



# राष्ट्रीय समुददेशीय विकास संस्थान

## Rastriya Samuddeshiya Vikas Sansthan

(ISO 9001: 2018 CERTIFIED ORGANISATION)

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Ref. 95/TRAJ/2026-27

Date 09/05/26

To  
Shri. Vijay Kumar Advisor  
(Financial & Economic Analysis)  
Telecom Regulatory Authority of India,  
World Trade Centre Nauroji Nagar  
New Delhi -110029

**Subject: RSVS's Counter Comments on Consultation Paper on the Telecom Consumer Protection (Thirteenth Amendment) Regulations.**

**Reference: TRAI's Consultation Paper dated 7th April 2026**

Dear Sir,

We are TRAI authorised CAG Member State of Uttar Pradesh & Uttarakhand.

This is in reference to TRAI's Consultation Paper on the Telecom Consumer Protection (Thirteenth Amendment) Regulations dated 07 April 2026.

In this regard the RSVS appreciates the opportunity to provide Counter 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.

The RSVS is presenting the following counter commands to the various TSP and other Association commands given in the above regulation.

Regarding "No Evidence of Market Failure"

The submission that there is no evidence of market failure is not fully justified. It is respectfully submitted that the role of TRAI is not only to act after complete market failure occurs, but also to proactively safeguard consumer interests and prevent situations that may adversely affect consumers.

As a consumer organisation/NGO, we have interacted with a large number of telecom consumers, particularly senior citizens, rural users, economically weaker sections, and feature phone users, who have consistently expressed that they do not require mobile data services but are still compelled to purchase bundled plans containing data in order to continue basic voice calling and SMS services.

*Y. Mani*

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Such a situation limits meaningful consumer choice and imposes unnecessary financial burden on consumers who only require basic telecom services. Therefore, the proposed regulation is a timely and necessary consumer protection measure and should be implemented strictly in the interest of affordability, inclusiveness, and consumer welfare.

Regarding "Data is No Longer Optional; it is Foundational to Daily Life"

There is no dispute that mobile data and internet connectivity have become important components of modern digital life. However, the practical realities of India's socio-economic conditions also need equal consideration.

A significant population in India still belongs to low-income and low-literacy segments and continues to use feature phones primarily for voice communication and SMS services. For such consumers, mandatory inclusion of data in every recharge plan does not necessarily create meaningful digital participation. Rather, it forces them to pay for services which they neither understand nor use.

The objective of digital inclusion cannot be achieved merely by forcing unwanted data packs upon consumers. True consumer-centric regulation requires availability of affordable and need-based choices. Therefore, Voice + SMS-only plans with adequate validity must remain available for consumers who do not require internet services.

Regarding "Risk of Increased Unsolicited Commercial Communications (UCC)"

The concern regarding increase in unsolicited commercial communications (UCC) appears misplaced in the context of Voice + SMS-only plans. UCC today is largely generated through robocalls, OTT platforms, internet-based applications, automated dialing systems, and bulk communication technologies, many of which are data-driven.

Therefore, linking the issue of UCC with availability of Voice + SMS-only plans does not appear to have sufficient merit. Consumers seeking basic telecom connectivity should not be deprived of affordable plans merely on the basis of speculative concerns unrelated to the actual source of UCC.

Instead of restricting consumer choice, efforts should continue towards stronger enforcement mechanisms, improved spam detection technologies, and strict action against entities responsible for UCC violations.

In view of the above, it is respectfully submitted that TRAI's proposal to ensure availability of Voice + SMS-only plans with proportionate pricing and validity comparable to existing bundled plans is fully justified, consumer-centric, and necessary in the larger public interest.

Overall, while the draft amendment is a progressive step, incorporating the above suggestions with clearer linkage to existing TRAI regulations and enforcement mechanisms will significantly enhance consumer protection and regulatory effectiveness.

Thanking You.

Yours sincerely

  
(Poonam Sharma)  
President

