Industry Recommendations on Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026

fea1-div < fea1-div@trai.gov.in >

Sarika Gulyani < sarika.gulyani@ficci.com >

Tue, 12 May 2026 3:48:19 PM +0530

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

Cc "Chetan Bijesure"<chetan.bijesure@ficci.com>,"TEAM ICT"<Team.ICT@ficci.com>

Shri Vijay Kumar
Advisor (Financial & Economic Analysis)
Telecom Regulatory Authority of India (TRAI)
Government of India
New Delhi

Subject: Industry Recommendations on Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026

Dear Sir,

This is with reference to the Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026, issued by TRAI for stakeholder consultation. On behalf of industry stakeholders, we would like to submit the following recommendations for your consideration.

India?s telecom sector has evolved into a foundational layer for the country?s digital economy. It supports key public digital infrastructure such as JAM trinity, UPI, telemedicine, online education, and e-governance platforms. Over the past decade, India has transitioned into a data-first market, with average monthly data consumption reaching approximately 27?30 GB per user. This transformation has been enabled by tariff forbearance, competitive market dynamics, and the widespread adoption of bundled prepaid offerings combining voice, SMS, and data.

The Draft Amendment proposes mandating Voice + SMS-only Special Tariff Vouchers (STVs) across all bundled plan validities, along with a requirement for ?largely proportional? pricing vis-à-vis bundled offerings. These provisions may result in outcomes akin to retail price regulation and component-wise tariff structuring, which may be seen as a shift from TRAI?s established forbearance-oriented approach.

From a market perspective, it is pertinent to highlight that low-value prepaid packs, typically priced below INR 200 for a 28-day validity, already function as de facto Voice + SMS packs with minimal data allocation. The limited data provision in such plans primarily supports essential services such as UPI, DigiLocker, and other government applications, rather than enabling full-scale internet usage. This indicates that the market already caters to price-sensitive consumers without regulatory intervention mandating separate product constructs.

Mandate for offering Voice+SMS only plans for all validities with proportional reduction could inadvertently lower the operational costs for unregistered telemarketers, who can use the low-cost, low validity plans to use and throw SIMs after making UCC to avoid being identified and face consequent action.

Further, the telecom sector remains capital-intensive and is currently in a phase of financial recovery after prolonged tariff compression. With substantial investments already made in 5G deployment, pricing flexibility is critical for operators to ensure sustainable returns, expand rural coverage, and invest in future technologies such as 6G. Introducing constraints on tariff design and requiring proportional pricing between bundled and unbundled offerings may compress revenues, increase regulatory risk perception, and adversely impact investment flows into the sector.

It is also important to recognise the technical and economic limitations of component-based pricing in telecom. Modern networks are integrated IP-based systems where voice and SMS services are increasingly delivered over data infrastructure. Consequently, allocating discrete costs to individual service components is neither precise nor operationally practical. Tariffs are therefore designed holistically based on usage patterns, competitive positioning, and network economics. Introducing a ?proportional pricing? requirement could lead to artificial or difficult-to-standardise cost allocations and necessitate ongoing regulatory intervention in tariff-setting.

TRAI?s forbearance-led regulatory approach has historically delivered significant consumer benefits, including some of the lowest data tariffs globally and continuous innovation in tariff structures. International and cross-sector regulatory practices also emphasise overall pricing transparency and consumer protection rather than mandating internal price ratios within bundled offerings. The proposed framework, therefore, may not be fully aligned with prevailing regulatory approaches adopted globally and across sectors.

Along the same lines, we respectfully submit the following recommendations:

1. The proposed mandate for Voice + SMS-only packs across all plan validities may be reconsidered, given the limited incremental consumer benefit and potential disruption to existing tariff structures.
2. The requirement for ?largely proportional? pricing between bundled and unbundled offerings may be withdrawn, considering the complexity of telecom cost structures and the risks of implicit price control.
3. TRAI may continue to uphold the principle of tariff forbearance, complemented by strong transparency and disclosure norms, rather than prescribing product design or internal pricing relationships.

In conclusion, maintaining regulatory flexibility will be critical to sustaining sectoral investments, enabling technological advancement, and supporting India?s broader digital and economic ambitions.

Our members would be pleased to engage further with TRAI on this matter and provide any additional inputs as required.

Warm regards,

FICCI 100
100 YEARS OF BUILDING TOMORROW

Sarika Gulyani
Senior Director & Head ? Technology, Communications, Mobile Manufacturing, and Language Technologies
Federation of Indian Chambers of Commerce and Industry
Industry's Voice for Policy Change
Federation House, 1, Tansen Marg, New Delhi 110001, INDIA
T: +91-11-2373 6190 **F:** +91-11-2332 0714
M: +91- 9891242931 **Web:** www.ficci.in

Web: www.ficci.in
ISO 9001:2015 Certified

Click here to access: *FICCI's Knowledge Paper Series*
FICCI Corporate Identity Number (CIN): U99999DL1956NPL002635

Please print this email only if necessary - Let's save our environment