



RJIL/TRAI/2026-27/045

5th May 2026

To,

Shri Vijay Kumar,
Advisor (F&EA)
Telecom Regulatory Authority of India,
Tower-F, World Trade Centre,
Nauroji Nagar, New Delhi – 110029.

Subject: RJIL’s comments on TRAI’s “Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026”.

Dear Sir,

Please find enclosed the comments of Reliance Jio Infocomm Limited (RJIL) on the TRAI’s “Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026” dated 07.04.2026.

Thanking you,

Yours Sincerely,

For **Reliance Jio Infocomm Limited**
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SINGH
GULIANI

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KAPOOR SINGH
GULIANI
Date: 2026.05.05
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Kapoor Singh Guliani
Authorized Signatory

Enclosure: As above

Preface:

1. Reliance Jio Infocomm Limited (RJIL) thanks the Authority for giving us an opportunity to offer comments on the important draft notification of **Telecom Consumers Protection Regulations, 2012**.
2. At the very outset, we submit that we do not agree with the proposal under draft 13th amendment to Telecom Consumers Protection Regulations, 2012 (TCPR-2012), as the proposed mandate under this Draft amendment is anti-consumer, promotes unregistered unsolicited commercial communication (UCC), is in violation of TRAI's own policy of Forbearance and goes against the economic principles as explained in following paras.

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3. **The draft 13th Amendment to TCPR 2012 proposes to mandate multiple STVs with only voice and SMS benefits, corresponding to each validity period of STVs currently being offered for Voice, SMS, and data services.** This Draft amendment seeks to expand the scope of TRAI's intervention introduced vide the 12th amendment dated 23rd December 2024, which mandated the provision of at least one STV with exclusively Voice and SMS benefits with the validity period not exceeding 365 days.
4. While the intent of enhancing consumer choice seems pro-consumer, it is respectfully submitted that such a mandate may lead to unintended consumer inconvenience. Going by the prevailing validity periods of STVs on offer, this amendment is proposing to expand number of exclusive voice and SMS STVs from current 1-2 to 8-12 for a TSP. We regret to highlight that this mandate seems to have been proposed without analyzing the success of the previous mandate and without any publicly available empirical data to support this proposal.
5. We submit that instead of benefitting the consumers, this proposed measure will further complicate the life for telecom consumer who will buy a voice/SMS only pack lured by its lower cost for his/her preferred validity and then will find out to their shock that he cannot even make:
 - UPI payments
 - Online recharge
 - Access and leverage the benefits of self-care app.

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- Communication via OTT apps
- Access to social media and other entertainment,

As all of the above needs data connectivity. This could lead to inconvenience, additional expenditure, and dependency on external assistance, particularly affecting elderly, and rural users.

6. On this unpleasant realization, the customer will have to take help for online data pack recharge or run to nearest retail store for the same, as the life is intricately interlinked with data and data is imperative to use these modern technology features for everyone. For another set of customers this cycle will be preceded by query to customer care, complaints to the Authority and followed by an inevitable purchase of a data pack to offset the mistake of buying this cheaper looking TRAI mandatory recharge. We submit that this is just a reproduction of event cycle that has become apparent from the thousands of queries received at various touchpoints for the currently available NO DATA packs. Pertinently many of these are elderly customers that are seeking some data for at least UPI payments with these exclusively voice/SMS recharges and many more are rural users.
7. We submit that prior to 12th amendment mandate of offering at least one STV with only voice and SMS benefits, the customers were able to avail all unlimited services for a fixed duration with a single recharge. The bundled flat tariffs provided all telecom services viz. data, voice, and SMS at one go. Many such tariff offers included subscription to OTT services as well, providing the consumers the convenience of one-stop solution for all digital requirements.
8. We submit that the tariff plans offered by RJIL are completely aligned to meet the requirements of entire spectrum of the customer preferences and usage patterns. RJIL has a very active customer service and feedback mechanism. We are interacting with customers while serving them at call centres, through Interactive BOTs, our website and self-care application, through physical stores located across the country and through home visits by our agents to deliver SIMs or to address service queries and issues.
9. This enables us to decipher consumer choices and design products to match the consumer requirements. This understanding has shaped the entire bouquet of tariffs on offer. The tariffs being offered meet the requirement of all users e.g.
 - a. An unlimited 4G data plan for regular heavy data users.
 - b. An unlimited data pack with 1 day data validity for occasional heavy data users.

