



GSMA APAC
Suite 1207-10 12/F
Great Eagle Centre
23 Harbour Road
Wan Chai
Hong Kong
Tel: +852 3960 5000
gsma.com

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**To Shri Vijay Kumar
Advisor (F&EA),
Telecom Regulatory Authority of India (TRAI),
Government of India,
4th, 5th, 6th and 7th Floor, Tower-F, World Trade Centre, Nauroji Nagar, New Delhi
110029**

Subject – GSMA Submission to TRAI on the Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026

The GSMA appreciates the opportunity to provide comments on the Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026 issued by the Telecom Regulatory Authority of India (TRAI). We recognise and support the Authority's continued efforts to strengthen consumer protection and to ensure that telecommunications services remain accessible, affordable, and responsive to the needs of diverse user segments.

Expanding the availability of voice and SMS-only Special Tariff Vouchers (STVs) addresses a specific demand highlighted in the consultation, particularly for demographics like rural populations, the elderly, and low-income earners who remain digitally inactive. While providing these targeted options theoretically supports affordability and prevents users from paying for unnecessary data, the practical success of such an initiative depends entirely on how these offerings are structured. The goal of fostering "greater choice" is valid in principle; however, ensuring these vouchers actually align with broader inclusion goals rather than simply segmenting the market requires a more critical look at the underlying service requirements of these consumers. Simply making these plans available does not automatically guarantee a superior user experience or meaningful cost savings.

At the same time, it may be useful to consider whether achieving this objective necessarily requires the replication of Voice and SMS-only STVs across every validity period of bundled offerings. In dynamic and competitive telecom markets, operators rely on flexibility in tariff design to respond to evolving consumer preferences, usage



patterns, and operational considerations. In this context, an approach that ensures the availability of Voice and SMS-only plans across a representative and accessible range of validity periods may serve the intended purpose of enhancing consumer choice, while preserving the flexibility that supports continued innovation in tariff structures.

With respect to pricing, the consultation reflects an intention to ensure that Voice and SMS-only plans are offered at tariffs that are proportionately lower than comparable bundled plans. While the emphasis on affordability and fairness is important, it is also relevant to recognise that telecom pricing structures are influenced by a range of factors, including significant fixed and shared costs related to network infrastructure, spectrum, and operations, as well as broader considerations such as usage patterns, consumer segmentation, and the role of entry-level plans in supporting access to essential digital services. As a result, the relationship between bundled services and stand-alone offerings may not always be strictly linear. In this context, a principles-based approach that emphasises transparency, fairness, and reasonableness in pricing may provide a more flexible and sustainable pathway to achieving consumer protection objectives, while remaining reflective of underlying economic realities.

It is also important to recognise the role of entry-level bundled plans that include a modest amount of data. Such plans can serve as a practical safety net, enabling essential or emergency digital transactions when needed, while also supporting digital inclusion by encouraging initial and low-intensity internet use. Viewed in this light, these offerings should not be characterised as depriving consumers of choice, but rather as providing additional value and optionality at the entry level.

The Authority has also highlighted the need to expand the availability of shorter-duration and lower-value recharge options. It may be helpful to consider how these offerings are positioned within the broader tariff ecosystem, so that they complement rather than inadvertently fragment existing pricing structures. In addition to plan design, considerations around ease of discovery, clarity of communication, and availability across customer touchpoints may be equally important in ensuring that such plans effectively reach the intended user segments and support their participation in essential digital services.

In considering the design and implementation of these proposals, it may also be important to take into account potential unintended consequences. Where lower-value or short-duration Voice and SMS-only offerings are introduced in a highly standardised or widely replicable manner, there may be a risk that such plans could be subject to misuse by bad actors operating at scale. Over time, this could have implications for consumer trust in communication channels, particularly in the context of increasing concerns around fraud and unsolicited communications. It is also important to ensure that interventions in tariff structures do not inadvertently weaken the role of entry-level connectivity offerings in supporting safe and meaningful access to digital services.



Ensuring that measures aimed at enhancing accessibility and affordability are implemented in a manner that also supports trust, digital participation, and the integrity of communications ecosystems will therefore be important. In this regard, a balanced and proportionate approach that takes into account both consumer needs and broader ecosystem considerations may be beneficial.

It may also be helpful to situate these proposals within the broader context of the Indian telecommunications sector, which continues to operate in a highly competitive and capital-intensive environment. Ongoing investments in network expansion, 5G deployment, and next-generation digital infrastructure remain critical to sustaining service quality and extending connectivity. Regulatory approaches that carefully balance consumer protection objectives with the need to preserve commercial flexibility may help support both immediate consumer interests and longer-term sector development. Stable and predictable tariff frameworks have historically played an important role in supporting investment cycles, and any changes to tariff structures may benefit from being considered alongside these dynamics.

From an implementation perspective, TRAI may adopt a phased or iterative approach that may allow for smoother adaptation by service providers, while also providing an opportunity to assess how consumer behaviour and market dynamics evolve over time. The inclusion of a review mechanism, as indicated in the consultation, could further support evidence-based refinement, ensuring that the intended outcomes are achieved effectively and sustainably.

In conclusion, the GSMA supports TRAI's objective of enhancing consumer choice and ensuring that telecommunications services remain inclusive and accessible. An approach that maintains flexibility in tariff design and adopts a principles-based approach to pricing, may help advance these objectives in a manner that is both practical and sustainable. At the same time, careful consideration of potential unintended consequences, the importance of trust in communication channels, and the need to support inclusive digital participation will be important in ensuring that regulatory outcomes remain effective over the long term.

The GSMA and its members remain committed to continued engagement with TRAI in support of these shared goals.

Yours sincerely,

A handwritten signature in black ink that reads "Jeanette Whyte". The signature is written in a cursive, flowing style.

Jeanette Whyte
Head of Policy and External Affairs, APAC
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