



हिमाचल उपभोक्ता संरक्षण परिषद् (रजि) शिमला

CAG Member: Telecom Regulatory Authority of India

Member: Consumer Coordination Council, New Delhi.

मुख्यालय: कंवर निवास, कनलोग, शिमला-171001

जोगिन्द्र कंवर

अध्यक्ष

रणजीत सिंह धीमान

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Comments of Himachal Uppbhogkta Sanrakshan Parishad, Shimla on comments of Telecom Service Providers on Telecom Consumer Protection (13th Amendment) Regulations 2026 are as under:-

The above draft regulations issued by the TRAI addresses a critical gap in the market, the lack of standalone Voice and SMS packs. While the TSPs have raised concerns about tariff forbearance, a strong consumer centric rebuttal is necessary to ensure fair play.

1. The TSPs argued that the mandate to offer largely proportional price reductions for Voice/SMS only packs amounts to retail price control and interferes with the market driven tariff forbearance model.

Whereas our point of view is that forbearance is a privilege, not an absolute right. When TSPs systematically bundle unwanted data with voice to inflate the minimum average revenue per user they create a market failure when vulnerable segments like elderly, low income, rural consumers are forced to pay for service they cannot use. Similarly price reduction is not price fixing; it is a safeguard against predatory bundling. Without this mandate, TSPs could price a voice only pack so close to a bundled pack that the choice becomes illusory.

2. TSPs argued that modern 4G 5G networks are data-centric and separating voice from data is technically and commercially counter intuitive.

Our view is that while the network may be IP-based, the consumers utility is not. Lot of consumers still use feature phones or basic devices solely for communication. Forcing data onto non users exacerbates the digital divide by taxing those who are digitally less active.

3. TSPs argued that they already offer some basic plans and that adding more unique validity counterparts will clutter the tariff menu and confuse consumers.

We have another view that while current basic plans are often hidden in deep sub-menus or restricted to specific recharge channels. The amendment required to match every unique validity period of bundles packs ensures that a consumer looking for the plan has a data free alternative at every step.

At the end we are of the view that the TRAI should reject the TSPs plea for continued forbearance in this specific niche. The regulation should go further by mandating that these Voice/SMS only pack be prominently displayed on the homepage of TSP apps and websites, ensuring they are not buried to discourse adoption.

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CAG Member of TRAI

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9.5/2026