- c. Tariff offers providing daily data entitlements of 1 GB/1.5 GB/2 GB/2.5 GB/3 GB with validity ranging from 18-22 days to 84-98 days.
- d. PV, CV and STV with monthly i.e., 30 days validity and those that can be renewed on same date every month.
- e. Annual tariffs with heavy data as well as low data allowance.
- f. A voice centric low cost 28 days validity tariff offer that provides unlimited voice calls with only 2 GB of monthly data allocation.
- g. Special data boosters for all kind of intermittent data requirements.
- h. Very low entry level as well as regular tariff for customers with low paying capacity and using smart feature phones.
- i. Exclusive Voice and SMS benefits STVs with the validity period of 84 days and 336 days. (As mandated by the Authority vide 12th Amendment)

These varied tariff choices ensure that all RJIL customers have sufficient choices and can find the best fit tariff to meet their requirements. Further, RJIL ensures that customers can easily move from one tariff to another whether prepaid or postpaid, to enhance consumer choices. **RJIL's tariff offerings are continuously refined based on extensive consumer feedback collected through multiple channels including customer care, digital platforms, and retail touchpoints. Thus, we can easily assert that our tariff bouquet is able to meet the requirements of all our customers and more particularly the elderly customers.**

- 10. Further, we do not agree with the assumption that elderly or rural based customers do not require data with their plans. We submit smartphone usage and data usage can be seen in every age group and region in the country. The smartphone users exceed¹ 1000 million already with projections of exceeding 1500 million by 2040. Over 76% of Indian wireless users are broadband users, as evident from TRAI's own data.
- 11. Further, **it is widely accepted fact that India is way ahead of its global peers in digital adoption in areas like UPI payment, quick commerce, digital governance etc. and therefore Indian users' behaviour cannot be put in any fixed bracket basis assumptions or even representation by some consumer organizations with limited members.**
- 12. We reiterate our submissions made earlier also that a vast number of consumers in age above 65 years like to use mobile data services as this enables them in hassle-free daily shopping with help of UPI, staying connected over social media groups, ordering daily needs including medicines on e-commerce / quick commerce platforms and for using video on demand. Thus, evidently, there is no need to

¹ <https://www.statista.com/statistics/467163/forecast-of-smartphone-users-in-india/>

mandate tariffs to address unfounded issues for this classify this age group any differently in India.

13. Similarly, the consumers in the rural areas are seeking more and more data which can help them connect with the world. We constantly get queries from rural areas on timelines for 5G availability in their areas, wherever 5G is currently not available and this surely does not pertain to voice/SMS only packs.
14. The current data clearly challenges the premise that there is meaningful standalone demand for voice only plans, as detailed below:
 - a. **40–45% of subscribers on voice-only plans are still purchasing data add-ons, indicating that even this segment is not purely voice-centric. The remaining 55-60% are also using some data.**
 - b. **Any voice only customer using any amount of data is an informed data customer who is buying data in spite of buying voice only plan. The number of customers buying voice only plan and then sticking to same are very small.**
 - c. **Among users on the ₹189 entry-level bundled low data plan with only 2 GB data, 88% users actively consume data at significant levels.**
15. The above data points lead to a fundamental question: **If even the lowest-paying users and so-called “voice-only” subscribers are consistently using data and the consumer buying voice only plan are also buying add-on data, where is the real demand for pure voice-only services?**
16. Evidently, the evidence suggests:
 - a. **Data usage is now near-universal, even among price-sensitive segments.**
 - b. **There are no Voice-only customers.**
 - c. **The market has effectively evolved into a data-first ecosystem, with voice as a complementary service.**
17. Therefore, the assumption of a possible, sizable, distinct “voice-only” customer base is misplaced. Regulatory interventions based on this assumption risk misaligning with actual consumer behaviour and market realities and would only help the voice/SMS spammers who need short term plans so as to reduce the cost due to the disconnection of their numbers getting flagged in AI based SPAM flagging.

