do not use creates an unnecessary financial burden. Consumers should have the freedom to choose affordable Voice/SMS-only plans according to their needs.

2. Spam and Security Should Be Managed by TSPs

TSPs say cheaper packs may increase spam.

Our view: Preventing spam and fraudulent activities is the responsibility of telecom operators through effective technology, monitoring systems, and existing regulatory frameworks. Genuine consumers should not be denied affordable recharge options because of operational challenges faced by telecom companies.

3. Price Should Reduce if Data is Removed

TSPs say costs are fixed, so prices cannot change much.

Our view: Data is one of the primary components of modern telecom packs and a major factor in pricing. If the data component is removed, consumers should receive a reasonable and proportional reduction in price. Charging nearly the

same amount for Voice-only services is unfair to consumers who do not use data services.

4. Equal Validity Options for Everyone

TSPs say current long-validity plans are enough.

Our view: This approach disadvantages low-income consumers who depend on smaller and more frequent recharges. While data users are offered multiple recharge options such as 28, 56, and 84 days, similar flexibility is often unavailable for Voice-only consumers. Equal validity options should be provided for Voice/SMS-only plans to ensure fairness and affordability.

5. Data Should Not Be Forced in the Name of Safety

TSPs say data helps in emergencies.

Our view: Many consumers using basic or feature phones do not access such digital features. For smartphone users, telecom operators may provide optional “Data Lock” facilities to avoid unwanted usage instead of forcing paid data packs. Consumer safety should not be used as a justification for increasing costs for those who only require basic connectivity.

6. Information Should Reach All Consumers

TSPs say information is available on websites and apps.

Our view: A large section of consumers, especially rural and elderly users, may not regularly access websites or apps. Therefore, Voice/SMS-only plans should also be clearly displayed at retail shops and communicated through SMS alerts in regional languages so that all consumers are properly informed.

With warm regards



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Chairman – CREATE.