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18. Thus, we submit that it will not be in consumer interest to confuse them with a lower cost recharge that will deprive them of data benefits. India has the world's lowest data tariffs and service providers offer tariffs with varied data quotas starting with 2 GB per month upto 3 GB per day and even unlimited 4G and 5G data. The availability of these tariffs, without any doubt, has led to India's digital growth and TRAI is requested to not disturb the same.

Proposed Mandate should recognize Consumer Preference and Network Design:

19. It is submitted that Reliance Jio Infocomm Limited (RJIL) operates a fully IP-based, end-to-end data network with no circuit-switched fallback, supporting only 4G LTE and higher technologies. Consequently, RJIL does not have feature phone users on its network; all subscribers use devices compatible with wireless broadband services.

20. RJIL is currently the largest telecom service provider in India, and its subscriber base has consciously chosen a data-centric network, reflecting a clear preference for data services. At the same time, in compliance with the mandate under the 12th Amendment to the TCPR, RJIL already provides options for users who may wish to avail only voice and SMS services.

21. In this context, the proposed mandate is likely to create unnecessary inconvenience for the majority of subscribers, whose primary preference is data usage rather than limited voice- and SMS-only offerings. A uniform regulatory requirement, applied without regard to network architecture or consumer choice, risks undermining the very principle of consumer flexibility.

22. Further, the Authority has not provided any details regarding the nature or distribution of complaints received—specifically, whether such concerns arise predominantly from users on legacy 2G feature phones who are unable to utilize data services despite being charged for it. If such issues are confined to a particular segment of users or networks, they merit a targeted and proportionate regulatory response.

23. Accordingly, the Authority should address the concerns of 2G feature phone users through a differentiated approach, rather than imposing a broad mandate that results in avoidable inconvenience to subscribers who have deliberately opted for an end-to-end data network.

Draft Amendment promotes unregistered unsolicited commercial communication (UCC)

24. The Authority is aware that one of the critical unaddressed UCC related issue is the prevalence of unregistered telemarketers (UTMs) that use voice calls to spam and fraud the public. One major measure that has been successful in curbing these spammers to some extent is the AI/ML based spam flagging by TSPs. The only work around AI based spam flagging available to the spammers is throwing away and replacing the SIM once the number has been flagged as possible spam. The positive outcome of this measure is that the cost for spammers has increased and may dissuade them from indiscriminate calling.
25. However, the **TRAI proposal under the Draft 13th amendment to TCPR 2012 will have the impact of reducing the cost for these spammers. As these spammers are the only entities in the ecosystem that use mobile phones for only voice services, the TRAI mandate to offer voice/sms only plans at lower validities will enable these spammers.**
26. We submit that as per our internal data analysis, the voice/SMS only plans and lower MRP plans are the preferred option of spammers. The following data points, collated basis AI-ML suspected plan flagging are pertinent for the Authority's consideration.
- a. **The percentage of spammers vis-à-vis subscribers on a STV is much higher on voice/SMS only STVs with MRP ₹448 and ₹1748 in comparison to other packs. For instance, it is 2.5 times that on popular daily data plan 299.**
 - b. **The percentage of spammers vis-à-vis subscribers on a STV is highest on the lowest entry level STV of ₹189, viz. 3.6 times that on popular daily data plan 299.**

These data points clearly point to the trend that the introduction of lower price points with low data or zero data, will be a boon for spammers and their adoption of these plans is likely to increase.

27. **It is also quite possible that these spammers are the ones that are pushing the narrative that there is a need for lower cost and lower validity for the voice/SMS only recharges.** The Authority should be aware of these negative fallbacks before even contemplating such proposals.
28. It is pertinent to mention that the genuine user of voice/SMS only STVs, if there are any, would prefer higher validity only, as these provide tariff predictability and lower costs on per day basis and removes the need of regular recharges.

Policy of Forbearance in telecom tariffs and vitiating the spectrum auctions

29. Since the notification of Telecommunication Tariff Order, 1999 on 09.03.1999 (“TTO”), the Authority has gradually evolved the policy of forbearance in telecom tariffs. Under this the Authority gives the service providers freedom to design and implement the tariffs suited to the prevailing market conditions. The expansion in scope of forbearance over the years is credited with the lowest tariffs and generational changes that has soared the teledensity and increased wireless broadband penetration in the country. The policy of forbearance can also be credited with making India, the market with second highest smartphone penetration. Thus, it is important that any changes in the tariff regulations do not alter the basic tenets of forbearance and regular tariff interventions in the form of mandated tariffs are avoided.
30. Furthermore, it needs to be borne in mind that post the debunking of ‘first come first serve’ policy by Hon’ble Supreme Court in the landmark 2G judgement in 2012, all spectrum in the country is assigned through auction. The TSPs have been acquiring the right to use spectrum at very high costs, with an implicit understanding of prevailing policy of tariff forbearance. However, the Authority has, of late, intervened multiple times in tariffs, which has effectively vitiated the auction terms and conditions, causing the investors to rethink their investment viability. We submit such interventions should be avoided and the market forces should be allowed to function smoothly, as this is the only way the sector can prosper as more investments in newer data technologies will flow.

Violation of economic principles.

31. The second part of the TRAI draft amendment seeks largely proportional reduction in charges for the voice and SMS STVs in comparison to Voice, SMS, and Data STVs. TRAI expectation is of reduction in prices commensurate with the data benefits being excluded. However, it is worthwhile to understand that modern communication networks are not designed for separate service offerings. The cost of obtaining spectrum, building, and maintaining the networks, sales and distribution of services are accrued to the complete service bouquet and cannot be separated for voice and data.
32. Further, the Authority is aware that the 4G and 5G networks are designed primarily for high-speed data, ultra-low latency data connectivity and not only for voice. Voice has become an additional component of the data usage on 4G/5G networks, which are used for primarily for video streaming, App usage, IoT, and high-speed internet. The spectrum is acquired and networks are built for delivering the data services along with voice/SMS services and the costs for data services cannot be alienated from a service

offering in by using any linear reduction formula. Thus, any such expectation is against the basis economic principles.

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33. The data services are the basic unit for modern telecom tariffs. The tariffs are designed around the quantum of high-speed data to be provided and the mode of provisioning the same i.e., whether with daily capping or monthly capping or no restrictions. Unlimited Voice services in both home and national roaming are provided in all RJIL voice and data plans alongwith a large number of domestic SMS. Other major operators in the market also follow similar tariff structures.

34. However, the primacy of the data services is neither without context, nor is it limited only to telecom sector. It is a global phenomenon where all sectors of economy are now data driven and Government is aggressively promoting broadband proliferation as Digital literacy and availability of broadband services is deemed to be the key for economic societal welfare and growth.

35. In this context, it is difficult to imagine tariff without data services, as even if you do not use data services for any other purpose, you would need it to access India's magnificent technology enabled innovation of instant real-time payment system i.e. Unified Payments Interface (UPI) to make payments. Of course, there will be users that require less data and want to pay primarily for voice services, and the same is addressed with tariffs having less data allocation.

36. We further submit that when all efforts are on to connect the unconnected, the attempts to continuously mandate offers for subscriber categories that do not use data or are unlikely to use data seems counter-productive.

37. Therefore, we submit there is no need to mandate voice/SMS only plans and the policy of forbearance should be persisted with. It is further submitted that even for this segment; by providing plans without data, we will lose the chance of connecting these users with digital economy. With limited data allocation, these customers will have the chance to experience data services and realize their importance, thereby enabling them to join the data led economy. However, if such segment is kept under only voice plans, we will lose this important opportunity of digital upliftment of these subscribers.

38. Therefore, we are constrained to reiterate our submission that TRAI was wrong in mandating such plans earlier and it is wrong to expand the scope of these plans now. The data services are the most integral part of a telecom consumer's life. The

consumers depend on data services to make payments, access Government services, access news content, meet religious requirements and various other daily needs.

39. Data services are required for even the least data savvy customers to at least use the UPI, which is the most preferred payment instrument in the country right now and also experience the transformative changes being ushered by Artificial Intelligence (AI) and generative AI apps. **Further, the Government under its Digital India mission and Viksit Bharat vision is heavily relying on data services to deliver the Government services, scheme benefits to the consumers. The consumers are also using data services for their critical daily need services like mobile recharge, train and bus ticket booking, electricity, water and gas bill payment, downloading boarding pass and using applications like Digi-Yatra. Thus, a world without data services is unimaginable, at least in India. Consequently, mandating multiples of voice/SMS only plan will be a huge travesty to data centric world and would confuse and deprive the exact segment it is targeted at i.e. the elderly and rural users, as they will be more susceptible.**
40. The service providers already offer voice centric low data plans with reasonably low costs that ensure that the customer can use the connection primarily for voice while simultaneously remaining connected to data services as well. Evidently, the market needs are well addressed and does not warrant any intervention by the Authority.
41. It is also worthwhile to mention here that Unlimited voice services is an important generational change in telecom tariffs in India. RJIL introduced these beneficial innovations to post extensive study of international examples of flat tariffs and simplified charges for voice services. Unlimited voice in both home and roaming has unburdened the consumers from continuous ongoing recharges and gone are the days when the customers would need expensive roaming packs or search for PCOs to make important calls while travelling. The impact of these innovations is seen in the increased MOUs and the fact that such tariffs have now become the norm across industry. Therefore, no curbs should be put on such innovations by TSPs under current Forbearance regime by mandating the tariffs. It is submitted that any move to impact the unlimited voice benefits will be a retrograde step against the national vision and policy documents like NDCP-2018.
42. In view of this and in the interest of the fair market rules and level playing field we do not recommend any unnecessary regulation over voice or SMS services. We further submit that any unnecessary regulation over services currently under forbearance should also weigh in the fact that there is an equally strong unregulated OTT market

waiting to pounce upon such opportunities, for instance the current movement of taking transactional/service messages as well as UCC through OTT route.

43. Further, with regards to the Authority's view that the operators did not implement the 12th amendment effectively and offered only a few price points and deprived the customers of a lower validity, we submit that in our case, the implementation was in compliance with the amendment and there were two reasons for opting for the mentioned implementation.

44. The first was the fear of misuse of lower validity by UTM's and associated escalation in spam, which prompted us to not offer low-cost voice only packs that could have unleashed the use and throw of SIMs. The second reason was to enable the customers with better discounts at higher validity as the per day charges decrease as we move towards higher validity. This served the dual purpose of avoiding unnecessary confusion caused by lower price points at lower validity. We had highlighted similar concerns previously as well during the discussion on 12th amendment to TCPR. Further, as mentioned above, we have been receiving many complaints on wrong purchase of recharge despite making all efforts to remove the confusion by offering limited price points with full transparency, thus clearly the implementation was correct and well thought out.

45. In view of the above, it is once again reiterated that there is no need to provide for separate plans for Voice & SMS to meet the specific requirements of subscribers and current plans are sufficient to meet requirements.

46. Conclusions

- 1. The current tariff plans are aligned with consumer choices and there is no scope for intervention.**
- 2. There is no need to mandate more voice/SMS only plans for each validity period and the current plans are sufficient to meet the requirements.**